Environmental Management System Manual

Site name:	New Hall Farm Paper Drying Facility
Site address:	New Hall Farm, Sunnyslack, Broughton Moor, Maryport, CA15 7RL
Operator name:	Robert Skelton Contractors Limited
Permit reference:	EPR/EP3922SL
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Contents

1 Introduction

This document comprising an Environmental Management System (EMS) Manual has been prepared by Shann Pitts Consulting Limited on behalf of Robert Skelton Contractors Limited, herein termed 'the Operator,' for a waste treatment activity, namely drying of paper sludges to produce animal bedding, at New Hall Farm Paper Drying Plant, New Hall Farm, Sunnyslack, Broughton Moor, Maryport, CA15 7RL, herein termed 'the Site'.

The waste treatment activity constitutes the drying of wet paper sludge waste (absolute non-hazardous) from paper mills on 4 No. drying floors utilising waste heat from 4 No. biomass boilers (which are operated under a Part B permit from Allerdale Borough Council, ref: PPC/ABC/B/26) on site. Since 1 April 2023 Allerdale is now part of Cumberland Council Unitary Authority. The dried paper may be blended with sawdust (produced on site from the firewood business) to produce a material suitable for animal bedding or alternatively sold as a pure dried paper product.

In addition to the main waste treatment activity, there is associated waste storage prior to and after the waste treatment (drying).

The entire EMS comprises of a series of 'live' documents to assist and inform daily site operations. This document, the EMS Manual, is an overarching document providing a foundation structure to the EMS which then links to specific EMS documents including the Fire Prevention Plan (FPP), Dust Management Plan (OMP), Standard Operating Procedures (SOPs), maintenance schedules and template forms used for record keeping.

The environmental risks arising from the paper sludge drying activity have been quantified in an Environmental Risk Assessment (Appendix A) in which the relevant controls have been summarised and an assessment has been made of the residual risk. This EMS Manual provides more detail with respect to the Environmental Risk Assessment and the controls associated with the identified risks.

This EMS Manual is a live document that will be reviewed and amended as necessary. The Operator has provided the information for this EMS and the Operator has been consulted to ensure it reflects site activities accurately.

2 Environmental Policy Statement

Robert Skelton Contractors Limited, herein termed 'the Operator,' recognise that if the drying of waste from pulp, paper and cardboard production and processing is not properly controlled and managed then the processes involved may pose risks to the environment, the amenity and human health.

With this in mind, the Operator will ensure the following is undertaken:

- Compliance with relevant National and European Union Legislation
- Assessment of the risks to people and the environment from its activities
- Implementation of adequate control measures to minimise harm to both people and the environment
- Review of control measures to ensure they are appropriate to minimise environmental risks
- Continual improvement in environmental performance wherever possible.

3 Non-Technical Summary

The operation is a waste treatment activity namely the drying of waste from pulp, paper and cardboard production herein termed ‘paper sludges’ to produce a dried material suitable for animal bedding.

The waste treatment activity constitutes the drying of wet paper sludge waste from paper mills on up to 4 No. drying floors utilising waste heat from 4 No. biomass boilers (which are operated under a Part B permit from Allerdale Borough Council, ref: PPC/ABC/B/26) on site.

Under normal operating conditions, only three of the drying floors will be used. The fourth drying floor has been included within the permit boundary and permit application such that it can be used as a contingency if there are any issues with individual boilers and / or drying floors.

The dried paper may be blended with sawdust (produced on site) to produce a material suitable for animal bedding or alternatively sold as a pure dried paper product.

In addition to the main waste treatment activity, there is associated waste storage prior to and after the waste treatment (drying).

There are no emissions to water from the site. Runoff from the area used to store the wet paper drains to a sealed sump with a float switch and submersible pump which pumps automatically out to a tank, the contents of which are removed off site and spread to land.

Dry paper is stored on an impermeable surface inside and there is no risk of runoff. All other areas of the site where there is no waste storage or treatment are designated as clean and discharge to the adjacent clay lined lagoon. When the lagoon is full it overflows to the Sepulchre Beck via a pipe. Under abnormal operations, if pollutants were to enter the lagoon, the discharge to the beck can be blocked off to retain water on site for removal by tankers.

There are no point source emissions to air. Fugitive emissions of dust are controlled by the fact that the drying floors are inside buildings with no through wind. Dust is further minimised through the appropriate storage of the dried paper sludge in bays within a building and by the covering of all waste loads in transit.

4 Details of Regulated Facility

4.1 Drying Floors

The 4 No. drying floors were constructed by the Operator using bespoke perforated sheeting. The technical specification for the sheeting is in Appendix B.

The specifications of the drying floors are appropriate for the drying of paper sludges in terms of moisture content, air permeability and physical structure.

4.2 Site Location

Address: New Hall Farm, Sunnyslack, Broughton Moor, Maryport, CA15 7RL

National Grid Reference: NY 06347 34442

Local Authority: Cumberland Council

4.3 Environmental Sensitivities

The site is outside any:

- Groundwater Source Protection Zone
- Drinking Water Safeguard Zone
- Drinking Water Protected Area[1]

The site is within an area designated as medium – low groundwater vulnerability.

The Sepulchre Beck runs approximately 110m to the south east of the proposed site boundary. This waterbody is within the Ellen (lower) Water Body which under the Water Framework Directive was classified as having a poor ecological status in 2019 and 2022.[2]

The site is within flood zone 1 has a low probability of flooding from rivers and the sea.[3]

The site is outside any Air Quality Management Areas.[4]

In response to a request for pre-application heritage and nature conservation screening (Ref: EPR/EP3922SL/P001 / Date:15/01/24), the Environment Agency confirmed that no habitats and/or protected species were identified that needed to be considered in the permit application.[5]

Human receptors within 1km of the site are shown in Table 1 below and on the Human Receptor (1km) Plan.

[1] https://magic.defra.gov.uk/MagicMap.aspx Accessed 12 February 2024
[2] https://environment.data.gov.uk/catchment-planning/WaterBody/GB112075073640 Accessed 26 February 2024
[3] https://flood-map-for-planning.service.gov.uk/ Accessed 12 February 2024
[4] https://uk-air.defra.gov.uk/aqma/maps/ Accessed 19 March 2024
[5] Heritage and Nature Conservation Screening Report, EPR/EP3922SL/P001, Environment Agency, 15/01/24

Table 1: Human Receptors (1km)

Receptor ID	Receptor name	Receptor type	Distance to site boundary (m)	Direction from site
H1	Harker Marsh houses	Residential	215	West north west
H2	Harker Marsh houses	Residential	225	North north west
H3	Florence House Adult Daycare Centre	Amenity / Workplace	545	North east
H4	Craika Road houses	Residential	515	North
H5	Shepherd Hall	Residential	560	South east
H6	North east of Broughton Moor	Residential	935	West south west
H7	Crooklands Farm	Residential	920	North west
H8	Fox House	Residential	960	South south east
H9	Moorside Farm	Residential	955	North north west
H10	Houses on Seaton Road	Residential	925	South west

The Operator and family live in houses within close proximity to the site. These houses are not classified as sensitive receptors in terms of amenity impacts and for that reason are not included in the table above.

4.4 Waste Activities

The Operator will not undertake any waste management activity unless it is specifically listed in Table 2 below:

Table 2: Permitted Activities

Description of activities	Limits of activities
R13: Storage of wastes pending any of the operations numbered R3 R3: Recycling/reclamation of organic substances which are not used as solvents	Treatment of non-hazardous waste through drying. Storage of 'wet' paper sludge (non-hazardous waste) on an impermeable pavement undercover with sealed drainage. Storage of 'dry' paper sludge (non-hazardous waste) including blended products on an impermeable pavement in a building.

4.5 Waste Type

The single waste type accepted for treatment has the following European Waste Catalogue code and description as shown in Table 3 below:

Table 3: Waste Type

Waste	Description
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 05	de-inking sludges from paper recycling

The waste type is an absolute non-hazardous waste in accordance with the List of Waste (England) Regulations 2005.[6]

4.6 Waste Properties

The 'wet' paper sludge has a dry matter content of in the range of 60-65%. The 'dry ' paper sludge has a dry matter content of approximately 95%.

4.7 Waste Quantity

The maximum treatment capacity of the plant is in the region of 30 tonnes per day across 4 No. drying floors. The maximum annual tonnage of waste will be 11,000 tonnes.

