



U M B R E L L A
ENVIRONMENTAL
PROTECTING YOUR BUSINESS

Environmental Management System and Operating Instructions

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CIWM

Affiliated Organisation 2024

Together, we stand for a world beyond waste

Site Address:

Synergy Asset Services Limited

Merton Farm
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Kent
CT4 7BA



Registered Office

Merton Farm
Merton Lane South
Canterbury
Kent
CT4 7BA

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Terms and Definitions

Not all terms will be used in this document.

Term	Definition
Auditor	Person with the competence to conduct an audit.
Continual improvement	Recurring process of enhancing the environmental management system in order to achieve improvements in overall environmental performance.
Corrective action	Action to eliminate the cause of a detected nonconformity.
Document	Information and its supporting media.
Environment	Surroundings in which site operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation.
Environmental aspect (EA)	Elements of sites activities or products or services that can interact with the environment.
Environmental impact	Any change to the environment, whether adverse or beneficial, wholly or partially resulting from sites environmental aspects.
Environmental management system (EMS)	Part of sites management system used to develop and implement its environmental policy and manage its environmental aspects.
Environmental objective	Overall environmental goal, consistent with the environmental policy.
Environmental performance	Measurable results of sites management of its environmental aspects.
Environmental policy	Overall intentions and directions of sites related to its environmental performance.
Environmental target	Detailed performance requirement applicable to site or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.
Interested party	Person or group concerned with or affected by the environmental performance of site.
Internal audit	Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the environmental management system audit criteria set by site are fulfilled.
Nonconformity	Non-fulfilment of a requirement.

Organisation	Site/Operator
EP	Environmental Permit.
NTS	Non-technical Summary.
ERA	Environmental Risk Assessment.
SCR	Site Condition Report.
EMS_OT	Environmental Management System and Operating Techniques. Compliant with Permit Condition 1.1.1.
FPP	Fire Prevention Plan.
NVMP	Noise and Vibration Management Plan.
OMP	Odour Management Plan.
Appropriate Measures	Appropriate measures are the standards that operators should meet to comply with their environmental permit requirements.
Site	Location of waste activities.
EA	Environment Agency
HSE	Health and Safety Executive
TCM	Technically Competent Manager

1 INTRODUCTION

This Environmental Management System and Operating Techniques (EMS_ OT) accompanies the application for a bespoke waste installation EPR/FB3602HU/V002 at Merton Farm, Merton Lane South, Canterbury, Kent, CT4 7BA. The site location is shown on plan Drawing 1 018.1_09_001 Permit Boundary. The site was historically a farm the units and land in use are surrounded by other light commercial activities and farming uses.

The only waste to be accepted on site is those listed in Table 2 Permitted Wastes. The waste activities carried out on site are listed in Table 1 Permitted Activities and processing capacity for the site is shown below.

Schedule 1 Activity	Tonnage (processing capacity)	
SECTION 5.3 Disposal or recovery of hazardous waste Part A(1) (a) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving one or more of the following activities— (ii) physico-chemical treatment;	100	
SECTION 5.6 Temporary or underground storage of hazardous waste Part A(1) (a) Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in Sections 5.1, 5.2, 5.3 and paragraph (b) of this Section.	Hazardous Throughput Annual	5,000
	Non-Hazardous Throughput Annual	25,000

The site is approximately 6566 m² and is located at Merton Farm, Merton Lane South, Canterbury, Kent, CT4 7BA shown below in Figure 1 Site Location (Aerial Image).

Figure 1 Site Location (Aerial Image)



1.1 Permitted Activities

The Merton Farm site is permitted for the receipt of used gas cylinders from a variety of locations including civic amenity sites and direct collections from users. Hazardous cylinders are stored on site prior to transfer to a suitable permitted facility for treatment and disposal/and or recovery. The site also accepts non-hazardous pressure vessels which are stored on site prior to transfer suitable permitted facility for treatment and disposal/and or recovery.

In addition, Synergy accept and treat, prior to onwards transfer for recovery, up to 300,000 fire extinguishers per annum as well as other non-hazardous inert cylinders. Treatment will be limited to the discharge of contents and dismantling by removal of valves and other parts to allow recycling of metals, plastics and rubber at other sites.

The activities on the site fall under the following R/D codes

Table 1 Permitted Activities

Schedule 1- Environmental Permitting Regulations		Limits of specified activity and waste types
<p>Section 5.3 (a) (ii) - haz waste installation – physico-chemical treatment</p>	<p>R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced)</p> <p>R5: Recycling/reclamation of other inorganic materials</p> <p>D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where the waste is produced)</p> <p>D9: Physico-chemical treatment not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12</p>	<p>Physical treatment including manual sorting and separation of hazardous and non-hazardous waste for disposal (no more than 90 tonnes per day) or recovery.</p> <p>The maximum quantity of hazardous waste that can be stored at the site shall not exceed 100 tonnes at any one time.</p> <p>Subject to any other requirements of this permit wastes shall be stored for no longer than 3 months.</p> <p>Treatment of fire extinguishers is limited to the bleeding of the contents of and dismantling by removal of valves and other parts from cylinders to allow recycling of the metals, plastic and rubber.</p> <p>Treatment of non-hazardous cylinders is limited to the bleeding of the contents of and dismantling by removal of valves and other parts from cylinders to allow recycling of the metals, plastic and rubber.</p> <p>Manual dismantling to include the use of hand powered hand tools such as angle grinder and plasma cutter to reduce fraction size of waste.</p> <p>Subject to any other requirements of this permit wastes shall be stored for no longer than 3 months.</p>
<p>Section 5.6 - temporary storage of hazardous waste.</p>	<p>R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced)</p>	<p>Temporary Storage of hazardous waste</p>
Waste Operation		

<p>- non -hazardous waste installation – physico - chemical treatment</p>	<p>R4: Recycling/reclamation of metals and metal compounds</p> <p>R5: Recycling/reclamation of other inorganic materials</p> <p>R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced)</p> <p>D9: Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D12</p>	<p>Physical treatment including manual sorting and separation of hazardous and non-hazardous waste for disposal (no more than 90 tonnes per day) or recovery.</p> <p>Subject to any other requirements of this permit wastes shall be stored for no longer than 3 months.</p> <p>Treatment of fire extinguishers is limited to the bleeding of the contents of and dismantling by removal of valves and other parts from cylinders to allow recycling of the metals, plastic and rubber.</p> <p>Treatment of non-hazardous cylinders is limited to the bleeding of the contents of and dismantling by removal of valves and other parts from cylinders to allow recycling of the metals, plastic and rubber.</p> <p>Manual dismantling to include the use of hand powered hand tools such as angle grinder and plasma cutter to reduce fraction size of waste.</p> <p>Subject to any other requirements of this permit wastes shall be stored for no longer than 3 months.</p>
<p>Storage and handling of waste</p>	<p>R13: Storage of waste pending the operations numbered R5 (excluding temporary storage, pending collection, on the site where it is produced).</p>	<p>From receipt of waste to dispatch off-site for recovery or processing.</p>
<p>Directly Associated Activity</p>		
<p>Fuel Storage/chemical Storage</p>	<p>Diesel Hydraulic Oils / Lubricating Oils Lubricating Oils</p>	<p>2500 litres 2 drums up to 205 litre per drum. 2 drums up to 205 litre per drum.</p>

1.2 Hours of Operation

Monday to Friday 07:00 to 18:00

Saturday 07:00 to 12:00

Sunday and Bank holidays closed.

1.3 Waste Types

Table 2 Permitted Wastes

Waste code	Description
15 Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified	
15 01	packaging (including separately collected municipal packaging waste)
15 01 04	metallic packaging (canisters only)
15 01 10*	packaging containing residues of or contaminated by hazardous substances (canisters only)
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 01	end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)
16 01 03	end-of-life tyres
16 Wastes not otherwise specified in the list	
16 05	gases in pressure containers and discarded chemicals
16 05 04*	gases in pressure containers (including halons) containing hazardous substances.
16 05 05	gases in pressure containers other than those mentioned in 16 05 04.
16 06	batteries and accumulators
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	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	separately collected fractions (except 15 01)
20 01 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

1.4 Waste Quantities

EWC	Material	Tonnes p.a.
15 01 04	metallic packaging (canisters only)	Up to 25,000
15 01 10*	packaging containing residues of or contaminated by hazardous substances (canisters only)	Up to 5,000
16 01 03	end-of-life tyres	200
16 05 04*	gases in pressure containers (including halons) containing hazardous substances.	Up to 5,000

16 05 05	gases in pressure containers other than those mentioned in 16 05 04.	Up to 25,000
16 06 01*	lead batteries	Up to 5,000
16-06-02*	Ni-Cd batteries	Up to 5,000
16-06-03*	mercury-containing batteries	Up to 5,000
16 06 04	alkaline batteries (except 16 06 03)	Up to 25,000
16 06 05	other batteries and accumulators	Up to 25,000
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	Up to 5,000
20 01 34	batteries and accumulators other than those mentioned in 20 01 33	Up to 25,000

1.5 Environmental Policy

Synergy Asset Services Ltd (the 'Organisation') recognises the importance of environmental protection and is committed to operating its business responsibly and in compliance with all legal requirements relating to the collection and recycling of pressurised vessels.

It is the Organisation's declared policy to operate with and to maintain good relations with all regulatory bodies. It is the Organisation's objective to carry out all measures reasonably practicable to meet, exceed or develop all necessary or desirable requirements and to continually improve environmental performance through the implementation of the following:

- a) Assess and regularly re-assess the environmental effects of the Organisation's activities
- b) Training of employees in environmental issues
- c) Minimise the production of landfill waste
- d) Minimise material wastage
- e) Minimise energy wastage
- f) Promote the use of recyclable and renewable materials
- g) Reduce and/or limit the production of pollutants to water, land and air
- h) Control noise emissions from operations
- i) Minimise the risk to the general public and employees from operations and activities undertaken by the Organisation

- j) To reuse and recycle materials whenever it makes commercial sense to do so
- k) Not to dispose of materials to landfill whenever less environmentally damaging methods of disposal are available at equal or lower cost
- l) The promotion of paperless trading and communication with customers, suppliers and employees
- m) To include environmental implications in all procurement practice, including consideration of suppliers/sub-contractors' Environmental Policies.
- n) To be at the forefront of best practice as a waste carrier. Detailed Commitments:
 - a) To implement and maintain the ISO 14001 certified Environmental Management System throughout the Organisation.
 - b) Maintain up to date environmental legislation and associated regulations and ensure compliance through the monitoring of record keeping, disposal methods, Health & Safety and customer service
 - c) Challenge our performance through benchmarking, targeting and auditing our activities and making these results available to our customers and any other interested parties.

This Policy is communicated to all employees, suppliers and sub-contractors and is made available to the public. This Policy, associated commitments and working practices are subject to at least an annual review to monitor the continued effectiveness of the Environmental Management System.

1.5.1 Environmental Management Representative (EMR)

The Contracts & Compliance Manager (Sam Roud) is the appointed EMR and has the responsibility and authority for:

- a) ensuring that EMS requirements are established, implemented and maintained in accordance with the ISO 14001 standard;
- b) ensuring that sufficient resources are allocated for the proper implementation of the environmental policy and the EMS;
- c) regularly reviewing the policy and the effectiveness of the EMS, and ensuring that the necessary changes are made.

EMR is also the Chairman of the EMS Committee and has the responsibility and authority for:

- a) leading the EMS_OT Committee to establish and implement the EMS according to ISO 14001 standard, and monitoring the performance of the EMS;
- b) coordinating internal EMS_OT audits to ensure the EMS_OT has been properly implemented and maintained;
- c) handling and investigating nonconformity and ensuring corrective and preventive action has been taken to mitigate any impacts caused;

- d) reporting on the performance of the EMS_OT to the top management for review and as a basis for improvement of the EMS_OT.

The EMR, the EMS_OT Committee and Managing Director shall undertake the EMS_OT management review quarterly to ensure top management commitment and integration of the EMS_OT with business strategies for its implementation and continual improvement.

1.5.2 Environmental Management System Committee (EMS Committee)

This committee is responsible for:

- a) the establishment and implementation of the EMS_OT;
- b) the establishment and review of objectives, targets, and programmes;
- c) ensuring the effective implementation of environmentally-related operational controls and programs;
- d) the internal communication of environmental matters between management and employees; and promoting environmental awareness among company staff;
- e) the review of complaint records, nonconformity, corrective action and preventive action reports and the adoption of preventive actions as necessary;
- f) providing leadership in the pursuit of environmental issues;
- g) any other EMS activities that are assigned by the EMR;
- h) holding regular meeting (at approximately quarterly intervals).

1.5.3 Management Review Committee

The Committee systematically examines the EMS_OT to ensure the suitability, adequacy and effectiveness of the EMS. The Committee comprises of the Managing Director, EMR and Departmental Managers.