The maximum pile sizes and tonnages of wet and dry paper are detailed in Table 4 below and are also detailed in the Fire Prevention Plan **(SKE-OD-02).**

[6] http://www.legislation.gov.uk/uksi/2005/895/contents/made Accessed 19th March 2024

4.8 Site Layout & General Principles of Operation

Refer to:

- Site Plans – Paper Drying Layout Plan
- Appendix C – Process Flow Diagram
- Waste Acceptance & Rejection Procedure **(SKE-SOP-01**)
- Waste Handling & Management Procedure **(SKE-SOP-02)**.

4.8.1 Waste Reception

'Wet' paper sludge will be transported from the site of production (paper mills) to the Site in a covered trailer or lorry.

The waste broker has agreed that all drivers delivering 'wet' paper sludge will stop by the weighbridge and report to a Plant Operator before tipping on the designated concrete storage area inside the building. A Plant Operator will check the load as it is discharged.

The 'wet' paper sludge is tipped onto the concrete into a pile of no more than 12 metres by 4 metres by 2 metres high.

4.8.2 Waste Rejection Procedure

Due to the waste being of only one possible waste code all received through one waste broker, it is unlikely that unsuitable waste will be delivered to Site. In the unlikely event of an unsuitable waste load being identified, such as sludge that is so wet that it is non-stackable or malodorous waste then:

1. The Plant Operator overseeing the discharge of the load will instruct the driver that it is unsuitable and will oversee the reloading of the delivery vehicle.
2. The material will either be returned to waste producer or sent for waste disposal as appropriate.
3. The incident will be recorded in the Daily Checks **(SKE-MP-01).**
4. A Technically Competent Manager will contact the waste producer in order to agree a procedure to ensure that future loads are suitable for acceptance at the Site.

4.8.3 Wet Paper Storage

The maximum storage volume of 'wet' paper sludge will be 96m^3 or 96 tonnes based on a conservative conversion factor or 1,000 kg/m^3.

Under normal operating conditions, 'wet' paper sludge will be stored on the concrete pad for between 1-4 days. The maximum storage time will be 7 days.

4.8.4 Drying

A telehandler is used to scoop up the 'wet' paper sludge off the concrete slab and onto one of the 4 No. drying floors. A first in- first out procedure is employed.

Drying takes approximately 2 days. Drying floors 2 & 3 operate at approximately 32 ^{0}C. Drying floors 1 & 4 utilise heat at 85-95 ^{0}C. Despite the higher temperature the drying still takes approximately 2 days due to the lower fan speed from heat exchanger.

One load of 'wet' paper sludge weighs in the region of 28 tonnes and has a dry matter content of approximately 62%. A dried load weighs in the region of 19 tonnes and has a dry matter content of approximately 95%.

4.8.5 Dry Paper Storage

Once the paper is dry it is removed from the drying floor into the one of the two storage bays (one bay is filled at a time) using the telehandler. The bays are both 12m long and 7.6m wide. The waste is stored at a maximum height of 2m.

In the winter months, demand for dried paper is higher and dried paper leaves the site quickly due to high demand. In the summer months, demand for bedding materials is generally lower and dried paper material may be stored for up to 1 month (maximum 250 tonnes). Dried paper may be stored for up to 1 month.

4.8.6 Dried Paper Dispatch

A first in- first out procedure is employed.

Using a telehandler the dry paper sludge is loaded into covered trailers or covered lorries inside the shed thus minimising dust.

The loaded product then leaves the Site and goes to dairy farms where it is used as an absorbent animal bedding under the appropriate waste exemption.

Blending of dried paper sludge with sawdust to customer requirement may be carried out. This is carried out in the building. Ratios vary based on customer requirements. Blended products are made to order and are not stored.

Table 4: Summary of Waste Storage

Waste stream	Location	How is it stored	Max length (m)	Max width (m)	Max height (m)	Volume (m^3)	Max time it will be stored
Wet paper sludge	Covered yard	Single stockpile undercover	12	4	2	96	1 week
Dried paper bay 1	In building	Three sided concrete bay	12	7.6	2	182.4	1 month
Dried paper bay 2	In building	Three sided concrete bay	12	7.6	2	182.4	1 month
Blended product	Not stored – 'just in time' blending carried out	NA	NA	NA	NA	NA	NA

4.8.7 Site Security

There are 16 No. CCTV cameras linked to the operator's phone and a screen in the Site Office. The CCTV system has an alarm system to detect movement out of hours which is directed to the Site Manager's phone. The location of the CCTV cameras is shown on the Whole Site Layout Plan (see Site Plans).

The site owner who is the Site Manager lives on site and checks the site at least twice every day of the week; first thing in the morning and every night. If there are any issues with the boilers, an alarm is sent to the Site Manager's mobile phone. If the Site Manager is away then his brother, who lives 500m from the site entrance, checks the site.

5 Regulatory Controls

The Site planning permission has conditions which are regulated through the Local Authority (Allerdale Borough Council); the planning permission reference is FUL/2020/0032 and FUL/2020/0094. The 4 No. biomass boilers are operated under a Part B permit from Allerdale Borough Council, ref: PPC/ABC/B/26). Since 1 April 2023 Allerdale is now part of Cumberland Council Unitary Authority.

The Environmental Permit and any amenity issues will be regulated by the Environment Agency. The Environmental Permit for the operation will be regulated under the Environmental Permitting Regulations 2016.

All waste entering and leaving the Site are subject to controls under Duty of Care legislation (Environment Protection Act 1990, Section 34).

The Site will be subject to all Health and Safety regulation that applies to industry from a national perspective and will endeavour to operate within the constraints of the said regulations.

6 Physical Control Measures & Technical Standards

6.1 Control of Emissions to Surface Water and Groundwater

6.1.1 Fuels and Chemicals

There are oils and fuels within the telehandler and vehicles delivering and dispatching waste. Diesel for use in the mobile plant is stored in a bunded tank outside the permitted area. There is no chemical storage associated with this regulated facility.

6.1.2 Drainage

There are no emissions to water from the site. There is very little run off from the wet paper sludge storage area as it is undercover and the waste doesn't leach significantly. However, to contain any leachate that may arise the area drains to a sump with a submersible pump which automatically pumps out to a tank. The level in the tank is checked weekly (Weekly Checks **(SKE-MP-02)**) and if it is more than three quarters full the container is pumped out to a tanker and the liquid is spread to land as dirty water.

The dried paper and blended product storage areas have impermeable floors and are in the building, therefore there is no risk of runoff from these areas during normal operations. There is no risk of run-off from the 4 No. drying floors within the building.

All other areas of the site where there is no waste storage or treatment are designated as clean and discharge to the adjacent clay lined lagoon. When the lagoon is full it overflows to the Sepulchre Beck via an overflow pipe. The discharge pipe from the lagoon can be blocked off to retain water within it for tankering off-site. This is included within the Spillage Procedure **(SKE-SOP-03)** and the Fire Procedure **(SKE-SOP-04).**

6.1.3 Spillages

See Spillage Procedure **(SKE-SOP-03).**

6.2 Control of Emissions to Air

There are no point source emissions to air. See Section 8.1 Control of Dust.

7 Management

7.1 Staff Structure

The staff at the regulated facility are:

- Stuart Skelton – Site Manager who line manages:
    - Kathryn Clark - Technically Competent Manager
    - Site Foreman

7.2 Site Manager & Site Foreman

The Site Manager, Stuart Skelton has overall responsibility for the regulated facility and line manages the Site Foreman.

The Site Manager and the Site Foreman carry out day to day tasks including:

- Daily Checks **(SKE-MP-01)** & Weekly Checks **(SKE-MP-02)**
- Waste Acceptance (including waste rejection if appropriate) **(SKE-SOP-01)**
- Loading of drying floors using first in – first out principle in accordance with the Waste Handling and Management Procedure **(SKE-SOP-02)**
- Checking of drying floors **(SKE-SOP-02)**
- Removal of dried material **(SKE-SOP-02)**
- Blending of products as required
- Loading of material for dispatch using first in – first out principle **(SKE-SOP-02)**
- Overseeing maintenance of mobile plant
- Housekeeping tasks including sweeping yard and cleaning of drying floors.

7.3 Technically Competent Management

Kathryn Clark is the Technically Competent Manager (TCM) for the regulated facility. On the 24 January 2024 she was issued with an Environmental Permitting Operator's Certificate (EPOC). She is enrolled and in the process of attaining MROC1 award with WAMITAB which is a Level 4 Medium Risk Operator Competence for Non-Hazardous Waste Treatment and Transfer.