1.5.4 Departmental Managers

The Function / Departmental Managers are responsible for:

- a) establishing controls for the identified significant environmental aspects for their function team / department according to procedures and instructions;
- b) ensuring that the EMS_OT is properly implemented and that environmental matters are properly handled at all stages;

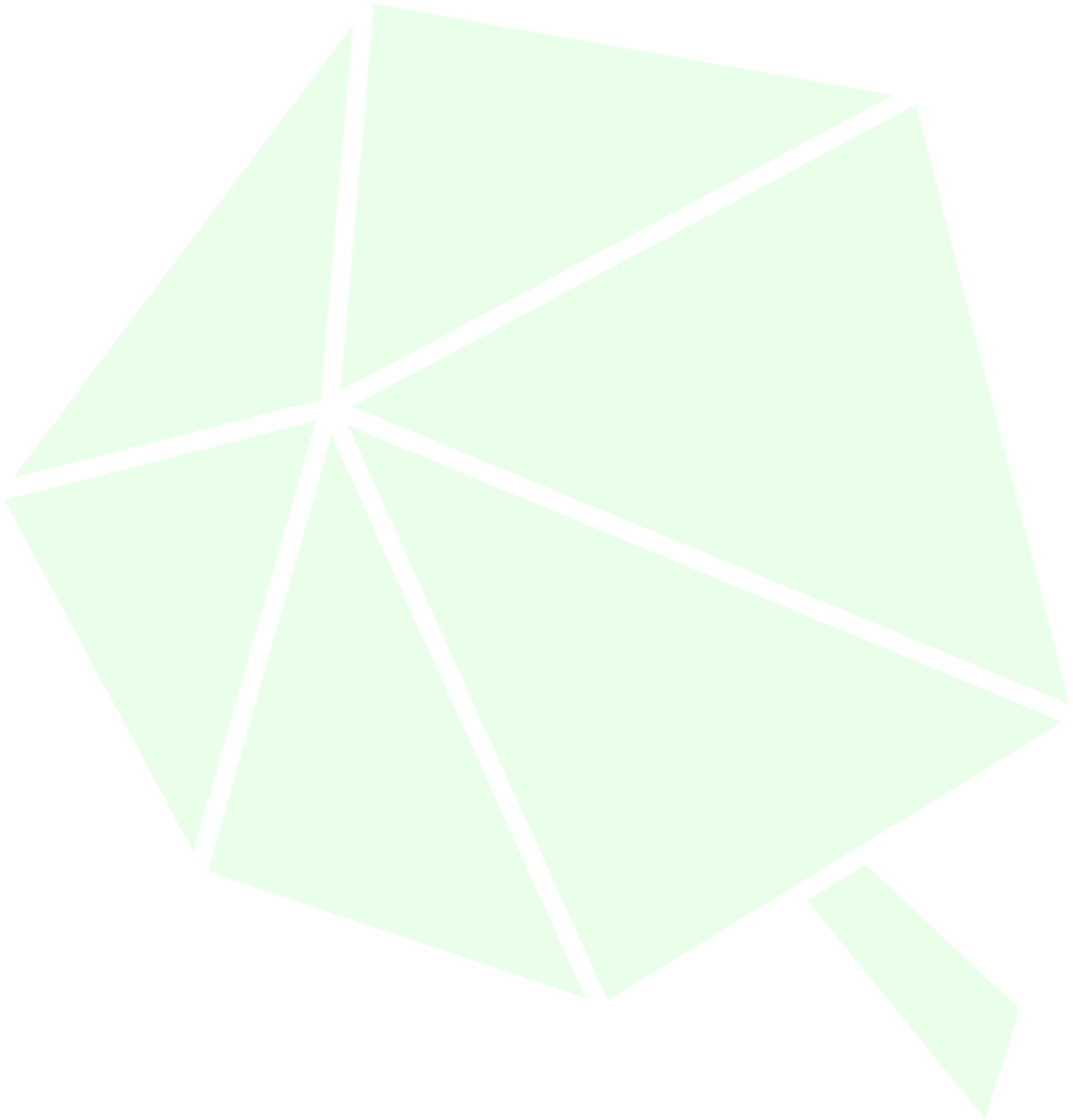
1.5.5 All Employees

All employees are responsible for:

- a) working in accordance with the documented environmental procedures and instructions, specific responsibilities defined in individual procedures and instructions in accordance with relevant risk assessments and method statements, and
- b) reporting problems or deviations associated

1.6 Annual Waste Tonnages

Annual throughput combined up to 30,000 tonnes p.a.



1.7 Total Storage Quantities

			Size of storage area			Each Area stores waste in 1 m ³ Containers	
Waste stream (EWC Code)	Location	How it is stored For example this may include piles, bays, containers, skips, racks, bales	Max. length / m	Max. width / m	Max. height / m	Volume / m ³	Max. time it will be stored
Non-Waste	Drums	Stacked loose or stored in IBC Cages	10	5	3.6	N/A	Indefinitely
	IBCs	Stacked 3 IBCs high	10	30	3.6	N/A	Indefinitely
	Pallets	Stacked 5 m high	10	5	5	N/A	Indefinitely
	LPG Inbox	Stacked 2 stillages high	15	5	2.5	N/A	6 months
	Flogas Load	Stacked 2 stillages high	15	5	2.5	N/A	6 months
	Flogas	Stored in stillages on ground level (1 high)	15	15	2	N/A	6 months
	Calor	Stored in stillages on ground level (1 high)	15	5	2	N/A	6 months
	UK Mixed	Stacked 2 stillages high	15	5	2.5	N/A	12 months
	Euro Mixed	Stacked 2 stillages high	15	5	2.5	N/A	12 months
	Other LPG	Stacked 2 stillages high	15	5	2.5	N/A	12 months
19-12-02	Ferrous Metals	Stored in IBCs stacked max 3 high	15	10	3.6	240 IBCs	3 months

			Size of storage area			Each Area stores waste in 1 m ³ Containers	
Waste stream (EWC Code)	Location	How it is stored For example this may include piles, bays, containers, skips, racks, bales	Max. length / m	Max. width / m	Max. height / m	Volume / m ³	Max. time it will be stored
15-01-04, 16-05-05	Processing Stock	Stored in IBCs stacked max 3 high	15	10	3.6	240 IBCs	3 Months
16-05-05	Fire Extinguisher (Powder)	Stored in IBCs stacked max 3 high	8	8	3.6	240 IBCs	3 months
16-05-05	Fire Extinguisher (Wets)	Stored in IBCs stacked max 3 high	8	4	3.6	120 IBCs	3 months
16-05-05	Fire Extinguisher (CO2)	Stored in IBCs stacked max 3 high	8	4	3.6	80 IBCs	3 months
19-12-02	Powder	Stored in tonne bags (FIBCs) in a 20ft ISO	8	2	3.6	20 FIBCs	3 months
19-12-12/19-12-04	Plastic/Rubber	Stored in tonne bags (FIBCs) in a 20ft ISO	8	2	3.6	40 FIBCs	3 months
16-05-04*	Haz Specialist, MAPP, Canisters, Aerosols, Refrigerants, Autotanks, Halon, Adhesives	Stored in IBCs max 3 high in designated bays within the hazardous area on impermeable site surface.	8	10	3.6	180 IBCs	3 months
16-05-04*	Nitrous Oxide	Stored in IBCs in designated bays within the hazardous area on impermeable site surface.	8	15	3.6	180 IBCs	3 months

			Size of storage area			Each Area stores waste in 1 m ³ Containers	
Waste stream (EWC Code)	Location	How it is stored For example this may include piles, bays, containers, skips, racks, bales	Max. length / m	Max. width / m	Max. height / m	Volume / m ³	Max. time it will be stored
16-05-05, 16-05-04*, 15-01-04	Sorting Bay	Unsorted mixed loads brought into area in IBCs and each commodity sorted into dedicated IBCs around the perimeter of the area and then moved into storage bays when filled.	10	15	3.6	N/A	3 months
16-05-05, 16-05-04*	Hazardous ISO	Lecture cylinders and high pressures, itemised and stored within plastic sealed drums in vermiculite and stored on racking	6	2.4	2.6	10 m ³	3 months
16-05-05, 16-05-04*	High Pressure Inbox	Stored within high pressure stillages on ground level (1 high)	12	2	2	40 Stillages	6 months
16-05-05, 16-05-04*	High Pressures	Stored within high pressure stillages on ground level (1 high)	12	25	2	120 Stillages	6 months
16-05-04*	Acetylene	Stored within high pressure stillages on ground level (1 high). Area cordoned off by herass fencing	12	10	2	30 Stillages	6 months

			Size of storage area			Each Area stores waste in 1 m ³ Containers	
Waste stream (EWC Code)	Location	How it is stored For example this may include piles, bays, containers, skips, racks, bales	Max. length / m	Max. width / m	Max. height / m	Volume / m ³	Max. time it will be stored
16 06 01* 16-06-02* 16-06-03* 16 06 04 16 06 05	Batteries	Separate by type in their own battery boxes. Stored in an ISO (Shipping Container).	6	2.4	2.6	10 m ³ (10 Battery Boxes)	3 months
16-01-03	Tyres	Currently non operational activity proposal for Tyres would be laced within an open bay between two ISO containers on the ground, FPP would be re submit for assessment if activities were to be carried out..	8	8	2	N/A	3 months

2 SCOPE OF ENVIRONMENTAL MANAGEMENT SYSTEM

This EMS_OT covers the on site activities of Synergy Asset Services Limited activities and contains:

- The Environmental Policy;
- Statements of responsibility and authority;
- An overview of the company's environmental procedures and controls;
- The identification of the resources and training allocated to management, performance of work and verification activities including internal audit;
- The appointment of the Environmental Management Representative (EMR); and
- The arrangement for periodic management reviews.

The purpose of this Manual is to demonstrate that this EMS meets all *ISO 14001:2004* requirements and provide guidance and direction for the implementation and operation of the EMS to all personnel including all relevant documents.

2.1 Notice Board

The notice board as a minimum will include:

- the permit holder's name
- an emergency contact name and telephone number
- a statement that the site is permitted by the EA
- the permit number
- Environment Agency telephone number 03708 506506 and the incident hotline 0800 807060

2.2 Site Surfaces

Site is made up of hard standing and impermeable site surfaces, see Drawing 2 018.1_09_004 Site Plan.

2.3 Drainage

Drainage segregates uncontaminated rain water see Drawing 4 018.1_09_009 Drainage Plan.

2.4 Construction and Supervision

Any construction work, infrastructure improvement and replacement will be undertaken by a specialised contractor if the skills are not retained by the operator and where required will be inspected by a suitably qualified Civil Engineer to ensure that the necessary standards and specifications are met.

2.5 Inspection and Maintenance

Daily inspections will be undertaken by the TCM or a person that has been appointed by the TCM or senior management in accordance with **Error! Reference source not found.**

3 SITE INFRASTRUCTURE

3.1 Access

Access to the site Merton Lane off of the B2068 (Nackington Road). The site itself lies to the south of Canterbury. It is located in an farm industrial area. The farm itself is active. There are other light commercial activities in neighbouring industrial units. Wider of this the site is surrounded by agricultural land used for arable crops. The site is accessed via a locked gate on the north western boundary.

The sites location is shown on **Error! Reference source not found.** and the extent of the permit boundary on REF_Ref151388717 \h * MERGEFORMAT **Error! Reference source not found.**

3.2 Security

Site is surrounded by a security fence which runs along the perimeter. There is also strategically located CCTV cameras and an alarm system that runs the perimeter.

Given that the site will not operate 24 hours a day, Synergy have considered the risks to arson and vandalism outside operating hours. In order to minimise these risks, a proximity alarm system is installed to cover the perimeter of the site as shown on the Site Layout. The system is designed to detect irregular movements along the site perimeter where trespassers may gain access. In the event that the alarms detect a security breach, the system will send a notification to designated members of staff as well as the security provider.

Following notification, the designated members of staff can remotely access the CCTV cameras and will assess the situation on site. If a threat is detected, the emergency services will be informed, and an audible alarm will be activated on site to deter any trespassers from any further action.

3.3 Site Information

Emergency contact numbers, hours of operation, permit number and the EA's incident number and general enquiries number will be displayed in the operational area as per 2.1 Notice Board.

3.4 Office and Welfare

There is an office on site with power, internet and potable water and toilets.

3.5 Quantity Measurements

There is no weigh bridge on site the quantity of the waste is provided by the customer.

3.6 Fuel Storage

Fuel storage is shown on Drawing 2 018.1_09_004 Site Plan.

4 STAFFING AND EQUIPMENT

Main operational instruction for the onsite operations and management is given in the sites EMS as well as other management plans such as an FPP and specific written procedures issued separately but are referenced within this EMS_OT.

Updates in training will be as required or when the permit or site EMS_OT requires a change or update. This may also occur if there is a large scale change to on site operations and or infrastructure.

4.1 Staffing

When the site is open it will be staffed by a minimum of 2 members of staff who are aware of the following.

- Waste acceptance and control procedures
- Operational controls and environmental monitoring
- Maintenance
- Record keeping
- Emergency action plans
- Notifications to the EA

The operator also lives on site in the adjacent Park View Farmhouse providing permanent staffing and monitoring.

4.1.1 Management

Operations will be overseen and monitored by a TCM qualified via schemes approved under the Environmental Permitting (England and Wales) Regulations 2016 (as amended)

Details of the TCM will be provided to the EA. At times where the specified TCM(s) is/are unavailable, an alternative TCM will be allocated responsibility for the operations, the EA will be made aware of these changes.

Responsibilities of the TCM are to ensure permit compliance, ensure compliance with the Health and Safety policy, and the liaison with the EA and other regulatory bodies.

4.1.2 Operational

A minimum of two persons will be on site during operational hours. Site staff will be responsible for vehicles coming in to and leaving site, inspecting waste to ensure it is compliant with the permit, list of waste in Table 2 Permitted Wastes, Duty of Care paper work, controlling vehicle movements, using site equipment and machinery, loading and unloading vehicles, ensuring good general housekeeping for the site and reporting any issues to the TCM. Extra staff will be brought to site if required.