The Operator may train or employ further TCMs; the Environment Agency will be notified should this happen.

The Site will be supervised by the TCM for at least 15% of operational hours or otherwise as agreed with the Environment Agency. This minimum attendance requirement has been calculated in accordance with the online Environment Agency guidance 'Legal Operator and Competence Requirements: Environmental Permits'[7].using the Site Operational Risk Appraisal (OPRA) score and banding as submitted with the permit variation and transfer application, which this EMS accompanies.

The minimum attendance requirement calculation is shown in Table 5 below:

[7] https://www.gov.uk/guidance/legal-operator-and-competence-requirements-environmental-permits Accessed 20 March 2024

Table 5: TCM Minimum Attendance Requirement Calculation

Aspect	OPRA category	Associated points
Complexity (waste operation)	A	1
Location	B	2
Emissions	B	2
		TOTAL = 5 points which equates to 15% minimum attendance

The TCMs will sign in/out of the Site Diary each time he/she attends Site.

The TCM is responsible for:

- Ensuring that operational and TCM attendance hours are recorded;
- Carrying out site checks with respect to environmental and health and safety controls;
- Duty of care checks for waste loads entering and leaving the site;
- Relevant training for staff;
- Ensuring that incidents, accidents and complaints are recorded and reported as appropriate and that mitigations are actioned; and
- Maintenance of fire extinguishers and fixed electrics.

7.4 Staff Training

All staff receive training on relevant Standard Operating Procedures and management plans.

The details of the TCM training are in Section 7.3 above.

Training records for staff are kept in the Site office.

7.5 Operations Management

7.5.1 Daily Checks

The Site Manager or Site Foremen carry out the following daily checks and record them in Daily Checks **(SKE-MP-01**):

- Waste storage is secure and within limits; tidy up dirty areas with yard brush if needed, reduce stack heights /pile sizes as necessary.
- Check for any leaks and spills.
- Temperature monitoring of stacks as per the Fire Prevention Plan **(SKE-OD-02)**
- Fire Watch every four hours and at the end of the working day.
- Even distribution of material on the drying floors (around 18 inches thick) in accordance with Waste Handling & Management Procedure **(SKE-SOP-02).**
- Fixed and mobile plant maintenance is carried out as per maintenance schedules and recorded as necessary.

- Checking and cleaning telehandler as required.
- There are no amenity impacts arising; odour, noise, dust or litter.

7.5.2 Weekly Checks

The Site Manager or nominated competent person will perform weekly checks at the regulated facility and record in Weekly Checks **(SKE-MP-02**):

- Check on Site Security measures; CCTV cameras
- Check maintenance of mobile and fixed plant is up to date.
- Check level in tank taking run-off from wet paper storage. Arrange to be emptied if more than three quarters full.

7.5.3 Maintenance Plan

All fixed and mobile plant is subject to a maintenance plan in line with the manufacturers' recommendations.

The dryer floors are fully cleaned out and checked twice a year. This is recorded in the Site Diary.

Mobile plant on site:

- Telehandler for moving waste around on site
- Fastrac and trailer for dried paper dispatch

The telehandler is inspected and cleaned as necessary on a daily basis. Dust, waste and fluff are removed to help minimise the risk of an electric fire. The telehandler is inspected and maintained as per a JCB maintenance schedule based on hours run (every 1,000 hours) by a qualified mechanic. This is recorded in the Maintenance Book held in the Site Office.

The Fastrac is inspected and maintained in line with run hours. In addition, there is a contract in place such that if there are any error codes on the machine a mechanic will come out within the day to resolve the issue.

The trailer is serviced through its warranty program.

Any issues that are detected during routine maintenance or outside routine maintenance will be repaired as soon as practicably possible by a trained mechanic. All maintenance and repair work are recorded in the Maintenance Book, held in the Site Office.

7.6 Accident / Incident Prevention & Management Plan

7.6.1 Reporting of Accidents & Incidents

To aid reporting of accidents and incidents:

1. A notice board will be displayed near the site entrance including the following details:

New Hall Farm Paper Drying Plant, Robert Skelton Contractors Limited
Permitted by the Environment Agency, Permit number EPR/EP3922SL
Site Contact –Site Manager, Stuart Skelton – 07802 939683
Environment Agency Incident Hotline - 0800 807060

2. An up-to-date list of Key Emergency Contacts will be maintained and displayed in the Site Office.

7.6.2 Accident / Incident Prevention & Management Plan

The accident and incident prevention and management plan is detailed in Table 6 below.

Table 6: Accident / Incident Prevention & Management Plan

Possible Accident / Incident	Likelihood of occurrence	What would the environmental harm be?	How do we reduce the chances of it happening?	What to do if it happens
Spillage of fuel or oil from waste delivery / collection vehicles, plant and equipment including fixed plant.	Low	Contamination of land, drains, groundwater and water courses. Contamination of land unlikely as the vehicle movement areas are concreted. Any spillages could be contained on the concrete and cleared up. Worst case scenario the spillage would reach the lagoon which would be closed off so that the spillage could be contained and remediated.	Delivery of waste overseen. Daily checks **(SKE-MP-01)** Absorbent materials to soak up spillages on site. Plant and equipment are maintained regularly and in line with manufacturer's guidance.	Spillages will be dealt with in accordance with Spillage Procedure **(SKE-SOP-03)**
Spillage of 'wet' paper sludge or dried paper sludge	Low	As above	Delivery of waste overseen. Training of Site Foreman and Plant Operators in use of	Spillages will be dealt with in accordance with Spillage Procedure **(SKE-SOP-03)**

Possible Accident / Incident	Likelihood of occurrence	What would the environmental harm be?	How do we reduce the chances of it happening?	What to do if it happens
			plant and equipment. Daily checks **(SKE-MP-01)**	
Fire	Low	Smoke and pollution. Smoke could impact nearby residents. Fire water could impact watercourse.	In accordance with Fire Prevention Plan **(SKE-OD-02):** Operate plant strictly in accordance with manufacturer instructions. Smoking is not permitted on Site.	See Fire Prevention Plan **(SKE-OD-02)** & Fire Procedure **(SKE-SOP-04)**
Flood due to ingress of watercourse floodwater, or fire water.	Very low	Contamination of land, drains, groundwater and water courses. Very low risk of this occurring as: The Site is not located within an area prone to flooding. Small risk of flood from fire water	Prevention of fires (see above)	Fire Procedure **(SKE-SOP-04)** which includes shutting off outlet from lagoon and arranging tankers to remove water from lined lagoon to a suitably permitted site with immediate effect.
Storms causing damage to site infrastructure and release of waste	Very low	As above	Ensure waste storage within limits and stored securely.	See above spillage of 'wet' or dried paper sludge
Vandalism - unauthorised entry, tampering or malicious damage to property, plant and equipment	Low	Contamination of ground by fuel or oil Fire – fire water As above	All visitors have to sign into the Site. Site is secured through CCTV & operator living onsite	Spillages will be dealt with in accordance with Spillage Procedure **(SKE-SOP-03)** & fires in accordance with Fire Procedure **(SKE-SOP-04)**

7.6.3 Actions in the Case of All Accidents & Incidents

If an accident does happen and it may cause an adverse environmental impact, the operator will:

1. Immediately do what it says in the Accident / Incident Management Plan.
2. Do whatever else is necessary to minimise the environmental consequences.
3. Take all precautions to ensure the health and safety of both employees and external people is not compromised.
4. Notify the Environment Agency and / or Fire Service as appropriate.
5. Find out why the accident happened and mitigate the risk of it happening again.
6. Make a record of the accident and the subsequent investigation and mitigation on an Accident and Incident Report Form **(SKE-FT-01)**.
7. Review the Accident / Incident Management Plan as necessary

7.7 Complaint Policy & Procedure

It is important to Robert Skelton Contractors Limited to be a good neighbour and to ensure that all of the activities at New House Farm Paper Drying Plant, including the waste activities, do not have an adverse effect on the local community.

Robert Skelton Contractors Limited are committed to ongoing engagement with the local community. If any activity is scheduled which may have a negative impact on the local community, then neighbours will be contacted to communicate plans with as much notice as possible. There will be a Site Notice Board in place to include contact details for in and out of office hours for Robert Skelton Contractors Limited and the Environment Agency.

All complaints will be fully investigated. Action will be taken to rectify the situation as necessary and as soon as possible and to let the complainant know what this action has been.

This will all be recorded on a Complaints Record Form **(SKE-FT-02),** the completed forms will be held in the Site Office.

7.8 Contingency Planning

If the drying capacity is unduly limited due to unscheduled maintenance or breakdown of the biomass boilers / mains power is down or if the maximum waste storage capacity (as specified in Table 4, Section 4.8 and the Fire Prevention Plan **(SKE-OD-02**)) may be compromised, the Operator will ensure that no further waste loads are accepted for treatment.

Under normal operations only three of the drying floors will be used. The fourth drying floor has been included within the permit boundary and permit application such that it can be used as a contingency if there are any issues with individual boilers and / or drying floors.

All of the waste accepted on site comes from a single waste broker and directly from the site of production. The Operator is not tied into a contract with the waste broker and can stop waste acceptance at any time.

The Operator will stop accepting waste for treatment in the case of;

- Exceedance of waste storage limit;
- Prolonged breakdown of biomass boilers producing heat;
- Accidents that may result in pollution to the environment; and
- Staff shortages.

In the event of an accident the Operator will follow the procedures in the Accident / Incident Prevention & Management Plan (see Section 7.6.2).

7.9 Review of Management System

The EMS will be reviewed and updated as necessary, in the following circumstances:

- When there are changes to the Site, operations or equipment that affect the activities covered by the environmental permit;
- When an application is made to vary the environmental permit;
- After any accident, complaint or breach of environmental permit; and
- If a new environmental problem or issue arises and new control measures have been implemented to control it.

A record will be kept of any changes made to the EMS.

8 Amenity Impacts & Controls

8.1 Control of Dust

See Dust Management Plan **(SKE-OD-03)**

8.1.1 Existing Controls

All loads of paper sludge coming in and out of the Site are in enclosed or covered vehicles. All vehicle movements including access to the Site from the highway is on hardstanding or concrete. The access road and site are swept as necessary which acts to minimise dust being raised from vehicle movements.

Dust is controlled during the waste treatment process as the drying floors are inside the building and the doors to the individual drying floors can be closed.

Dried paper sludge is stored and loaded in a building thus reducing the risk of windblown dust arising from waste storage and handling.

There is a site speed limit of 5 miles per hour.

8.1.2 Monitoring & Additional Controls

Dust is monitored daily at the site boundary downwind; Daily Checks **(SKE-MP-01).** This frequency will be increased in dry conditions.

If dust is detected then the yard and / or access road will be dampened down using a hose. Dust will then be monitored for again and further dampening down will be carried out as necessary. If dampening down is not found to be effective the operation creating dust will be temporarily halted until effective corrective action has been taken.

8.2 Control of Noise & Vibration

The potential sources of noise and vibration from the permitted operation and associated controls are:

1. Vehicles delivering 'wet' paper to the Site and collecting dried paper sludge.
2. Vehicles moving around the Site e.g. loading or unloading the drying floors
    - All vehicles used at the Site are maintained in good efficient working order.
    - Machines in intermittent use are shut down or throttled down in the intervening periods when not in use or throttled down to a minimum.

The drying floors themselves are not a source of noise. The biomass boilers are regulated by the local council under a Part B permit.

All vehicles coming to site are told to contact site before arriving and are directed in via the Heavy Good Vehicles (HGV) access to the south west of the site and not through Harker Marsh village. All vehicles except one dispatching dried paper are operator owned, and all use the dedicated HGV route to the south west of the site.

There are approximately five HGV movements per day and there is an enforced site speed limit of 5 miles per hour.

Given the control measures in place, it is not anticipated that noise from the permitted activities will be an issue. Noise is monitored daily; Daily Checks **(SKE-MP-01).** If noise and or vibration is found to have an impact on the local amenity then a Noise and Vibration Management Plan will be written and actioned.

8.3 Control of Mud

There is the potential for mud to be tracked out of the Site by vehicles although this is a low risk as all vehicle movements including access to the Site from the highway is on concrete or hardstanding. The hard standing track for HGV access is approximately 900m long and regularly maintained. The yard is checked daily and swept if required. In the unlikely event that there is mud on the road a yard sweeper belonging to the farm will be used.

8.4 Control of Pests & Scavengers

It is unlikely that the waste types will attract pests or scavengers. A local pest control company make regular visits to site to check and reduce any pests or vermin. Records of the visits are kept in the Site Office.

8.5 Control of Litter

Due to the nature of the waste being treated, litter associated with the permitted activities is not anticipated. The Environmental Risk Assessment (Appendix A) concludes that the overall risk of litter impacting the local human population, livestock and wildlife is low.

Any litter arising will be detected during Daily Checks **(SKE-MP-01**). All waste will be stored securely and disposed of appropriately.

8.6 Control of Odour

The permitted waste types, waste acceptance and waste rejection procedures act to restrict the acceptance of odorous waste into the Site. Whilst the wet paper sludge may be odorous, it is stored within a building. The odour potential of the waste treatment activity is limited due to the drying floors being inside a building. The closest sensitive receptors to the site are houses in Harker Marsh 215m north west of the Site. The Environmental Risk Assessment (Appendix A) concludes as a result of these factors that the overall risk of odour impacting the local human population is low.

The Operator confirms that there have not been any complaints about odour from the Site.

Odour is monitored daily; Daily Checks **(SKE-MP-01)**. If odour is detected off-site or if notified by the Environment Agency that the activities are giving rise to pollution outside the Site due to odour, the Operator will submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour and implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

9 Site Records

9.1 Site Diary

A Site diary is kept in the Site office and will be available for inspection when required by an authorised officer of the Environment Agency. The site diary shall include a record of the following events:

- Maintenance (other than that in Maintenance Book)
- Breakdowns
- Emergencies
- Any problems with waste received and action taken
- Site inspections
- Operational hours & the attendance of Technically Competent Management
- Environment problems and remedial actions.

9.2 Check Sheets

The following completed forms are kept in the Site Office:

- Daily Checks **(SKE-MP-01)**
- Weekly Checks **(SKE-MP-02)**
- Temperature Monitoring Log Forms **(SKE-FT-03)** used to record the temperature of dry paper if stored longer than 2 weeks.

9.3 Abnormal Events

Environmental incidents will be recorded on the Accident & Incident Report Form **(SKE-FT-01)**.

Complaints and subsequent investigation all be recorded on a Complaints Record Form **(SKE-FT-02)**. The completed forms will be held in the Site Office.

9.4 Records of Waste Movement

A record will be kept of all waste received at the Site. The record shall include the following details:

- Date and time of delivery
- Origin of waste
- Nature of waste received including European Waste Catalogue code
- Quantity of waste
- Driver name
- Vehicle registration.

Duty of Care Waste Transfer Notes will be kept on Site for a minimum of 2 years.

Quarterly waste tonnage returns will be submitted to the Environment Agency as stipulated by the Environmental Permit.

10 Management System Documents

The management system documents relevant to operational control are Overarching Documents (ODs) including management plans, Standard Operating Procedures (SOPs), monitoring and maintenance schedules and the record keeping forms associated with the SOPs (Form templates or FTs).