5 WASTE MOVEMENTS

5.1 Health and Safety

All visitors to the site will report to the site office. First time visitors to the site will be required to complete a visitor form and read the displayed notice board giving instructions on health and safety and site procedures. They will also be informed of any works ongoing on site that may impact them.

As a minimum during the unloading, weighing and categorisation and acceptance of waste at the site, all operators and drivers must wear PPE as detailed below:

- Gloves and wrist protection sleeves specified within EN388:2016 to at least the following specification:
 - Abrasion resistance 4
 - Blade cut resistance 5
 - Tear resistance 4
 - Puncture resistance 3
 - Safety boots including steel midsole.
 - Safety glasses to EN166.

5.2 Duty of Care

We have a legal obligation under the 'Duty of Care' to know what wastes are being deposited at site, that they are controlled correctly, and that there is sufficient written information accompanying the waste.

Main Objectives:

- To ensure compliance with legal requirements
- To ensure the identification on non-compliant waste
- To ensure correct completion of paperwork and therefore customer invoicing
- To ensure the identification of reuse items, and compliance with the Waste Hierarchy

The consignment note must be inspected. Ensure all Parts (A-D) have been completed, and that the driver and waste producer have signed and dated Part C and D respectively.

Ensure that the date of consignment is the same date as the date upon which the load is received, or within one working day.

Check the written description of the waste, provided on the Consignment Note Recyclables Annex. Confirm with the driver that this is a true representation of the waste collected and undertaken an initial visual inspection of the waste within the vehicle.

Ensure that the correct box is completed to indicate whether hazardous or non-hazardous wastes are being received.

Transfer notes should also be completed for no hazardous waste movements ensuring that all boxes and sections are completed.

5.3 Carriers Registrations

Only registered waste carriers will be contracted to deliver or remove waste from site, or Synergy Asset Services Limited Management own fleet. The TCM or an trained and appointed member of staff will ensure that hauliers are moving waste from the site are registered waste carriers using standard checks such as the EA public register. Where there is uncertainty the carrier will be asked to provide a validated waste carriers certificate.

5.4 Description of Waste

All loads will be described appropriately and will only be accepted where in compliance with acceptable waste types for the site refer to Table 2 Permitted Wastes. the TCM will ensure that delivered waste is acceptable and permitted by the environmental permit.

5.5 Input Controls

Site only accepts pre booked waste delivered by their own fleet in accordance with Table 2 Permitted Wastes.

5.6 Outgoing Vehicles

Outgoing vehicles are containerised but will be covered or sheeted as required

6 OPERATIONS

6.1 List of Site Activities

6.1.1 Vehicle Loading/Unloading

All yard and driving staff have been sufficiently training in proper handling methods in line with HSE guidelines relating to manual handling and working at height. This activity incorporates the use of plant and machinery where possible to aid in ease of handling. This involves using a pump truck to move the IBCs around within the vehicle to create safe stowage and the use of a forklift or telehandler to load/unload the tail lift thereby minimising manual handling needs.

Manual handling is required however to move loose cylinders to and from the tail lift area.

All yard staff are trained in cylinder identification and are familiar with EWC codes and waste segregation requirements. At the point of unloading the mixed goods from the collection vehicle through the. Above highlighted steps, the yard manager is then responsible for segregating the waste from the owned good primarily to avoid contamination and improper storage. Secondly the Yard Manager will segregate the different cylinder types into assorted labelled IBCs within the sorting area. Once full of a single waste stream, these IBCs are then checked for compliant labelling and contents before being forklifted to its assigned storage bay as highlighted within the site plan. Once identified and stored, cylinders should not be stored on site for more than 3 months as stipulated within Synergy's permit.

6.1.2 Powder Extraction

Powder extinguishers require compliant extraction using a bespoke extractor that works on a sealed system. The powder is removed from these extinguishers via the extinguishers nozzle if the trigger mechanism is still functional, and through piercing a small hole within the body of the extinguisher to expose the remainder of any powder residues, the vacuum is capable of removing said particles. Only once the extinguisher is empty can any decommissioning take place.

6.1.3 Water/Foam Extraction

Water and Foam extinguishers are processed in a different manner due to the liquid nature of their contents. The extinguisher is rested within a cylinder brace to allow for safe discharge into a sealed IBC via a bespoke system. The sealed IBC is situated on a 2000 litre bund to allow for any leakages to be contained without the liquids coming into contact with the site surface and percolating lower.

6.1.4 Cylinder Venting

To ensure that non-hazardous cylinders are safe to be decommissioned without a risk of sudden pressure release or rupture, non-hazardous inert gaseous contents are slowly and safely vented to atmosphere within a safe cylinder

brace. The brace also allows for minimal contact between the operator and the cylinder as the discharge of pressurised gases can create vapour freeze.

6.1.5 Cylinder Decommissioning

In line with Synergy's permit, non-hazardous cylinders and extinguishers are compliantly decommissioned using manual tools and static plant into component parts such as plastic, rubber, ferrous and non-ferrous metal for onward recycling at bespoke facilities. All solid bi-product materials are stored in heavy duty tonne bags in separate containers ready for off-take.

6.1.6 Scrap Loading

Ferrous scrap metal arising from decommissioned cylinders and extinguishers is accumulated within IBCs and stored within a non-hazardous waste bay before being loaded in bulk into a walking floor trailer using a scrap elevator and telehandler.

6.1.7 General Site Maintenance

General site compliance is maintained by following all synergy compliance and training literature. Maintenance is observed and checked through daily walkaround checks carried out by the Yard Manager, before the arrival of the main body of staff to ensure that the site is assessed without hazards or changing conditions present. The site is checked for general cleanliness and tidiness in relation to litter, pest control, vehicle parking and waste storage compliance. Other aspects assessed include weather conditions, dust levels, odour levels, standing water levels, explosive atmosphere build ups and other H&S and environmental standards that must be adhered to as stipulated with Synergy's permit conditions. Findings are reported to the Compliance Manager and logged within the site diary for record keeping.

6.1.8 Stock Checks, Management and TCM Cover

Stock checks are carried out weekly at the end of the working week by the Compliance Manager & TCM. This forms part of Synergy's permit conditions whereby the TCM must be present on site for at least 20% of the working weekly hours (8 hours). The TCM is on site 2-3 days a week without exception (Usually Mondays and Fridays) to maintain a regular maintenance schedule. Stock Checks are carried out by assessing IBC quantities of each commodity on site (own cylinders, non-hazardous waste and hazardous waste). Waste storage periods are monitored by taking timestamped photographs of each full IBC to be able to track its lifespan on site. These IBC quantities and periods are then confirmed with the Yard Manager to highlight any anomalies or explain any irregular findings before being logged on the stock board as displayed within the office to encourage stock flow so that storage periods and tonnages aren't exceeded. These findings are then digitally entered into the site's ongoing stock level spreadsheet and chart which charts stock movement frequencies and trends which are regularly reviewed to highlight any required operational procedure changes in the event that stock levels near permit allowances. In the event that this situation arises, a senior management meeting is held and waste off-take

frequencies/acceptance thresholds are adjusted. In events where periods/tonnages are very close to being reached, senior staff have a system in place whereby all site operations may be ordered to stop so that full prioritisation can be assigned towards removing expired/overweight waste from the site compliantly even at higher gate fees and disposal rates if required.

To supplement TCM cover, Synergy Recycling hold an external TCM on retainer to visit the site on short notice in the event that the normal TCM is unable to fulfil the 20% requirement.

6.2 Permit Breach Procedures

In the event that a permit breach is recorded (either internally or externally), procedures have been put in place by Synergy to record and rectify the breach whilst making long term improvements to deter and prevent future breaches. If a breach occurs, senior management staff, will conduct an immediate meeting whereby minutes will be taken and an investigation will take place to ascertain the origin of the breach, parties responsible, and corrective actions. The meeting will detail the steps that will be taken which are as follows:

- Suspend all site activity temporarily to allow for a full site walkaround accompanied by the Yard Manager, to highlight the breach including the waste stream in question, the tonnages of said waste, the storage methods employed for said waste and any other extenuating circumstances that may have contributed to a permit breach.
- Once the nature of the breach has been noted, it will be documented by the Compliance Manager, within the site diary and in the non-conformance records.
- Senior Management will then discuss corrective actions including site shutdown length which will then be relayed to the Yard Manager to inform staff. Corrective Actions will most likely come in the form of quarantining the waste in question within the designated quarantine area on a double bund in the event that a breach has arisen as a result of improper storage methods.
- Once the waste has been quarantined, documented, assessed and discussed, steps will be taken to remove the waste, whether it be non-compliant or over tonnage allowances. As above the waste in question will be booked for delivery to a compliant third party off takers as a priority above any other operational matters. This export of waste from the site will be made as soon as possible and at a higher disposal rate/gate fee if necessary.
- Once the breach has been rectified, the Managing Director will implement preventative steps, most likely in the form of staff retraining, risk assessment revisions and amendments to the operating techniques and acceptance procedures.
- Only once these steps have been adhered to can regular operations continue.
- If the permit breach is likely to re-occur, the highlighted waste will cease to be collected whilst permit revisions are requested with the EA to increase tonnage allowances or waste accepted.
- A senior staff follow up meeting will re-occur 1 month later to reassess operating levels and the effectiveness of preventative steps made.

In the event of a permit breach or emergency the following contact details are displayed on the site entrance board and should be used:

Site office: 01227 462008

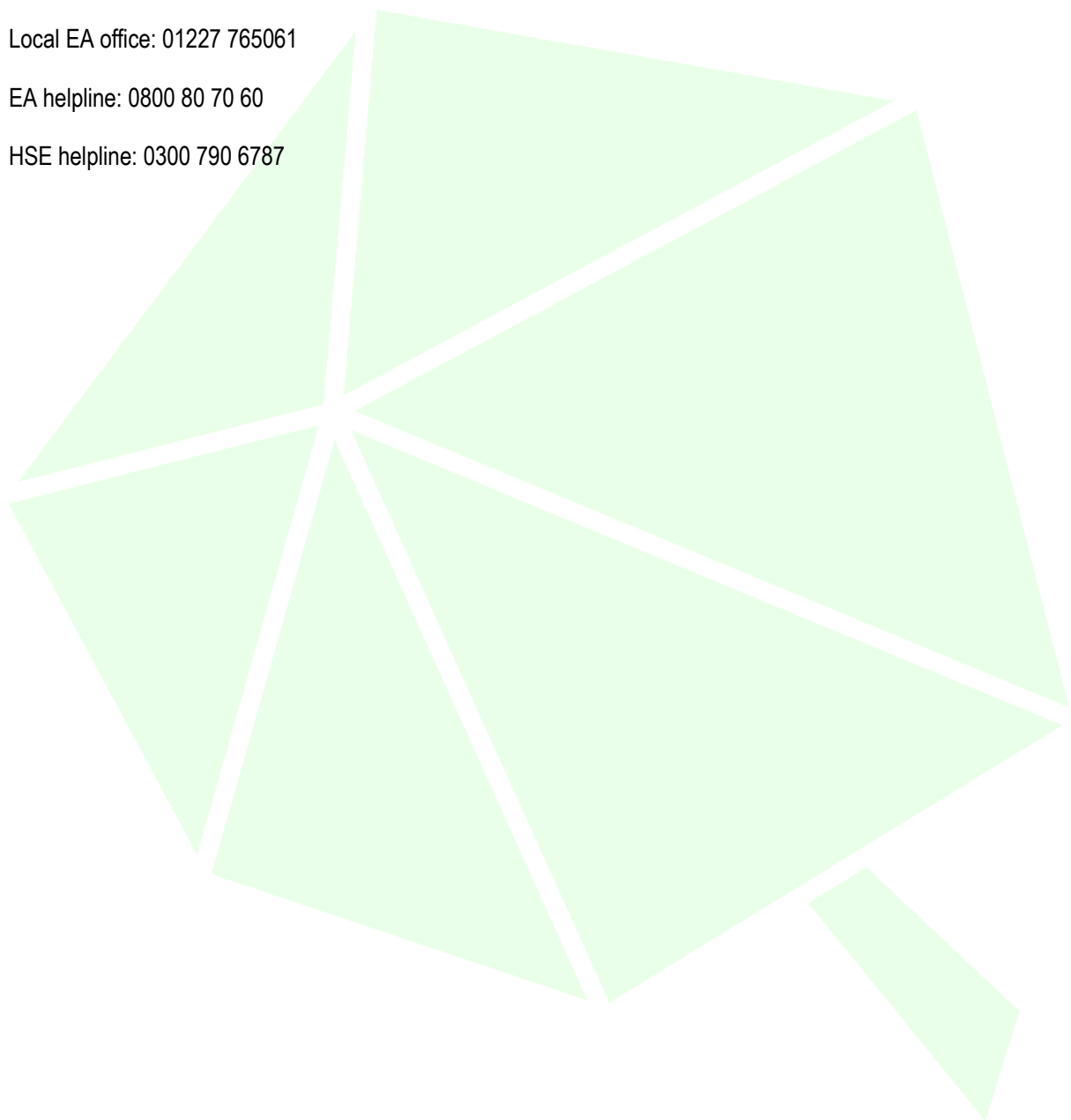
Simon Roud: 07802 726817

Sam Roud: 07596 953253

Local EA office: 01227 765061

EA helpline: 0800 80 70 60

HSE helpline: 0300 790 6787



7 WASTE ACCEPTANCE

7.1 Waste Acceptance Procedures

7.1.1 Pre-acceptance procedures

Prior to delivery to the site, the waste producer or holders are required to provide the following information of the waste to allow Synergy to assess its suitability for acceptance:

- The quantity of waste to be imported.
- The contents of the canisters, including named product and propellant.
- Whether the canisters are fully discharged or partially discharged.
- Hazardous properties posed by contents of canisters; and
- Construction material of canisters (e.g., steel, aluminium or mixed).