The documentation associated with the management system is presented in a consistent format including:

- Title of document
- Document reference in the format SKE-YYY-NN where:
    - 'YYY' is:
        - OD denoting an Overarching Document, for example a management plan
        - SOP is a Standard Operating Procedure
        - MP is a Monitoring and / or Maintenance Schedule.
        - FT is a form template used to make records
    - 'NN' is a unique number to identify the document.
- Document author / name of person who issued the document.
- Version number
- Date of issue

Table 7 below lists the management system documents relevant to operational control

Table 7: Management System Documents

Document reference	Document title
Overarching documents	
SKE-OD-01	Environmental Management System Manual (this document)
SKE-OD-02	Fire Prevention Plan
SKE-OD-03	Dust Management Plan
Standard Operating Procedures	
SKE-SOP-01	Waste Acceptance & Rejection Procedure
SKE-SOP-02	Waste Handling & Management Procedure
SKE-SOP-03	Spillage Procedure
SKE-SOP-04	Fire Procedure
Monitoring and / or Maintenance Schedule	

Document reference	Document title
SKE-MP-01	Daily Checks
SKE-MP-02	Weekly Checks
Form templates	
SKE-FT-01	Accident & Incident Report Form
SKE-FT-02	Complaints Record Form
SKE-FT-03	Temperature Monitoring Log Form

Site Plans

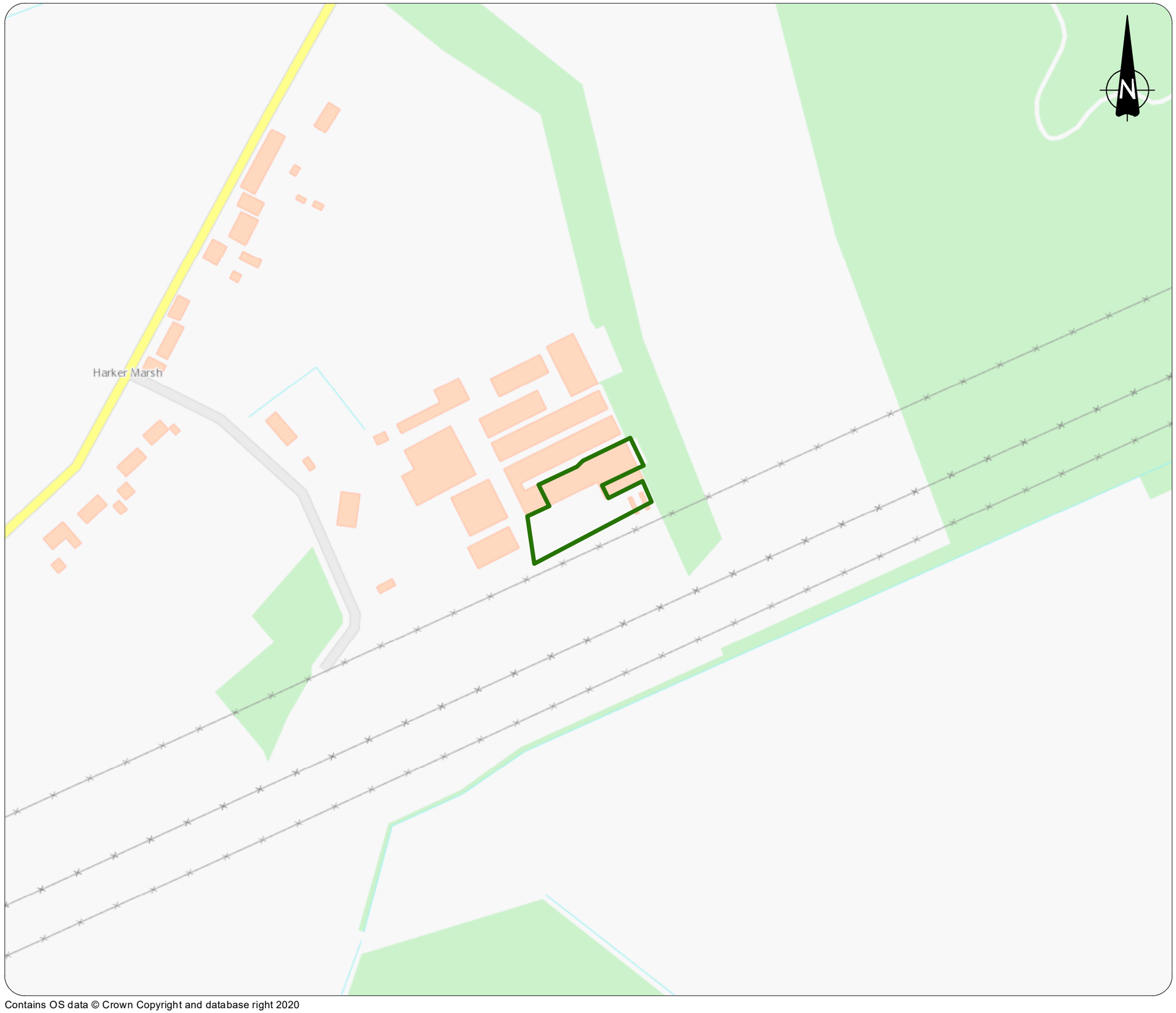
Site Location Plan (SPC0130/LocationPlan/Rev A)

Permitted Boundary Plan (SPC0130/BoundaryPlan/Rev A)

Human Receptor (1km) Plan (SPC0130/HumanReceptor(1km)/Rev A)

Whole Site Layout Plan, V1,0 May 2024

Paper Drying Layout Plan, V1.0 May 2024



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REVISIONS

REV	DATE	DESCRIPTION	DWN	CHK	APP
A	11/05 2024	First Issue	JJ	ESP	ESP

LEGEND

Permit Boundary

0 50 100 m

Scale at A3: 1:2,500

Client
Robert Skelton Contractors Limited

Project
New Hall Farm Paper Drying Plant Permit Application

Title
Site Location Plan

SHANN PITTS CONSULTING

Westbrook Farm
Westbrook
Gillingham
Dorset SP8 5DT

Tel: 07866024096

emily@shannpittsconsulting.co.uk
www.shannpittsconsulting.co.uk

Drawn	Checked	Approved	Revision
JS	ESP	ESP	A

Date	Scale	Sheet Size
May 2024	1:2,500	A3

Drawing Number	File Reference
SPC0130/LocationPlan/Rev A	SPC130.mxd

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REVISIONS

REV	DATE	DESCRIPTION	DWN	CHK	APP
A	11/05 2024	First Issue	JJ	ESP	ESP

LEGEND

Permit Boundary

0 10 20 m

Scale at A3: 1:500

Client
Robert Skelton Contractors Limited

Project
New Hall Farm Paper Drying Plant Permit Application

Title
Permitted Boundary Plan

SHANN PITTS CONSULTING

Westbrook Farm
Westbrook
Gillingham
Dorset SP8 5DT

Tel: 07866024096

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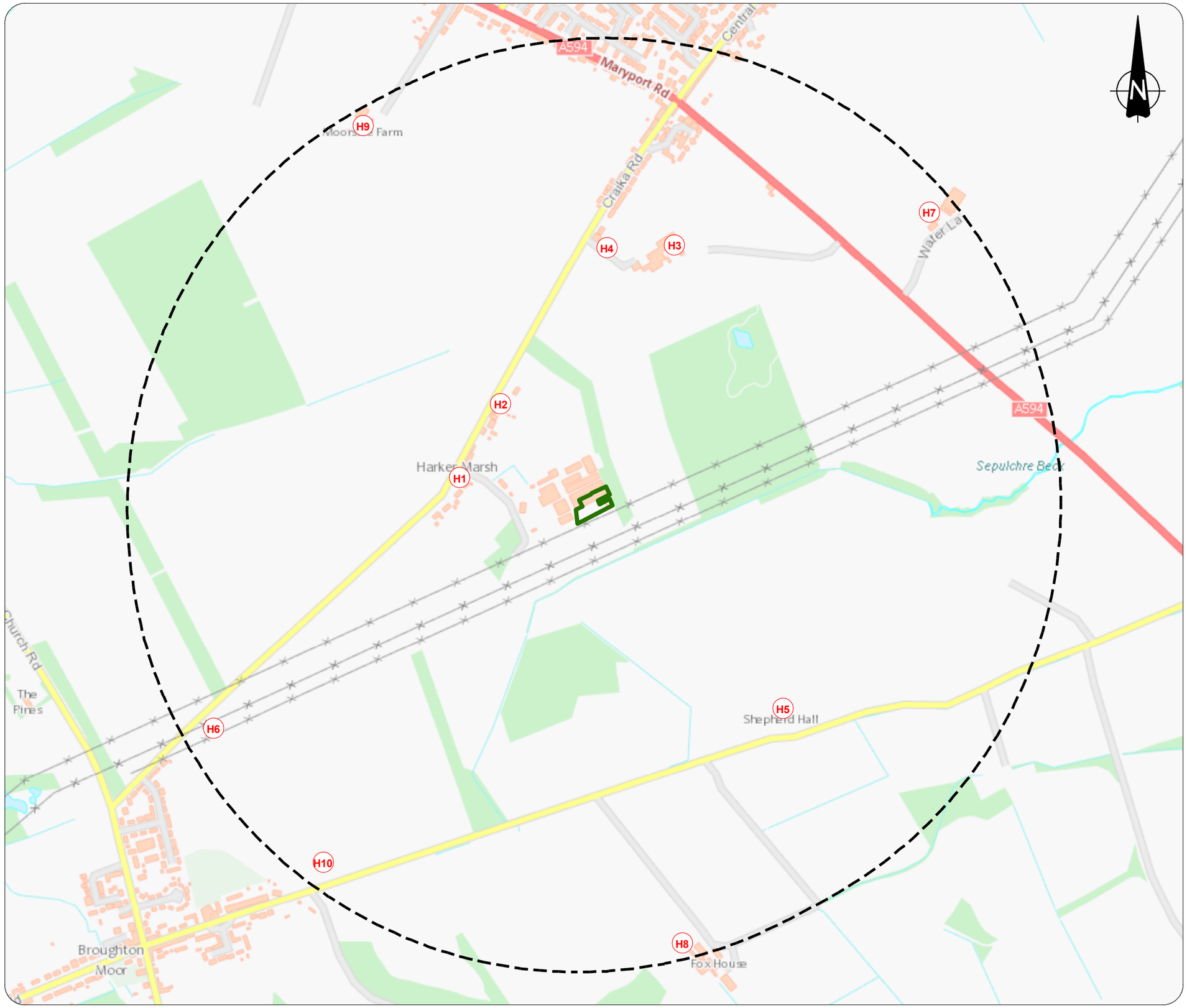
www.shannpittsconsulting.co.uk

Drawn	Checked	Approved	Revision
JS	ESP	ESP	A

Date	Scale	Sheet Size
May 2024	1:500	A3

Drawing Number	File Reference
SPC0130/BoundaryPlan/Rev A	SPC130.mxd



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REVISIONS

REV	DATE	DESCRIPTION	DWN	CHK	APP
A	11/05 2024	First Issue	JJ	ESP	ESP

LEGEND

- Permit Boundary
- Permit Boundary 1km Buffer
- (H) Human Receptor

0 100 200 300 400 m

Scale at A3: 1:8,500

Client: Robert Skelton Contractors Limited

Project: New Hall Farm Paper Drying Plant Permit Application

Title: Human Receptors Plan

SHANN PITTS CONSULTING
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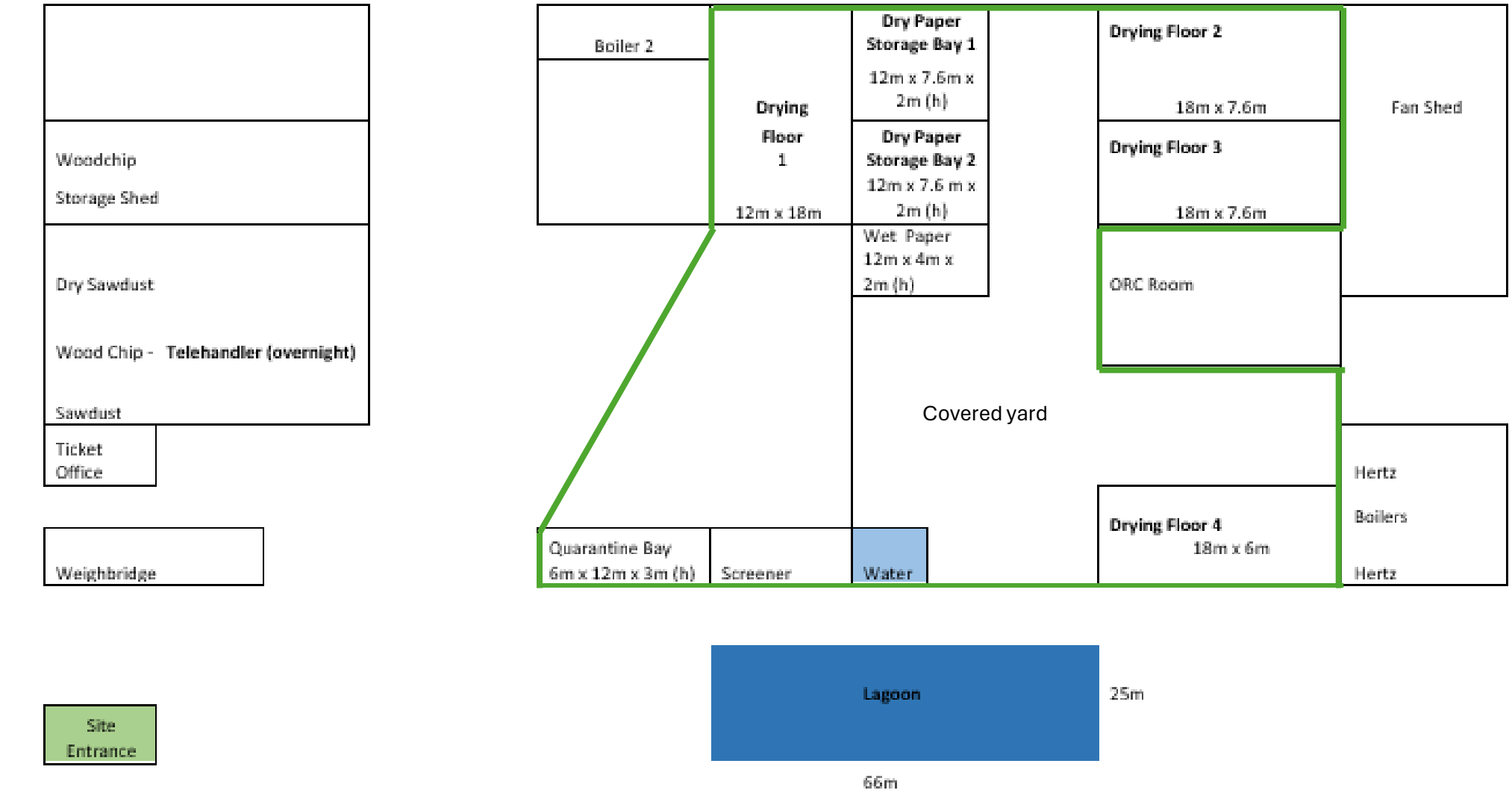
Drawn	Checked	Approved	Revision
JS	ESP	ESP	A

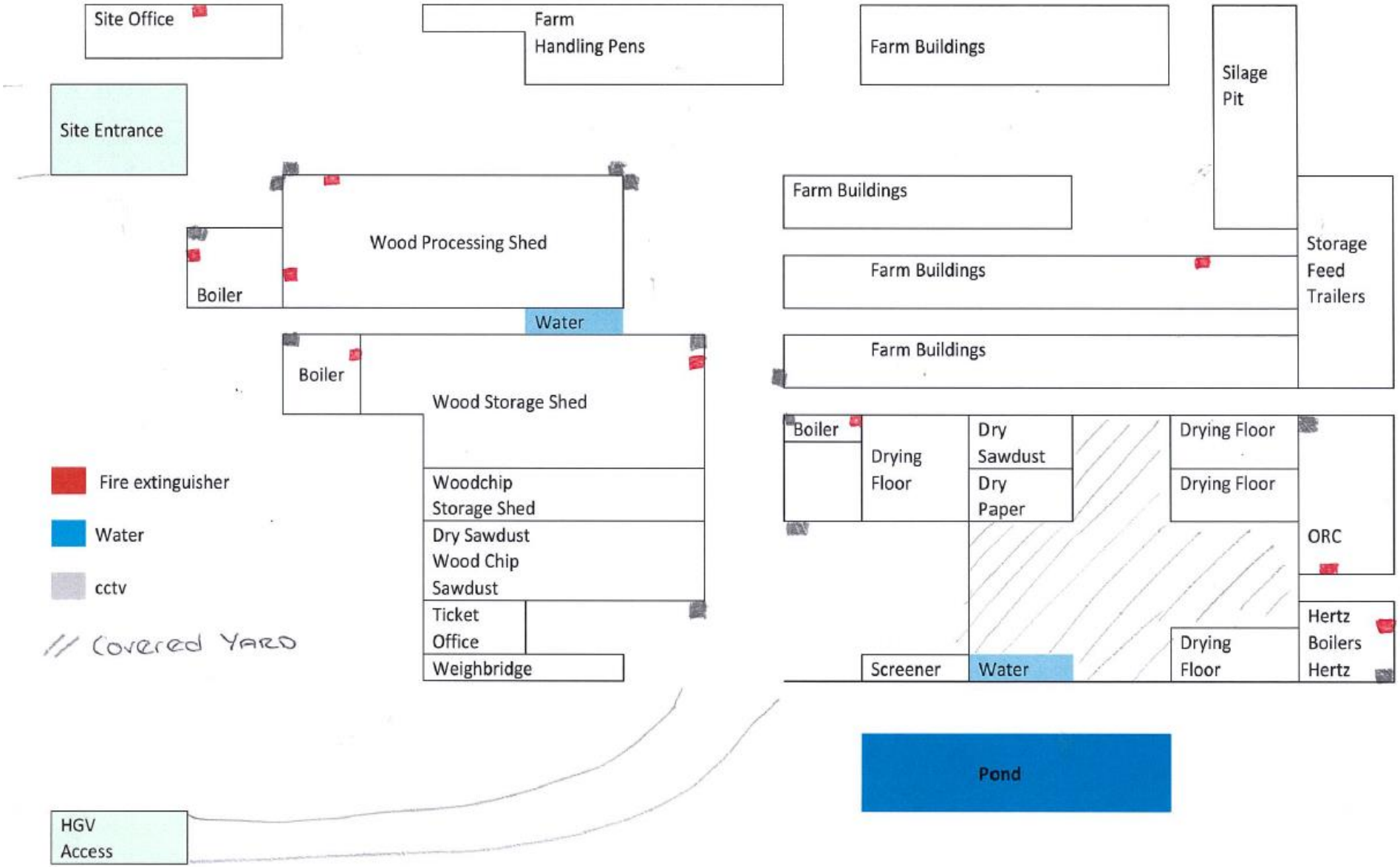
Date	Scale	Sheet Size
May 2024	1:8,500	A3