Synergy do not accept wastes onto the site unless the above information is established.

If the information provided demonstrates that the waste is acceptable, arrangements are made to deliver the waste to the site. Prior to delivery, any gas that present within any of the waste gas cylinders are discharged by the waste producer or holder. Furthermore, Synergy inform the waste producer or holder to place different waste streams into different containers to prevent cross contamination between incompatible materials.

All records relating to the pre-acceptance are kept for cross-reference a verification at the waste acceptance stage. These records are kept for a minimum of 3 years.

7.1.2 Acceptance Procedures

All vehicles delivering waste are licensed waste carriers and each delivery must be accompanied by the Waste Transfer Note (for non-hazardous waste) or a Hazardous Waste Consignment Note (for hazardous waste) consistent with fulfilling the company's responsibilities under the Duty of Care Regulations. Before the waste vehicle arrives on site, checks are made to ensure that the waste carrier is properly licensed. This information can be checked by the following methods:

- By phoning the Environment Agency on 03708 506 506 and requesting an instant Waste Carrier Validation Check; or
- Checking online on the Environment Agency's waste carrier register on their website.

To ensure that the transport of the canisters does not pose any potential risks, all waste carriers must also demonstrate that they meet the requirements of the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations (CDG) and the European Agreement Concerning the International Carriage of Dangerous Goods by Road (ADR). The waste carrier also needs to demonstrate that they have received appropriate ADR training.

By undertaking ADR training, the driver is knowledgeable on the type of cylinders that need to be segregated in transit. Furthermore, any driver that undertakes a waste collection on behalf of Synergy receives a detailed inventory of the waste pressure vessels that are scheduled to be collected. This information is used by the driver to arrange how the canisters are loaded on to the vehicle and therefore minimise the risk of reactions to occur between incompatible substances.

Upon arrival on site, all drivers of waste delivery vehicles are to report to the site office and provide documentation of the waste that's being delivered to the site to ensure it corresponds with the information provided during the pre-acceptance stage and therefore complies with the conditions of the environmental permit.

If the document checks show that the waste is acceptable, the driver is to report back to the waste delivery vehicle and be directed to the waste reception area as shown on Drawing 2 018.1_09_004 Site Plan. As noted on the Site Plan, the waste reception area is situated outside and therefore provides sufficient ventilation whilst the canisters are being loaded/unloaded from the waste delivery vehicle.

At the waste reception area, the cylinders are unloaded from the waste delivery vehicle and are subject to the following visual checks:

- Check the waste to ensure that it is as expected, complies with the site's waste acceptance criteria and is consistent with accompanying paperwork and the site's environmental permit;
- Check the condition of the containers in which the canisters have been packaged, in order to identify any that are damaged or unsuitable for handling and storage.
- Inspect the load to identify leaking canisters and potentially explosive accumulations of gas; and
- Check the labelling of the containers in which the canisters have been packaged to ensure that it accurately identifies and describes the waste, removing any labels that do not relate to the waste.

If the visual checks show that the waste canisters correspond with the information provided by the waste delivery driver, and the waste producer/holder during the pre-acceptance stage, the site operatives are to proceed to label each container that holds the waste cylinders with a contents label with a corresponding EWC and hazardous diamond which will be logged in the Synergy collection log on site. Information that was provided during the pre-acceptance stage may also be referenced to facilitate this process.

Once labelled, the waste pressure vessels are transferred to the relevant waste storage area as shown on Drawing 2 018.1_09_004 Site Plan. All waste cylinders are handled using forklift trucks and are only to be undertaken by site operatives who are trained and licensed to do so.

Synergy informs the waste producer or holder to place different waste streams into different containers to prevent cross contamination between incompatible materials. In the event that a mixed load is delivered to the site, reference is to be made to the British Compressed Gas Association's (BCGA) Technical Information Sheet (TIS) titled 'Technical Information Sheet 6: Cylinder Identification (Appendix 10 Technical Information Sheet 6: Cylinder Identification). Colour Coding and Labelling Requirements'. This document notes that all gas cylinders are required

to be labelled to indicate the contents of the cylinder and comply with the requirements of the Classification, Labelling and Packaging Regulations and The Carriage of Dangerous Good and use of Transportable

Pressure Equipment Regulations. As such, in the event that the cylinders are delivered as a mixed load, site operatives should try to identify any labelling on the canisters in order to confirm the nature of the waste. If, however, the labelling has

been removed, the TIS notes that gas cylinders are generally colour coded at the shoulder or the top of the canister to specify its properties. As such, site operatives can refer to any colour coding that is established on the cylinders as a guide to identify the relevant storage area.

Wastes that are not deemed acceptable are rejected. Furthermore, in the event that a mixed load is delivered the site and there is uncertainty in identifying the nature of the waste, it is to be treated as an unauthorised waste and will be rejected.

8 WASTE REJECTION

8.1 Unauthorised and Rejected Wastes

Item	Weight (kg)	Waste Code	R/D Code	Gas	UN Number	Proper Packing Name	Packing Group	Turner Reg.	Special Provisions	Documentation Needed
Regulated Gas Pressure Vessels (Non-Waste)										
Free of Charge LPG	12	N/A	N/A	Butane/Propane	UN1811/UN1878	BUTANE/PROPANE	2.1	B/D	C19, C10, C136	Collection Note Only
LPG UK	12	N/A	N/A	Butane/Propane	UN1811/UN1878	BUTANE/PROPANE	2.1	B/D	C19, C10, C136	Collection Note Only
LPG European	12	N/A	N/A	Butane/Propane	UN1811/UN1878	BUTANE/PROPANE	2.1	B/D	C19, C10, C136	Collection Note Only
Binary Cylinders	18	N/A	N/A	Carbon Dioxide	UN1013	CARBON DIOXIDE	2.2	C/E	C19, C10, C136	Collection Note Only
Soda Stream	1.5	N/A	N/A	Carbon Dioxide	UN1013	CARBON DIOXIDE	2.2	C/E	C19, C10, C136	Collection Note Only
Refrigerants	14	N/A	N/A	Refrigerant gas	UN1978	REFRIGERANT GAS, N.O.S	2.2	C/E	C19, C10, C136	Collection Note Only
Medical Cylinders	17	N/A	N/A	Oxygen	UN1072	OXYGEN, COMPRESSED	2.2 (B, 1)	E	C19, C10, C136	Collection Note Only
Beer Keg	14	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Collection Note Only
High Pressure	53	N/A	N/A	Various	Various	(Various), COMPRESSED/DISSOLVED	Various	Various	Various	Collection Note Only
Non-Hazardous Waste Gas Pressure Vessels (EW C 18-05-05/15-01-04)										
Accumulators	32	18-05-05	R13	Nitrogen (Bottle)	UN184	WASTE ARTICLES HYDRAULIC (containing non-flammable gas)	2.2	E	C19	Collection Note + Waste Transfer Note
Fire Extinguishers	6	18-05-05	R04	Carbon Dioxide/Water/Foam/Powder	UN1044	WASTE FIRE EXTINGUISHERS	2.2	E	C19	Collection Note + Waste Transfer Note
Disposal Medium	4	18-05-04	R04	Helium Residue	UN1046	WASTE HELIUM, COMPRESSED	2.2	E	C19, C10, C136	Collection Note + Waste Transfer Note
Binary Cylinders	13	18-05-04	R04	Air Residue	UN1002	WASTE AIR, COMPRESSED	2.2	E	C19, C10	Collection Note + Waste Transfer Note
Gas Charge Cylinders	0.5	18-05-04	R04	Carbon Dioxide Residue	UN1013	WASTE CARBON DIOXIDE	2.2	C/E	C19, C10, C136	Collection Note + Waste Transfer Note
Life-Raft Inflators	6	18-05-04	R04	Carbon Dioxide Residue	UN1013	WASTE CARBON DIOXIDE	2.2	C/E	C19, C10, C136	Collection Note + Waste Transfer Note
Air Compressor Tank	8	18-05-04	R04	N/A	N/A	N/A	N/A	N/A	N/A	Collection Note + Waste Transfer Note
Non-Hazardous Calibration Cylinders	4	18-05-04	R04	Compressed Gas, N.O.S	UN1956	WASTE COMPRESSED GAS, N.O.S	2.2	E	C19, C10, C136	Collection Note + Waste Transfer Note
Water Pressure Vessels	5	18-05-04	R04	N/A	N/A	N/A	N/A	N/A	N/A	Collection Note + Waste Transfer Note
Hazardous Waste Gas Pressure Vessels (EW C 18-05-05)										
Canisters	0.2	18-05-04*	R13	Butane/Propane	UN1811/UN1878	WASTE BUTANE/WASTE PROPANE	2.1	B/D	C19, C10, C136	Collection Note + Assignment Note
Aerosols	0.2	18-05-04*	R13	Aerosol Gas	UN1950	WASTE AEROSOLS, Flammable	2.1	D	C19, C10, C136	Collection Note + Assignment Note
Non-Aqueal LPG	12	18-05-04*	R13	Butane/Propane	UN1811/UN1878	WASTE BUTANE/WASTE PROPANE	2.1	B/D	C19, C10, C136	Collection Note + Assignment Note
Halon Fire Extinguishers	1.5	18-05-04*	R13	ChloroFluro-bromomethane (Halon)	UN1874	WASTE CHLOROFLUORO-BROMOMETHANE	2.2	C/E	C19, C10, C136	Collection Note + Assignment Note
Non-Aqueal Refrigerants	14	18-05-04*	R13	Refrigerant Gas	UN1978	WASTE REFRIGERANT GAS, N.O.S	2.2	C/E	C19, C10, C136	Collection Note + Assignment Note
Flash Packs	9	18-05-04*	R13	Aerosol Gas	UN1950	WASTE AEROSOLS, Flammable	2.1	D	C19, C10, C136	Collection Note + Assignment Note
Hazardous Calibration Cylinders	4	18-05-04*	R13	Compressed Gas, N.O.S	UN1954	WASTE COMPRESSED GAS, FLAMMABLE, N.O.S	2.1	B/D	C19, C10, C136	Collection Note + Assignment Note
Lecture Cylinders	2	18-05-04*	R13	Various	Various	Various	Various	Various	Various	Collection Note + Assignment Note
LPG Autotanks	18	18-05-04*	R13	Propane	UN1878	WASTE PROPANE	2.1	B/D	C19, C10, C136	Collection Note + Assignment Note

8.1.1 Non-Leaking Cylinders

In the event that a load is identified as unacceptable upon discharge and does not comprise any leaking canisters, the waste shall be reloaded into the container if possible and isolated.

If, however, an unacceptable load is identified (with no leaking cylinders) and the haulier has exited the site, the load shall be transferred to the quarantine area as shown on the Drawing 2 018.1_09_004 Site Plan. The load will then be transferred off site to a suitable permitted facility for treatment and disposal and/or recovery. Rejected loads that don't comprise of leaking cylinders are to be removed from the site within five working days in accordance with the Environment Agency's 'Guidance for the Storage and Treatment of Aerosol Canisters and Similar Packaged Wastes' document.

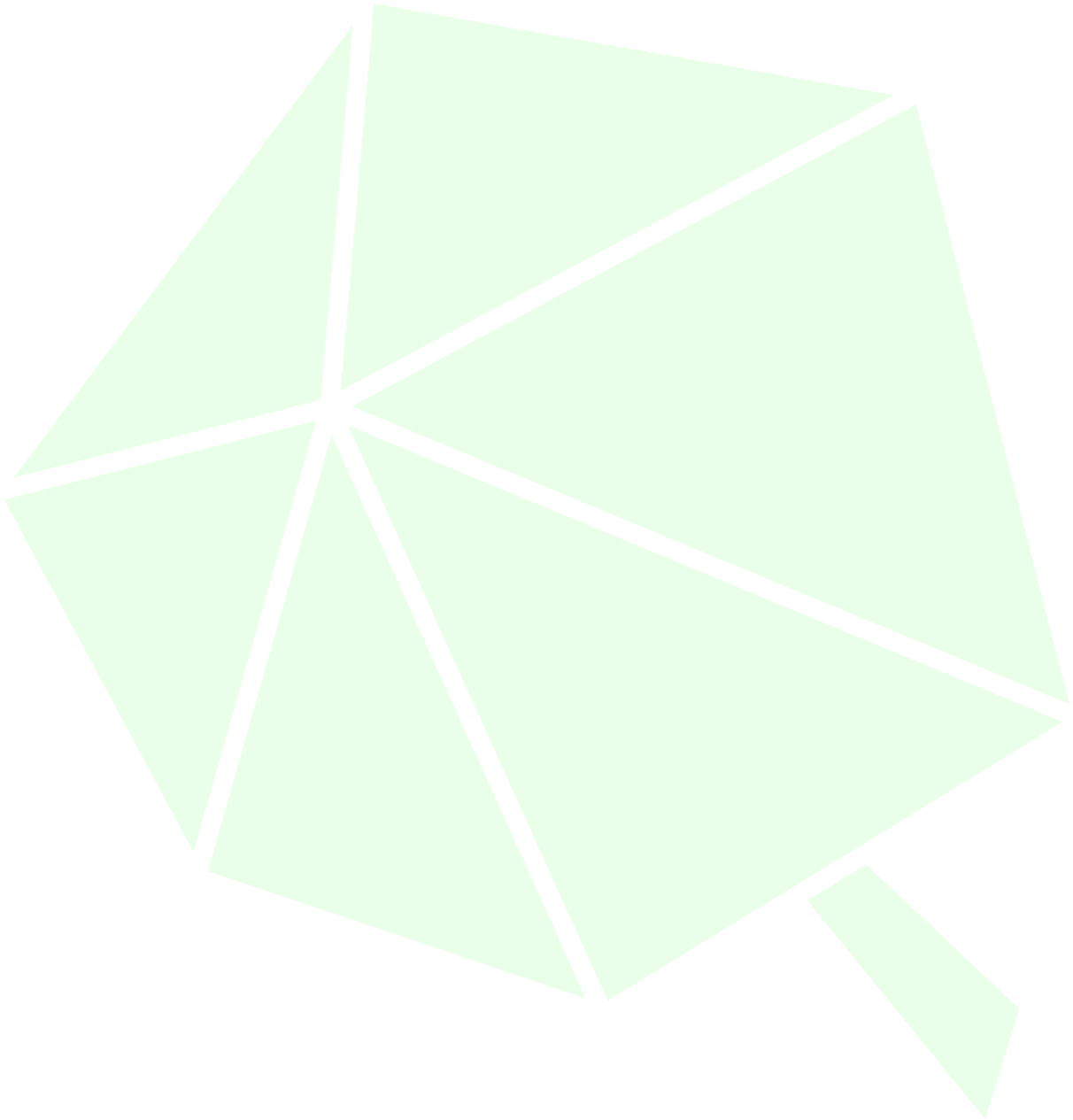
In the event that a load is identified as unacceptable and comprises leaking canisters, the leaking canisters will be transferred to the quarantine area prior to removal off site to a suitable permitted facility for treatment and disposal and/or recovery. The quarantine area is situated outside which ensures that sufficient ventilation is provided until the leaking has ceased. In accordance with the Environment Agency's 'Guidance for the Storage and Treatment of Aerosol Canisters and Similar Packaged Wastes' document, leaking canisters will not be removed from the site until the leaking has ceased or has slowed sufficiently to present no threat of a flammable atmosphere being generated during transport.

If necessary, the Environment Agency will be contacted to agree the most appropriate course of action. If a load is rejected, the following information shall be recorded:

- Time and date of incident.
- Haulier and vehicle registration number.
- Customer.

- Waste type; and
- Reason for rejection.

Records are kept of all rejected loads and these will be made available to the Environment Agency upon request.



9 WASTE STORAGE

9.1 Storage Areas

9.1.1 Storage Arrangements

As detailed on the Drawing 2 018.1_09_004 Site Plan, hazardous and non-hazardous wastes are stored within segregated areas. All waste commodities are segregated into individual bays within assigned storage areas. Hazardous waste streams are kept separate from non-hazardous wastes through a 2-meter segregation. All hazardous wastes are stored under sheltered roofing with an open front and back to allow for sufficient ventilation in the event of an unlikely build-up of an explosive atmosphere. Synergy have also taken extra precautions since the non-hazardous wastes that border either side of the hazardous storage area, are container extinguisher dry powder stores and un-processed fire extinguishers. This means that not only is the neighbouring waste inflammable, but it is also a fire suppressant and would therefore help to contain and suppress any potential fire that may arise within the hazardous stores acting as a fire break.

Waste cylinders are stored within IBCs in the relevant waste storage areas as shown on Drawing 2 018.1_09_004 Site Plan.

The IBCs comprise an open top and are situated outside to ensure sufficient ventilation is provided to prevent the build-up of combustible gases. Synergy also undertakes precautions to ensure that the risk of combustion is minimised on site. Synergy ensure that containers used to store waste canisters will not be overfilled which may result in the canister becoming actuated and lead to an accidental discharge of contents when the containers are stacked.

The storage areas for the waste materials comprise a roofed structure that comprise metal sheeting. This minimises contact with incidental rainfall that may result in an increased risk of corrosion. Furthermore, the IBCs have a series of holes (between 4 to 5 holes per container) drilled at the bottom measuring 1 inch in diameter. This allows any rainwater that may collect in the IBC to drain out and further minimise the risk of corrosion.

Plastics and rubber that are recovered from the treatment process are stored within a designated RoRo container (as shown on Drawing 2 018.1_09_004 Site Plan). Ferrous metals are stored within the same type of IBCs that are used to store waste gas cylinders and are situated within the designated non-hazardous waste storage area (as shown on Drawing 2 018.1_09_004 Site Plan). Non-ferrous metals are stored within sealed battery containers which are stored within an ISO container located to the south of the site.

To ensure that there is no cross contamination or reactions between incompatible materials, each waste stream is stored within separate containers which are segregated in to designated storage areas (as shown on Drawing 2 018.1_09_004 Site Plan). Each storage area is clearly marked to inform site operatives what waste is stored within each storage area to ensure that incompatible materials are not placed in the wrong areas.

Storage is in accordance with 1.7 Total Storage Quantities.

Synergy do not intend to exceed the reserved storage limits for waste fire extinguishers and non-hazardous gas canisters. However, the designated storage areas are designed to provide storage capacities that exceeds these limits to allow the storage of additional extinguishers/waste canisters if necessary.

9.2 Stock Management

To ensure that specified limits for hazardous and non-hazardous wastes are not exceeded, effective stock management procedures are implemented.

As part of the waste acceptance procedures, details regarding the type of waste, quantities and date of receipt are recorded and maintained within the site office. This information is reviewed in line with the site's remaining storage capacity and details of waste collections to ensure that the site does not exceed the proposed storage limits.

This information is used to ensure that the waste cylinders are not stored on site for prolonged periods. With reference to the Environment Agency's 'Guidance for the storage and treatment of aerosol canisters and similar packaged wastes' document, it is advised that canisters should not be stored on site for no longer than 3 months. At Merton Farm, gas cylinders are generally stored on site for two weeks prior to being transferred off site for disposal/and or recovery. This is managed by using the information that is generated from the waste acceptance procedures.

In the event that the site reaches the maximum storage capacity for hazardous and or/non-hazardous waste, Synergy will not make any arrangements to bring any more waste to the site until such time the waste that's currently stored on site is transferred off site to provide sufficient capacity to allow more waste to be delivered to the site.

To ensure that the total storage limit for non-hazardous waste is not exceeded, recyclables from the waste treatment process are collected and transferred off site every two weeks. However, in the event that the site reaches the maximum limit for non-hazardous waste between these collections and recyclables are found to be stored on site, Synergy may make arrangements to transfer the recyclables off site to provide capacity to accept additional waste fire extinguishers/gas cylinders if necessary.

All cylinders that are stored on site are visually inspected on a regular basis to ensure the continuing integrity and fitness for purpose. In the event that a pressure vessel is identified that may be susceptible to corrosion within the two-week storage period, the canister will be prioritised for onward transfer to minimise the risk of corrosion. Furthermore, in the event that any damage breaches the integrity of the canister so that it no longer meets the required standards, the canister will be subject to the waste rejection procedures.

10 WASTE TREATMENT

10.1 Waste Treatment – Non-Hazardous/Hazardous Fire Extinguishers & Cylinders

Synergy treat non-hazardous waste fire extinguishers and cylinders prior to onwards transfer for recovery. This activity is carried out in a designated area that is located to the south of the site see Drawing 2 018.1_09_004 Site Plan.

The treatment of fire extinguishers is limited to the discharge of the contents of the extinguisher and dismantling by removal of valves and other parts of the cylinder. This allows the recovery and onwards recycling of the metals, plastic and rubber at a suitably authorised facility.

The contents of water and foam extinguishers are discharged into sealed, closed-top IBCs prior to disposal off site at an appropriately authorised waste treatment facility. The IBCs are situated in a designated area as shown on Drawing 2 018.1_09_004 Site Plan and provide a maximum storage capacity of 1,000 litres.

The contents of dry powder extinguishers are discharged into sealed bags which are then stored in a sealed and lockable.

20 ft ISO container before being transferred off site to a suitable permitted facility for disposal. Different types of powder are stored separately to prevent cross contamination between the powders. The container for the storage of fire extinguisher powder is situated in a designated area Drawing 2 018.1_09_004 Site Plan.

In terms of recyclables that are recovered from the treatment process, plastics and rubber are stored within a designated 40-yard Roll On, Roll Off (RoRo) skip as shown on Drawing 2 018.1_09_004 Site Plan. With reference to the Environment Agency's Waste Conversion Factors spreadsheet (document reference LIT 10134) it has been noted that 40-yard RoRo containers are capable of providing a storage capacity of approximately 30.58 tonnes (or 30.58m³). However, it is unlikely that these containers will reach maximum capacity at any one time.

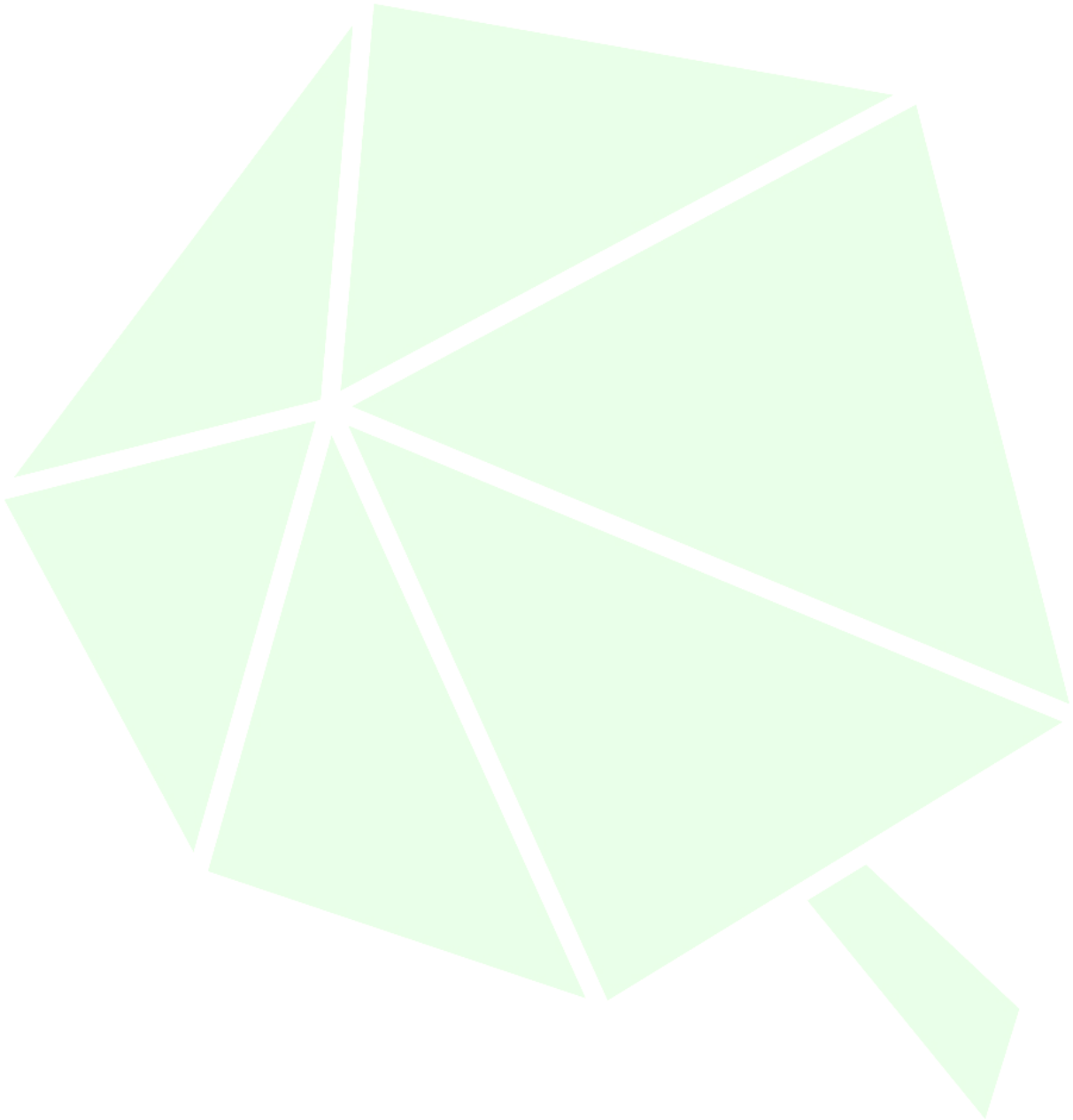
Ferrous metals are stored within open top IBCs which are situated within the designated non-hazardous waste storage area (as identified on the Drawing 2 018.1_09_004 Site Plan) prior to transfer off site.

With regards to non-ferrous metals, these are stored within sealed battery containers which are stored within an ISO container located to the south of the site as shown on the Drawing 2 018.1_09_004 Site Plan). These containers are clearly labelled to inform site operatives that only non-ferrous metals can be stored in these containers. A limit of 2 tonnes of non-ferrous metals will be stored on site at any one time. This volume forms part of the 15 tonnes limit that has been assigned to the recyclables.