Drawing Number	File Reference
SPC0130HumanReceptor(1km)Rev A	SPC130.mxd

New Hall Farm Paper Drying Plant - Paper Layout Plan, V1.0, May 2024



New Hall Farm Paper Drying Plant – Whole Site Layout Plan, V1.0, May 2024



Appendix A - Environmental Risk Assessment

Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management?
Local human population	Releases of particulate matter (dusts)	Harm to human health - respiratory irritation and illness.	Air transport then inhalation.	Medium	High	**Medium**	The dried paper material has the potential to generate windblown dust. The entire site benefits from an impermeable surface which limits dust raising from vehicles. All waste treatment is carried out on drying floors which are enclosed on three sides and within a building. Dried paper is stored in dedicated bays which are enclosed on three sides and are within a building. The loading of dried paper for dispatch is carried out in the building. Local residents may be sensitive to dust. The site is approximately 215m from the nearest sensitive receptors in Harker Marsh.	Adhere to the management system controls through staff training: • Ensure that the Dust Management Plan **(SKE-OD-03)** is adhered to through training of staff and revised and improved if required. • Ensure that daily checks for dust are carried out Daily Checks **(SKE-MP-01)** and with an increased frequency in dry weather and mitigation measures including dampening down employed as required. • Follow Waste Handling and Management	**Low**

Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequences be if this occurs?**	**What is the overall magnitude of the risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of the risk after management?**
								Procedure **(SKE-SOP-02)**	
Local human population	Releases of particulate matter (dusts)	Nuisance - dust on cars, clothing etc.	Air transport then deposition	Medium	Medium	**Medium**	As above	As above	**Low**
Local human population, livestock and wildlife.	Litter	Nuisance, loss of amenity and harm to animal health	Air transport then deposition	Low	Medium	**Low**	The waste material doesn't generally contain any litter. As per controls for dust above. Local residents may be sensitive to litter. The site is approximately 215m from the nearest sensitive receptors in Harker Marsh.	As above for control of dust. There will be a daily walk around and litter pick as part of the Daily Checks **(SKE-MP-01).**	**Low**
Local human population	Waste, litter and mud on local roads	Nuisance, loss of amenity, road traffic accidents.	Vehicles entering and leaving site.	Low	Medium	**Low**	Mud is very unlikely due to the nature of the waste that will be accepted and the fact that the entire site including the haul road benefits from a hard surface.	As above for litter. No further controls required for mud.	**Low**
Local human population	Odour	Nuisance, loss of amenity	Air transport then inhalation.	Low	Medium	**Low**	The wet paper material has the potential to be	Adhere to the management system	**Low**

Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management?
							odorous both in storage and when being dried. Wet paper is stored in a building and the drying takes place in a building. Local residents may be sensitive to odour. The site is approximately 215m from the nearest sensitive receptors in Harker Marsh.	controls through staff training: • The Waste Acceptance and Rejection Procedure **(SKE-SOP-01)** acts to restrict the acceptance of odorous waste into the Site. • The Waste Handling and Management Procedure **(SKE-SOP-02)** ensures wet paper is processed on a first-in first-out principle. If required an Odour Management Plan will be implemented.	
Local human population	Noise and vibration	Nuisance, loss of amenity, loss of sleep.	Noise through the air and vibration through the ground.	Low	Medium	**Low**	All vehicles coming to site are told to contact site before arriving and are directed in via the Heavy Good Vehicles (HGV) access to the south west of the site and not through Harker Marsh	Planned preventative inspection and maintenance of plant and equipment in line with Environmental Management System.	**Low**

Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management?
							village. There are approximately 5 HGV movements a day. The drying floors themselves are not a source of noise. The biomass boilers are regulated by the local council under a Part B permit. Local residents may be sensitive to noise. The site is approximately 215m from the nearest sensitive receptors in Harker Marsh.	If required a Noise Management Plan will be implemented.	
Local human population	Scavenging animals and scavenging birds	Harm to human health - from waste carried off site and faeces. Nuisance and loss of amenity.	Air transport and over land	Low	Medium	**Low**	Permitted wastes are unlikely to attract scavenging animals or birds.	Adhere to the management system controls: • A local pest control company make regular visits to site to check and reduce any pests or vermin. • Records of the visits are kept in the Site Office.	**Low**

Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequences be if this occurs?**	**What is the overall magnitude of the risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of the risk after management?**
Local human population	Pests (e.g. flies)	Harm to human health, nuisance, loss of amenity	Air transport and over land	Low	Medium	**Low**	Permitted wastes are unlikely to attract pests.	As above	**Low**
Local human population and local environment	Flooding of site	If waste is washed off site it may contaminate buildings / gardens / natural habitats downstream.	Flood waters	Low	Medium	**Low**	The site is within flood zone 1 has a low probability of flooding from rivers and the sea. Any runoff from the site would enter the clay lined lagoon and could be contained and removed from site. There is sufficient containment on site to store fire water in accordance with the Fire Prevention Plan **(SKE-OD-02)**.	Staff training on: Fire Prevention Plan including waste separation, fire watches and maximum pile sizes. Fire Procedure **(SKE-SOP-04)** which includes blocking off outlet from lagoon and arranging for tankers to come to site to remove fire water.	**Low**
Local human population and / or livestock after gaining unauthorised access to the waste operation	All on-site hazards: wastes; machinery and vehicles.	Bodily injury	Direct physical contact	Low	Medium	**Low**	Site security measures in place: • There are 16 No. CCTV cameras linked to the operators phone. The location of the CCTV cameras is shown on the Whole Site Layout Plan.	Site security measures will be checked weekly as part of the site Environmental Management System and any repairs made as soon as practicably possible. Weekly Checks **(SKE-MP-02)**	**Low**

Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management?
							• The site owner who is the Site Manager lives on site and checks the site twice every day of the week; first thing in the morning and every night. If there are any issues with the boilers, an alarm is sent to the Site Managers mobile phone. If the Site Manager is away then his brother checks the site who lives 500m from the site entrance.		
Local human population and local environment.	Arson and / or vandalism causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff, firefighters or arsonists/vandals. Pollution of water or land.	Air transport of smoke. Spillages and contaminated firewater by direct run-off from site and via surface water drains and ditches.	Low	High	**Medium**	As above	As above	**Low**

Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequences be if this occurs?**	**What is the overall magnitude of the risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of the risk after management?**
Local human population and local environment	Accidental fire causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff or firefighters. Pollution of water or land.	As above.	Low	High	**Medium**	Combustible waste is stored and treated on site.	Ensure that the Fire Prevention Plan **(SKE-OD-02)** is adhered to through staff training.	**Low**
All surface waters close to and downstream of site.	Spillage of liquids, leachate from waste, contaminated rainwater run-off from waste e.g. containing suspended solids.	Chronic effects: deterioration of water quality	As above. Indirect run-off via the soil layer	Low	Medium	**Low**	Any runoff from the site would enter the clay lined lagoon and could be contained and removed from site. The Sepulchre Beck runs approximately 110m to the south east of the proposed site boundary. There is very little run off from the wet paper sludge storage area as it is undercover and the waste doesn't leach significantly. Dry paper is stored on an impermeable surface undercover and there is no run off during normal operations.	Adhere to the management system controls: • Ensure that waste is only stored in designated areas in accordance with Daily Checks **(SKE-MP-01)**. • Ensure that sump in covered yard is checked daily and the associated tank is checked weekly emptied when it is more than three quarters full. • Routine checks and repairs as required on concrete	**Low**