Recyclables from the waste treatment process are collected and transferred off site every two weeks to a suitable permitted facility for recovery or if necessary, disposal.

Given that the proposed treatment process comprises the discharge of water and foam extinguishers, the waste treatment area benefits from a impermeable surface and a drainage system (as detailed on Drawing 4 018.1_09_009 Drainage Plan) to manage any surface water that maybe generated from the treatment process. As

detailed on the Drawing 4 018.1_09_009 Drainage Plan), any surface water that is generated in this area will drain towards an underground drain which will then flow towards an underground interceptor tank.



11 WASTE DISPATCH

Waste streams generated by the permitted activities will be sent off site for recovery or disposal at appropriately permitted facilities. These materials and other wastes will be removed from the site in accordance with strict waste management controls.

Loads are documented in accordance with Duty of Care requirements (e.g. Waste Transfer Note and Consignment Notes); prior to engaging contractors' due diligence checks are made (e.g. obtain and review a copy of the Environmental Permit for the receiving site, obtain copies of Carrier's Registration etc.) to ensure that materials are transferred to a suitably permitted facility by a licensed waste carrier. All vehicles are enclosed to ensure containment of the load.

Waste dispatch and delivery documentation are retained on site and can upon request be submitted to client or EA.

12 CONTINGENCY PLAN

12.1 Breakdowns

A lack of regular maintenance and scheduled services will lead to plant, vehicles and machinery breaking down more often or not fulfilling their intended function as efficiently. Daily defect sheets () are also essential to recognise a fault in its early stage to prevent major breakdowns from occurring. Poor site and working conditions contribute to the likelihood and frequency of defective machinery also. These factors minimise the chance of breakdowns of plant occurring. Synergy have back up plant to accommodate for all working procedures to minimise work downtime. Synergy also employ trained engineers who are qualified and able to make repairs on-site. If further repairs are required, Synergy make arrangements to send the plant for third-party repair off-site. In the event that plant, or vehicle breakdowns occur on site that may lead to oils or other COSHH applicable materials leaking, spill kits are located as per the site plan in key areas to limit environmental pollution. Staff use up to date risk assessments and method statements in order to ensure that all tasks carried out within maintenance procedures are safe and ensure that the environment and site personnel are not put in harm's way. Any maintenance involving liquids, namely oils and diesel on site is carried out by a trained staff member in close proximity to a spill kit should any leakages occur.

12.2 Enforced Shutdowns

In the event that Synergy are forced to cease operations whether it be as a result of an enforcement agencies request or as an internal decision for economic or safety reasons, management would prioritise the conservation of the environment. In the event that operations on site do stop such as through the COVID pandemic period with staff on furlough, management will ensure that a TCM is always fulfilling the minimum 20% coverage and will contract their back-up external TCM if required due to illness or other such unavailability. The TCM will ensure that operations are halted in a safe fashion as to ensure health and safety is protected. Processes being carried out that may be deemed as hazardous to the environment if left unattended will be allowed to be completed under supervision so that all workstations will be left compliantly. If the site is likely be suspended for more than one working day, staff will be instructed to safely store all plant and equipment within its allocated areas as per the site map to minimise any risk of security breaches, vandalism or fly-tipping. If an on-site investigation is required, staff will comply with any question from management or external regulatory bodies as to help minimise downtime and aid the investigation.

12.3 Staffing Shortages

Synergy have made provisions that annual leave must be approved by the TCM before it can be taken as to prevent staff shortages which could lead to the misallocation of staff and improper working practices being carried out by replacement staff members who may not be sufficiently training in some work areas. To minimise this risk further, Synergy have employed 25% extra staff than what has been deemed to be required to operate at a standard level. This is to ensure that staff are not overworked where accidents may occur and to allow for greater flexibility in

working arrangements. All yard staff are trained in all areas and working responsibilities within the site as per the Training Matrix which helps log and track any requirements for retraining or additional cover. In the event that there is a staff shortage, management will restrict certain areas of the working processes within the site as to allow for better prioritisation and effective work.

12.4 Extreme Weather and Climate Change

Extreme weather has been assessed and it has been deemed by the TCM that the area that the site is situated in geographically is not likely to present regular weather extremities. It has however been noted that irregular weather patterns can happen, and steps have been taken to protect staff and the environment from such events. It is also noted that climate change may lead to more unpredictable weather patterns and longer periods of extreme weather in the long term.

Prolonged heavy rainfall and wind is logged on the site diary and management deem that there is a risk to life, staff will be asked to stay at home. All fixtures on site have been rigorously tested and installed by professional contractors to be weather resistant even in extreme cases. If standing water accumulates on site, Synergy will continue to operate away from the area as to limit the risk of any COSHH spillages or contamination. The site is situated on a slight gradient which should prevent standing water from accumulating however if the site does become flooded, the emergency services and EA will be contacted, and steps will be taken to rectify the situation. During periods of heavy/prolonged rainfall, bunds and storage areas will be regularly checked and emptied of rainwater as to not affect their capability to hold hazardous liquids in the event of spillages.

During periods of drought and prolonged hot weather, Synergy are aware that hazards to both the environment and site staff can present themselves. Staff are provided with PPE such as sunglasses, breathable summer uniform and hats to aid comfort in hot weather, they are also encouraged to take more frequent breaks out of the sun if required. There is an additional risk to the environment through prolonged hot weather. All cylinders on site have been accepted on site following a rigorous 4 stage acceptance procedure as stipulated within this EMS and Operating Techniques manual. This helps prevent the site from accepting any damaged cylinder or pressure vessels that are likely to rupture or ignite in hot weather. Cylinders on site that fall within Synergy's acceptance criteria are robust and resistant to prolonged hot weather as it is required by the manufacturers of such cylinders to pass quality control standards for such reasons as they are designed to be stored in domestic gardens and other such unsheltered areas. To further mitigate any risk canister missiles or explosive atmospheres igniting through hot weather, the higher risk cylinders (namely hazardous wastes) are stored within the hazardous waste bay, which is sheltered from the sun and rain, with sufficient guttering, on impermeable site surface and open on four sides to prevent the accumulation of gases.

Due to the aforementioned preventative measures, it has been deemed that should extreme weather persist and a real risk to the environment present itself, Synergy will take steps to close the site (see site closures) until it is deemed that the weather has returned to a practicably safe condition to resume work. Synergy will also contact the HSE and EA to recommend with further steps and long-term solutions.

13 ACCIDENT/INCIDENT PREVENTION AND MANAGEMENT

Any accident or incident that has caused, is causing, or may cause significant pollution will be recorded.

These will be investigated by the TCM or senior management and where action is identified as being required, this will be recorded; responsibility will be allocated; preventative or corrective actions specified and completion required to an clearly defined time scale.

Accident Management

- All necessary measures are taken to prevent the occurrence of accidents. The types of accidents and the potential environmental consequences associated with them have been identified in the Environmental Risk Assessment that accompanies this documentation.
- It is considered that the most significant risk associated with the site is the unauthorised acceptance of non-compliant waste types. The waste acceptance procedures listed in Section 2 of this document aim to control and minimise this risk.

13.1 Fire Control

13.1.1 General Site Procedures

The following measures are implemented on site to minimise the fire risk.

As part of the waste acceptance procedures, all cylinders are visually inspected to establish the condition of the cylinder including any potential leaks. If any cylinder is found to be leaking, it is to be rejected.

All waste storage areas are inspected on a regular basis using a suitable flammable gas detector in order to identify any leaking canisters. If a canister is found to be leaking, it is to be removed from the storage area and stored within the quarantine.

Given that the waste storage areas are situated outside, there's the potential for steel pressure vessels to rust which can result in an increased risk of gas leaks. As such, site operatives remain vigilant during the waste storage inspection and during operating hours to identify any pressure vessels that may be affected by rusting. Any cylinders that are found to be rusting are prioritised for onward treatment and disposal and/or recovery.

Given that the site accepts canisters that are manufactured from different materials (i.e. aluminium, steel, mixed etc.), there is a potential risk of thermite spark between the canisters during handling and storage activities. Each waste stream is stored within separate containers to prevent cross contamination. This procedure also considers the construction material of the canister to prevent the risk of thermite spark. For example, non-hazardous waste canisters that are manufactured from aluminium are stored in one IBC and non-hazardous waste canisters manufactured from steel are stored in another.

The operator enforces a strict 'No Smoking Policy' on site and prohibits the use of equipment that may be considered as a potential source of ignition including mobile phones within the DSEAR highlighted zones. Hot

works and the use of naked flames are also be prohibited within these zones and must be restricted to designated processing areas away from the storage of waste or gas cylinders.

To ensure that this is reinforced, all visitors, contractors and site operatives are required to report to the site office upon arrival and confirm whether they are in the possession of any items that may be considered as a potential ignition source. If so, they will be required to leave such items in site office where they will be kept throughout the duration of the site visit. Clear signage is also established at the site entrance and across the site to inform all visitors, contractors and site operatives of prohibited activities.

Furthermore, all visitors, contractors and site operatives are required to undertake a site induction where they are informed of the procedures and measures in relation to fire prevention and response.

All inductions are signed off by an on-site Manager and the participant and a record is maintained in the site office for reference. Such records are monitored on a regular basis to ensure that all staff, contractors and regular visitors are trained in the latest measures and procedures. In the event that the operator applies any changes to the site procedures, all staff, contractors and regular visitors will be required to complete a refreshed induction.

In light of the above, it is considered that the most likely source of ignition from on-site activity will be from mobile plant and vehicles delivering the cylinders to the site. To minimise the risk of combustion, all mobile plant and vehicles are maintained in accordance with the Planned Preventative Maintenance Programme (**Error! Reference source not found.**). In addition, all vehicles and mobile plant are required to switch their engines off when cylinders are being loaded/unloaded from the vehicle. In addition, all mobile plant is specially adapted for use in flammable atmospheres to ensure that there is no risk of combustion when the plant is moving any leaking canisters on site.

At the end of the day, vehicles and mobile plant are stored within designated areas as shown on the Drawing 2 018.1_09_004 Site Plan. As noted on the Site Plan, a minimum separation distance of 6 m is maintained between the HGV/mobile plant parking area and the non-waste LPG storage area to minimise the risk of combustion from the vehicle exhausts. This is reinforced by site operatives who direct HGV/mobile plant drivers when parking.

Firefighting equipment is kept in an appropriate location as advised by the Compliance Manager or the local Fire Service. Where appropriate, mobile plant and vehicles are fitted with firefighting equipment. All firefighting equipment is kept in good condition, unobstructed and is serviced at least once a year by a competent person.

Any fire on the site is to be treated as an emergency and will be extinguished at the earliest opportunity. If necessary, the Fire Service will be summoned. Any incidents of fire will be reported to the EA and recorded in the Site Diary.

In addition to the measures detailed above, Synergy operates in accordance with a Fire Prevention Plan (FPP) which solely relates to combustible recyclable materials that are recovered from the waste treatment process.

13.1.2 Fire Detection System

Synergy have installed industrial outdoor rated fire detection systems which will include outdoor rated smoke detectors and a CCTV system which will be monitored in the site office by staff to identify any potential fire risks in areas that are not instantly visible to on-site workers. The location of the smoke detectors (Drawing 5 FIRE ALARM - RCC AREAS) and CCTV cameras are identified on the Drawing 2 018.1_09_004 Site Plan.

In the event that the smoke detectors identify any smoke on site, an alarm will be activated which will notify all on-site workers. Once the alarm has been activated, the Site Manager and the designated fire marshal will assess the area and employ the most appropriate course of action. If necessary, the designated fire marshal will contact the Local Fire Service who will advise on the most appropriate course of action.

Given that the site will not operate 24 hours a day, Synergy have considered the risks to arson and vandalism outside operating hours. In order to minimise these risks, a proximity alarm system is installed to cover the perimeter of the site as shown on the Site Layout. The system is designed to detect irregular movements along the site perimeter where trespassers may gain access. In the event that the alarms detect a security breach, the system will send a notification to designated members of staff as well as the security provider.

Following notification via mobile application, the designated members of staff can remotely access the CCTV cameras and will assess the situation on site. If a threat is detected, the emergency services will be informed, and an audible alarm will be activated on site to deter any trespassers from any further action.

The fire detection and security systems mentioned above are subject to regular maintenance by an appropriate UKAS accredited third party scheme in accordance with the manufacturer's requirements. This forms part of the site's Planned Preventative Maintenance programme (**Error! Reference source not found.**).

As detailed on Drawing 2 018.1_09_004 Site Plan, the storage areas for the waste gas cylinders are adjacent to the waste reception and sorting/distribution area. During operating hours, two site operatives are assigned to these areas and will be required to monitor the waste gas cylinder storage areas. This helps to identify any potential fire risks at an early stage and allow a prompt response to minimise the risk of a fire occurring.

During the operating hours, there must also be at least one fire marshal on site who will be trained in managing an emergency fire situation. The Yard Manager will inform the fire marshal of the types of gas cylinders that are stored on site and therefore will be aware of the potential fire risks. During the working day, the Yard Manager visually inspects all areas where any gas cylinders are stored. This helps to identify any potential fire risks at an early stage and allow for a prompt response to minimise the risk of a fire occurring.

13.1.3 Fire Fighting

All pressure vessels and IBCs are handled using forklift trucks. This helps to facilitate active firefighting as the forklift trucks can be used to move IBCs away from any potential fires and therefore minimise the risk of fire

spreading. This will only be undertaken if the Local Fire Service have advised that it is safe to do so and by staff who are trained and licensed to operate the plant.

Firefighting equipment is located in the site office and at each emergency exit. All firefighting equipment is compliant with the product specification.

Daily checks of all firefighting equipment are incorporated into the site diary checklist. In the event that any firefighting equipment is identified to breach the required standards, necessary remedial work will be undertaken as soon as practicable. Any non-conforming equipment will be clearly marked to inform staff and prevent use until the necessary remedial works are complete.

All staff are made aware of the location of all firefighting equipment and are adequately trained in their correct use.

In addition to firefighting equipment, the site is equipped with a water storage tank that stores 20,000 litres of water. The tank is equipped with a diesel water pump and fire hose/nozzle combination which can be used by the local fire service to suppress any fires that may occur on site. The location of the water storage tank is identified on the Drawing 2 018.1_09_004 Site Plan.

The water storage tank and its accompanying features are subject to regular maintenance procedures in accordance with the manufacturer's requirements to ensure continuing integrity and fitness for purpose. All site operatives are also adequately trained to ensure that they are competent to operate the suppression system in the event of a fire

Table 3 Accident Prevention and Management

Possible Accident/Incident	Receptor	Pathway	Consequence	Likelihood	Risk Management	What to do if the accident/incident occurs
Transferring substances (spillage during handling)	Bedrock Layer (no superficial layer above) - Principal Aquifer	Through hard standing	There is a low consequence should the inert wastes be spilt during transfer between containers. Should there be a spillage of an oil or a fuel then contamination may occur, however, these materials are rarely used on	LOW	Transfer of all substances to be undertaken on an area of hard standing waste is unlikely to permeate the hard standing in its solid form. Continual monitoring and maintenance of surfaces.	Spillages will be cleaned up immediately upon detection. Spills kits located at strategic locations around the site will be deployed in the event of spillage. Details of the spillage will be recorded and retained. In the event of a significant spillage which has the

Possible Accident/Incident	Receptor	Pathway	Consequence	Likelihood	Risk Management	What to do if the accident/incident occurs																			
			site and only handled under controlled conditions.			potential to cause environmental pollution the Environment Agency will be informed as soon as is reasonably possible																			
	<p>Neighbours</p> <table border="1"> <thead> <tr> <th>ID #</th> <th>DESCRIPTION</th> <th>DISTANCE FROM BOUNDARY (M) APPROX</th> <th>DIRECTION</th> </tr> </thead> <tbody> <tr> <td>-</td> <td>Site Workers</td> <td>On site</td> <td>-</td> </tr> <tr> <td>-</td> <td>Site Visitors</td> <td>On site</td> <td>-</td> </tr> <tr> <td colspan="4" style="background-color: #FFD700;">COMMERCIAL</td> </tr> <tr> <td>1</td> <td>Multiple Commercial</td> <td>0 m</td> <td>W</td> </tr> </tbody> </table>	ID #	DESCRIPTION	DISTANCE FROM BOUNDARY (M) APPROX	DIRECTION	-	Site Workers	On site	-	-	Site Visitors	On site	-	COMMERCIAL				1	Multiple Commercial	0 m	W	Dispersion through the air	<p>Dust and litter nuisance to surrounding neighbours.</p> <p>Due to the nature of their business</p>	LOW	Materials are large and stored in their largest format within containers.
ID #	DESCRIPTION	DISTANCE FROM BOUNDARY (M) APPROX	DIRECTION																						
-	Site Workers	On site	-																						
-	Site Visitors	On site	-																						
COMMERCIAL																									
1	Multiple Commercial	0 m	W																						

Possible Accident/Incident	Receptor			Pathway	Consequence	Likelihood	Risk Management	What to do if the accident/incident occurs
		Units at Merton Farm			activities this may be more problematic to some neighbours than others.			
		RESIDENTIAL						
	1	Multiple Residential Properties off Merton Lane	185 m	E				
		PUBLIC RIGHTS OF WAY (PROW)						
	-	Footpath between Iffin Lane & Merton lane	30 m	W				
		ROADS & RAILWAYS						
		Merton Lane	121 m	N				
		RECREATIONAL						
	1	Canterbury Rugby Football Club	183 m	NNE				
		AGRICULTURAL						
1	Packets of Arable Land south of Dover Road (A2) and west of Nackington Road	0 m	S					
	GROUNDWATER							

Possible Accident/Incident	Receptor			Pathway	Consequence	Likelihood	Risk Management	What to do if the accident/incident occurs
	-	Bedrock Layer (no superficial layer above) - Principal Aquifer	On site	-				
	HERITAGE SITES							
	1	2 No. Grade II Listed Buildings - Merton Farmhouse	123 m	NW				
	Arable farmland (surrounding site)							
	Surface water features			Overground flow	Contamination and dispersion within wider water bodies.	LOW	Transfer of liquids to be undertaken within secondary containment.	
Plant or equipment failure	Site workers			Direct contact	Severe personal injury could result.	LOW	All site personnel must wear	Record and retain all plant and equipment

Possible Accident/Incident	Receptor	Pathway	Consequence	Likelihood	Risk Management	What to do if the accident/incident occurs
					<p>PPE at all times, and be trained in the safe operations of plant and equipment. Plant and equipment is maintained in accordance with a strict maintenance schedule to ensure risk of breakdown or failure is minimal.</p>	<p>failures on site. Where plant or equipment failure has the potential to cause injury or pollution ensure that issue is clearly communicated to all relevant individuals to prevent further use. Where plant or equipment failure results in a leak or spillage ensure the spillages is</p>

Possible Accident/Incident	Receptor	Pathway	Consequence	Likelihood	Risk Management	What to do if the accident/incident occurs
	Bedrock Layer (no superficial layer above) - Principal Aquifer	Through hard standing	Contamination of surrounding area and dispersion within the wider groundwater environment.	LOW	Spill equipment available should oils or fuels be released from plant or equipment. Plant and equipment maintained in accordance with a strict maintenance programme to ensure a limited risk of failure.	cleaned up immediately upon detection and the faulty plant/equipment is stored on an impermeable surface.

Possible Accident/Incident	Receptor	Pathway	Consequence	Likelihood	Risk Management	What to do if the accident/incident occurs
Containment failure	Bedrock Layer (no superficial layer above) - Principal Aquifer	Leaking through cracked or overtopped bunding/containment feature	Contamination of surrounding area and dispersion within the wider groundwater environment.	LOW	Daily site checks will ensure ongoing inspection of the integrity of containment features.	<p>Spillages will be cleaned up immediately upon detection.</p> <p>Spills kits located at strategic locations around the site will be deployed in the event of spillage.</p> <p>In the event of a significant spillage which has the potential to cause environmental pollution the EA will be informed as soon as is</p>

Possible Accident/Incident	Receptor	Pathway	Consequence	Likelihood	Risk Management	What to do if the accident/incident occurs																
						reasonably possible.																
Fire	Site operatives and infrastructure	Direct contact	Loss/damage of property. Injury. Business disruption.	LOW	Fire Prevention Plan (FPP 018.1_05_004) All plant and equipment	With ongoing maintenance of plant and equipment risk of fire is low. Management systems for business continuity will aid																
	Neighbours																					
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Possible Accident/Incident	Receptor			Pathway	Consequence	Likelihood	Risk Management	What to do if the accident/incident occurs
	1	Multiple Commercial Units at Merton Farm	0 m	W			maintained to a schedule. Key business processes and documentation stored remotely for business continuity purposes.	in the event of a fire.
	RESIDENTIAL							
	1	Multiple Residential Properties off Merton Lane	185 m	E				
	PUBLIC RIGHTS OF WAY (PROW)							
	-	Footpath between Iffin Lane & Merton lane	30 m	W				
	ROADS & RAILWAYS							
		Merton Lane	121 m	N				
	RECREATIONAL							
	1	Canterbury Rugby Football Club	183 m	NNE				
	AGRICULTURAL							
1	Packets of Arable Land south of Dover Road (A2) and west of	0 m	S					

Possible Accident/Incident	Receptor			Pathway	Consequence	Likelihood	Risk Management	What to do if the accident/incident occurs
		Nackington Road						
	GROUNDWATER							
		Bedrock Layer (no superficial layer above) - Principal Aquifer	On site	-				
	HERITAGE SITES							
	1	2 No. Grade II Listed Buildings - Merton Farmhouse	123 m	NW				
Storage of hazardous substances	Site operative			Direct contact	Injury or ill health.	LOW	No hazardous substances are stored on site. If handled personnel must be wearing	All hazardous substances stored in suitable containment with bunding (where applicable). Hazardous substance storage areas are
	Bedrock Layer (no superficial layer above) - Principal Aquifer			Through hard standing	Contamination of underlying ground and groundwater.			

Possible Accident/Incident	Receptor	Pathway	Consequence	Likelihood	Risk Management	What to do if the accident/incident occurs
					appropriate PPE.	separate from operational areas. All hazardous substances will be stored in secured containers which will be locked when not in use.
Vandalism	Plant and Equipment or site infrastructure	Direct contact	Impact on business processes	LOW	The site is secured by a 2.2 m security fence and gated. Site is also monitored by CCTV.	Ensure vandalism has not resulting in an environmental pollution incident. Inspect the site for damage and record and retain results.

Possible Accident/Incident	Receptor	Pathway	Consequence	Likelihood	Risk Management	What to do if the accident/incident occurs
Flooding	Site infrastructure	Direct	N/A	N/A	The site is not within a floodplain.	N/A

14 COMPETENCE AND TRAINING RECORDS

14.1 Management

A TCM holds the relevant competence through schemes approved under the Environmental Permitting (England and Wales) Regulations 2016 (as amended)¹.

Details of TCM will be provided to the EA and reported through the national operator waste returns. Copies of Certificates will be held at the site office. At times where the specified TCM(s) is/are unavailable, alternative TCM cover arrangements will be made.

Responsibilities include day to day operations and activities at the site, ensuring compliance with the Permit and planning conditions, ensuring compliance with Health and Safety Policy, responsible for fire safety at the site and liaison with the EA and other regulatory bodies.

14.2 Staff

All site staff will be given instruction on relevant elements of the Environmental Permit, the FPP, this EMS and the wider management system; to effectively and efficiently carry out their job function. Training will be documented, and records kept.

All staff members are given training on fire safety and will receive refresher training as appropriate.

Staff members are shown the correct methods of using fire extinguishers during fire drills. All employees are trained to detect and respond to fires, and to implement measures to control fire water.

14.3 Competence & Awareness Training

All site staff will be given relevant training and supervision on the procedures, plant, mobile plant and equipment used at the site.

¹ <https://wamitab.org.uk/wp-content/uploads/2020/06/CIWM-WAMITAB-Operator-Competence-Scheme-Version-9-Final.pdf>

15 ENVIRONMENTAL EMISSION CONTROLS

15.1 Fire Prevention

See FPP 018.1_05_004.

15.1.1.1 *Persistent Organic Pollutants (POPs)*

Not accepted.

15.1.2 Security

Site security will be in operation during the working day. The site is fully enclosed with 2.2m high perimeter fencing and a lockable gate which is kept closed and locked outside hours of operation to prevent unauthorised access to the site and thereby prevent the risk of arson attacks or vandalism. The facility will comprise a CCTV system which will be monitored in the site office by the operators. All visitors will also be required to report to the office to sign in and will be accompanied at all times unless authorised otherwise. Any unauthorised visitors found on site will be challenged and asked to justify their presence and sign in or leave. All visitors will be informed about the site fire safety precautions as part of the site induction procedure.

Given that the site will not operate 24 hours a day, Synergy have considered the risks to arson and vandalism outside operating hours. In order to minimise these risks, a proximity alarm system will be installed to cover the perimeter of the site as shown on the Drawing 2 018.1_09_004 Site Plan. The system will be designed to detect irregular movements along the site perimeter where trespassers may gain access. In the event that the alarms detect a security breach, the system will send a notification to designated members of staff as well as the security provider.

Following notification, the designated members of staff will remotely access the CCTV cameras who will assess the situation on site. If a threat is detected, the emergency services will be informed and an audible alarm will be activated on site to deter any trespassers from any further action.

15.2 Litter Control

All incoming and outgoing loads are covered.

The site is subject to regular housekeeping and staff are required to litter pick on a 'see it, pick it up' basis.

Whilst unlikely, where litter is identified as a nuisance at or near to the site boundary, the Site Manager will immediately organise the collection of litter.

The source of the litter will be investigated and removed to a covered container ready for disposal.

15.3 Odour Control

The types of materials received at the site mean that, under normal circumstances, they do not contain putrescible wastes. Whilst unlikely, where such material is observed the following measures have been put in place to minimise risk.

If putrescible waste is detected this is contained within a general waste container and arrangements made for disposal.

Any odour complaints received at the site will be investigated by the TCM and their findings will be used to inform corrective and preventative actions.

15.4 Dust Control

Due to the nature and quantities of the materials received on site the likelihood of dust generation is limited. Nevertheless, operations are conducted to ensure that risk is negligible. Waste processing is internal and all waste is stored in containers.

Visual inspection of external site areas will be made daily for dust generation and/or deposition. Regular inspection of the site perimeter will also be made to assess for presence outside the site boundary.