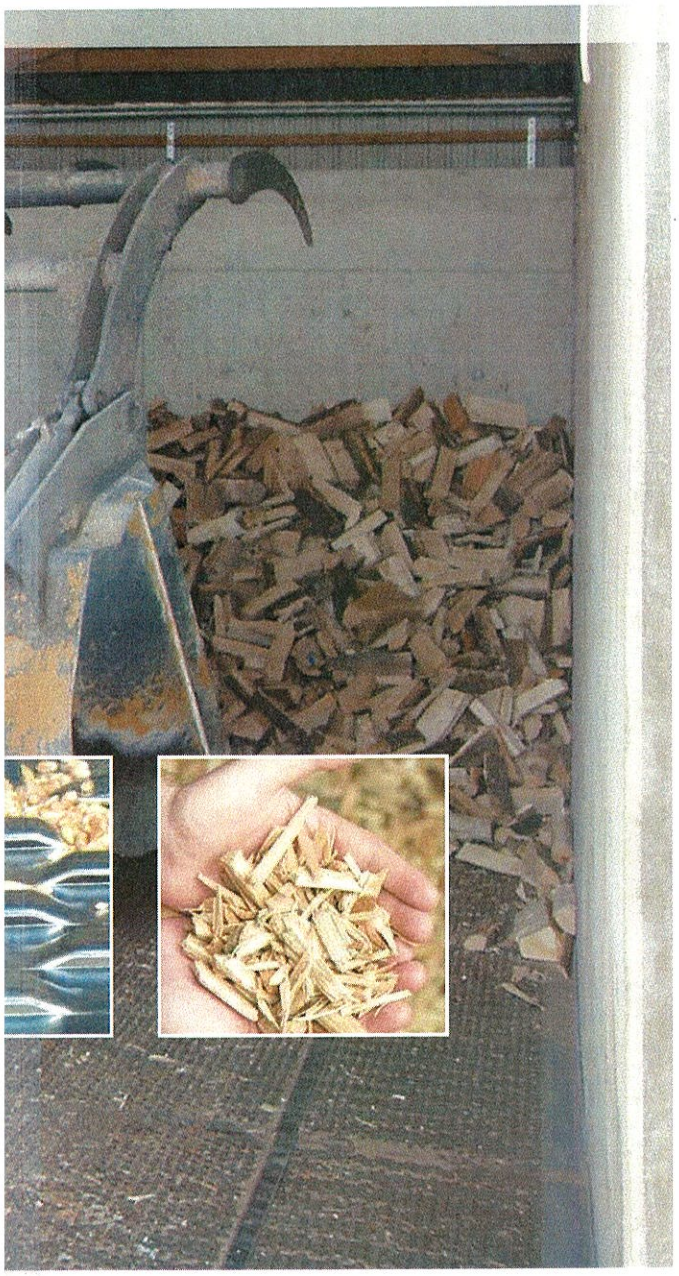
Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequences be if this occurs?**	**What is the overall magnitude of the risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of the risk after management?**
								surfacing and drainage system. • Ensure that any spillages are managed in accordance with the Spillage Procedure **(SKE-SOP-03)**.	
Abstraction from watercourse downstream of facility (for agricultural or potable use).	Spillage of liquids, leachate from waste, contaminated rainwater run-off from waste e.g. containing suspended solids.	Acute effects, closure of abstraction intakes.	Direct run-off from site across ground surface, via surface water drains, ditches etc. then abstraction.	Low	Medium	**Low**	As above	As above	**Low**

Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequences be if this occurs?**	**What is the overall magnitude of the risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of the risk after management?**
Groundwater	Spillage of liquids, leachate from waste, contaminated rainwater run-off from waste e.g. containing suspended solids.	Chronic effects: contamination of groundwater, requiring treatment of water or closure of borehole.	Transport through soil/groundwater then extraction at borehole.	Low	Medium	**Low**	As above. The site is within an area designated as medium – low groundwater vulnerability. The site is not within a Groundwater Source Protection Zone, a Drinking Water Safeguard Zone nor is it within a Drinking Water Protected Area.	As above	**Low**
Local human population	Contaminated waters used for recreational purposes	Harm to human health - skin damage or gastro-intestinal illness.	Direct contact or ingestion	Low	Medium	**Low**	As above	As above	**Low**
Protected sites - European sites and SSSIs	Any	Harm to protected site through toxic contamination, nutrient enrichment, smothering,	Any	Low	Medium	**Low**	There are no statutory designated sites within 500m of the site. There are no point source emissions to air. Dust will be controlled (see Control of Dust).	Ensure that Dust Management Plan **(SKE-OD-03)** is adhered to through staff training.	**Low**

Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management?
		disturbance, predation etc.							

Magnitude of Risk	Consequence		
Probability of Exposure	Low	Medium	High
Low	Very Low	Low	Medium
Medium	Low	Medium	Medium
High	Medium	Medium	High

Appendix B – Technical Specification of Perforated Sheeting (Drying Floors)



BRIDGE SLOT AND AGRICULTURE – A PERFECT MATCH

Bridge slot screens from RMIG offer the perfect solution for drying floors. We can help you lay the foundation for producing high quality products for the agriculture industry.

If fine-grained materials are to be dried or stored, small openings with a maximum open area are required. Bridge slot holes offer this. These screens not only guarantee a large area air flow – the shape of the punch can allow for material thicknesses of up to 5 mm. With the appropriate base frame/foundation, bridge slot drying floors are accessible with high wheel loads, allowing easy loading and unloading of bulk materials.

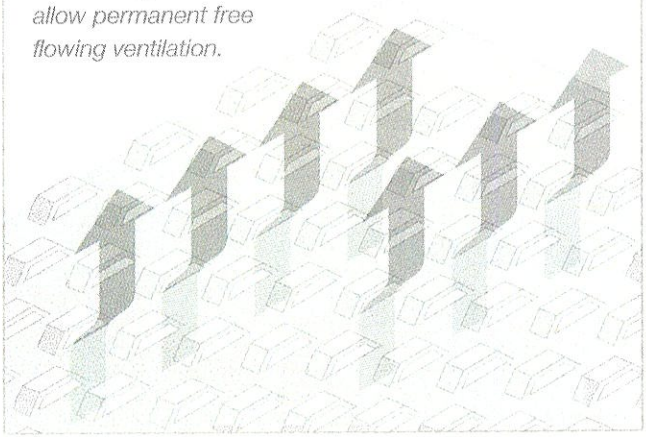
RMIG offers more than standard solutions

With top quality products and skilled staff who are dedicated to fulfilling the needs of our customers, RMIG can offer much more than standard solutions when you choose bridge slot sheets for your applications:

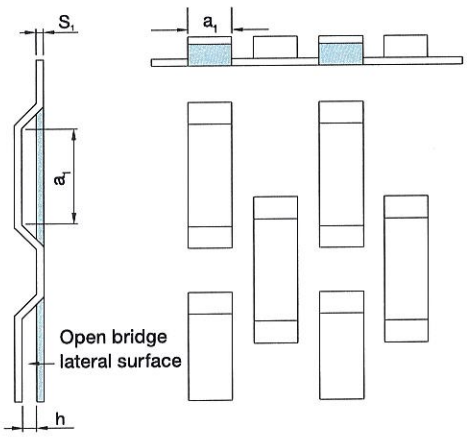
- Production according to your measurements in different thicknesses/gauges
- Drilling of mounting holes and bending
- Additional and replacement delivery of your existing ventilation panels
- Short delivery times
- Technical advice on site and accompanied visits to referred plants
- Access to RMIG's network of partner companies for base frames/foundation and assembly

If you want to secure first choice solutions for ventilation you will always find the right partner for service, ideas and quality in RMIG. We are your experienced partner for industry and agriculture.

With their open area, RMIG bridge slot sheets allow permanent free flowing ventilation.



Bridge slot holes – technical details



Appendix C – Process Flow Diagram

New Hall Farm Paper Drying Plant, Process Flow Diagram, V1.0 May 2024