Findings will be recorded in the site diary, and corrective/preventative action taken as appropriate.

15.5 Noise and Vibration Control

Noise will be monitored qualitatively daily and, where risk assessment identifies any occupational exposure issues this will be addressed through the provision of appropriate personal protective equipment (PPE).

Vehicles will be maintained to manufacturer's guidelines to ensure operation does not lead to noise and vibration above that set out in the manufacturer's specification information.

15.6 Birds, Vermin and Pest Control

The types of wastes accepted and stored at the site are unlikely to generate significant issues relating to the attraction or harbouring of pests, vermin or birds.

All reasonable measures will be taken to prevent and minimise the occurrence of pests.

Daily site inspections and good housekeeping procedures will be maintained in order to reduce any occurrence and allow appropriate measures to be taken where necessary.

If an increase in a pest population is observed, the source will be investigated in order to undertake the most effective mitigation measures.

15.7 Mud and Debris Control

The likelihood of vehicles carrying significant volumes of mud or debris which would then be tracked onto main roads is limited. However, vehicles will be visually checked in wet conditions. Any vehicles found to be carrying mud or debris on the wheels or chassis will be cleaned down prior to exiting site.

Where observation identifies an issue, this will be recorded in the daily site inspection List along with any subsequent corrective or preventative actions.

15.8 Summary of Maintenance and Inspection

A Planned Preventative Maintenance programme (**Error! Reference source not found.**) is incorporated into the Environmental Management System to minimise the risk to safety, health and the environment by ensuring that all appropriate items and elements within the site are serviced and inspected on a regular basis or to the manufacturers' maintenance schedules.

Details of faults, breakdowns and repairs are documented, and records are maintained at the site office. Faults and breakdowns will be investigated, and the service schedule revised if necessary

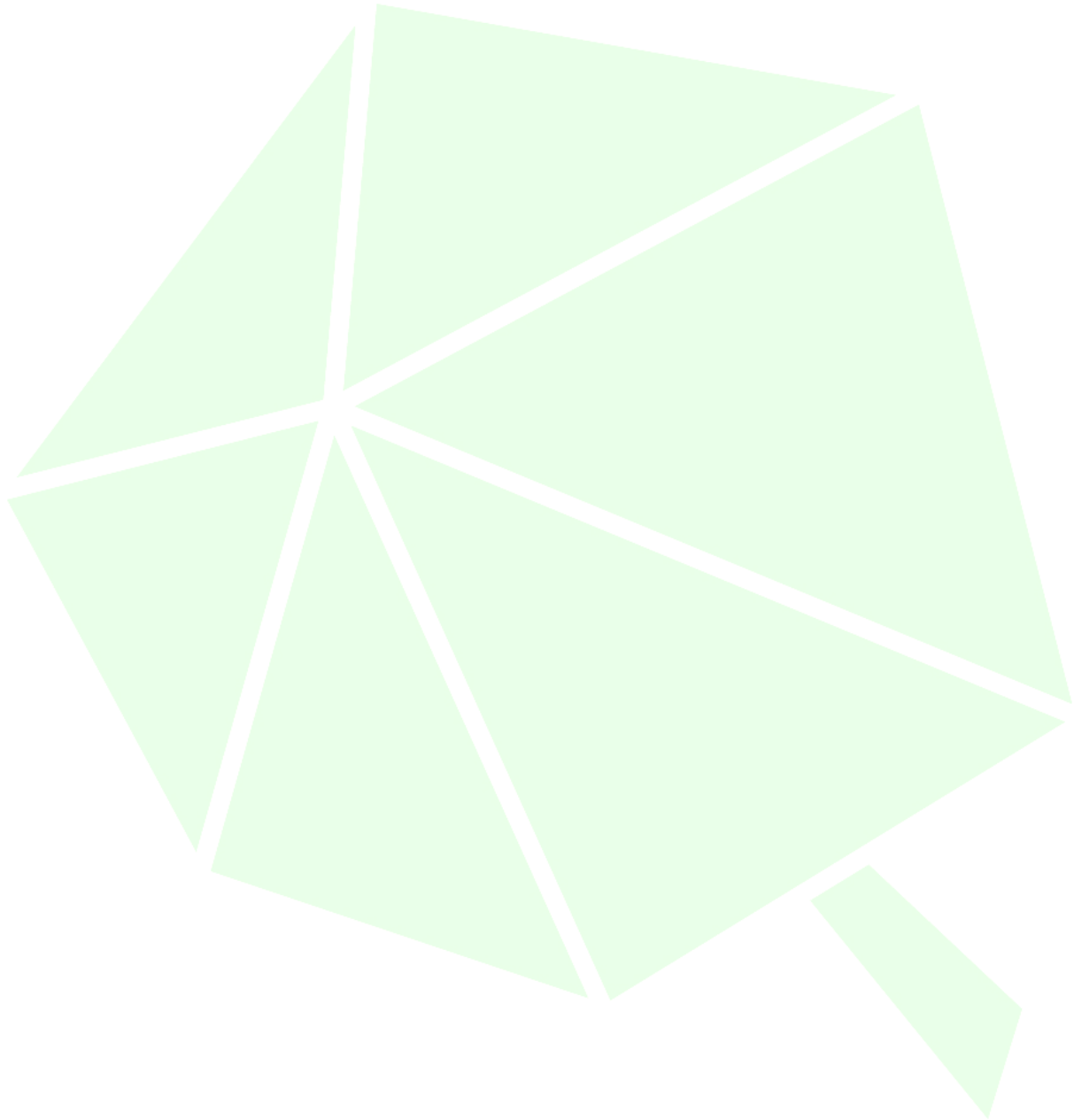
Table 4 Maintenance and Inspection

Equipment	Inspection Schedule	Look for	Responsible Person	Repair / Replacement Timescale
Hardstanding Surfaces	1x per week	State of repair and damage	TCM or Site Manager	5 days
Security Fences	1 x per day visual	Damage	TCM or Site Manager	1 day temporary. 5 days permanent.
Litter blow, odour, dust, noise, birds, mud	Daily visual inspection, constant attention	Ensure no off-site problem	TCM, Site Manager and all site staff	Immediate cease of problem or removal of source from site.
Vermin and pests	Daily visual plus monthly visit	Absence of vermin and pests	Site Manager and Appointed contractor	Call in contractor to initiate immediate treatment
Fire Equipment	1 / week visual	Visual damage.	Site Manager	3 days

Equipment	Inspection Schedule	Look for	Responsible Person	Repair / Replacement Timescale
	Annual formal	Working order	Specialist Contractor	
Roof drains and gutter, building structure, lights, ventilation and drainage system.	Annually	Continued use and effectiveness	Site Manager	5 days
Process machinery	According to manufactures instructions	Wear of blades, greasing of machines, and other routine checks required by manufacturer	TCM or appointed contractor	5 days
Gully Pot proximate to activity	Weekly	Damage to mesh basket & build-up of particles and sediment	Site Manager	Repair / remove sediment – 3 days
Interceptors	Quarterly	Build-up of debris and sediment associated with permitted operations	TCM or Site Manager	If build-up of sediment associated with permitted operations is noticed, arrange removal within 7 days

16 CLIMATE

See climate change risk assessment Appendix 9 Climate Change Risk Assessment.



17 EMISSIONS MONITORING

17.1 Emissions Control

17.1.1 Point Source Emissions to Air

There are no point source emissions to air as a result of operations.

17.1.2 Point Source Emissions to Groundwater

There are no point source emissions to groundwater as a result of operations.

17.1.3 Point Source Emissions to Surface Water and Sewers

There are no point source emissions to surface water or sewer as a result of operations.

17.1.4 Fugitive Emissions

Fugitive emissions have been identified as a potential environmental risk resulting from operations, as detailed in the Environmental Risk Assessment.

18 RAW MATERIALS

Waste returns are submitted to the EA for all wastes received and dispatched. Monitoring of raw water and energy use on site is carried out via supplier invoices and records of these are maintained. Use of hydraulic and lubricating oils is monitored via purchase invoices.

Table 5 Raw Material Monitoring

Schedule 1 activity	Description of raw material and composition of raw material	Maximum amount daily	Annual throughput	Description of how raw material is used including main hazards	Justification for use (Form B3 Q6d)	Reducing waste arising from raw materials
Section 5.3 (a) (ii) - haz waste installation – physico - chemical treatment	Electricity	Unknown as new site will be monitored for first year to identify.	Unknown as new site will be monitored for first year to identify.	No hazards associated other than slips, trips, falls etc.	Treating waste for further recovery to reduce waste to landfill. Segregation of hazardous and non-hazardous waste	N/A
Section 5.4 (a)(ii) - non - hazardous waste installation – physico - chemical treatment	Electricity	Unknown as new site will be monitored for first year to identify.	Unknown as new site will be monitored for first year to identify.	No hazards associated other than slips, trips, falls etc.	Treating waste for further recovery to reduce waste to landfill. Segregation of hazardous and non-hazardous waste	N/A
Section 5.6 - temporary storage of hazardous waste	N/A	N/A	N/A	N/A	N/A	N/A

Mobile Plant	Description of raw material and composition of	Maximum amount daily	Annual throughput	Description of how raw material is used	Justification for use (Form B3 Q6d)	Reducing waste arising
--------------	--	----------------------	-------------------	---	-------------------------------------	------------------------

	raw material			including main hazards		from raw materials
Mobile plant	Diesel	Unknown as new site will be monitored for first year to identify.	Unknown as new site will be monitored for first year to identify.	Fuel/engine oil for fork lift truck. Main hazard would be spillages.	Moving waste around site to enable treatment/transfer.	N/A
Fixed plant	Electricity	Unknown as new site will be monitored for first year to identify.	Unknown as new site will be monitored for first year to identify.	Moving parts Main hazard would be spillages.	Processing waste.	N/A

19 COMMUNICATION

19.1 Complaints

On receipt of a complaint, the TCM, or their nominated person, will investigate the complaint to see if the cause can be established and if substantiated, resolved swiftly. Where additional time is required to undertake repair or replacement of infrastructure which has caused the complaint the complainant will be contacted with details on the actions being taken and the estimated timescale for completion.

All complaints will be acknowledged and investigated, with resultant actions reported to the complainant and records kept.

19.2 Non- Conformances, Corrective Actions and Preventative Measures

Any non-conformances recorded by the TCM or the EA will be actioned in a timely manner or in line with an appropriate time scale set by the EA.

Non-conformances will be remedied so that the operation that led to the non-conformance is prevented or changed, to ensure compliance with the environmental permit.

Corrective actions will be recorded in the daily site inspection List. An record of this will be created see appendix B.

20 INFORMATION AND RECORDS

20.1 Records Keeping

Synergy have an EMS which is compliant with ISO14001 and this includes procedures for the management of documentation.

A record of all waste delivered to the site and materials leaving the site are maintained (including consignment notes and transfer notes) will be kept on site for a minimum of 6 years.

A Site Diary is kept in the site office and updated on a daily basis. This diary is used to record any incidents on site involving accidents, spillages, vandalism, complaints etc. This provides an ongoing record and allows for investigative and corrective actions to take place in line with the requirements of the company's EMS.

- The Site Diary includes the following:
- The name of the Certificate of Technical Competence holder attending the site on any particular date.
- Details of all visitors, including status and times of arrival and departure.
- Details of maintenance, modification, repair, replacement, delivery and return, and breakdown of any plant and machinery in line with the principles of planned preventative maintenance.
- Weather conditions.
- Non-conforming wastes and actions taken; and
- Any damage to vehicles, fences, gates etc and incidents of trespass.

A copy of the Environmental Permit and associated documents are kept in a convenient location in the site office allowing suitable access for all persons working on or visiting the site.

Staff training records are also kept on file throughout the entire time the staff member is employed by Synergy Recycling. Training records are also referenced within the Training Matrix which is accessible upon request by any member of staff and managed by the TCM, Sam Roud. This is reviewed on a monthly basis and actions such as booking retraining or refresher courses are taken as a result. Staff non-conformances, accident reports and near miss reports are also help on file for review

20.2 Records and Reporting

Table 6 Records Required by the Permit

Condition	Requirement	Record
1.1	Records to demonstrate activities are managed in accordance with a written management system.	This Management Plan and associated management system documents.

Condition	Requirement	Record
1.1	Records to demonstrate activities are managed by sufficient competent persons and resources.	Evidence of technical competence. Staff training records.
TBC	Records of all waste accepted on site.	Duty of Care Waste Transfer Notes.
TBC	A quarterly summary report relating to the site and the waste accepted and removed from it during the previous quarter. Q1 Jan – Mar Q2 Apr by 30 th April – Jun by 31 st July Q3 Jul – Sep by 31 st October Q4 Oct – Dec by 31 st January	Waste Return

20.3 Notification

Table 7 Notifications Required by the Permit

Condition	Requirement	When
TBC	Detection of any malfunction, breakdown or failure of equipment or techniques, accident or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution.	Without delay using Schedule 5 Form
TBC	Any breach of a limit specified in these standard rules.	
TBC	Any significant adverse environmental effects.	
TBC	Changes to the operator's trading name, registered name or registered office address.	Within 14 days
TBC	Any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.	Within 14 days

Condition	Requirement	When
TBC	Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations	Within 14 days – notification should contain a description of the proposed change in operation.

20.4 Security of Records

Records shall be kept securely within the site office. Where held electronically these shall be backed up on a regular basis and a copy held off site.

20.5 Availability

In accordance with the condition requiring records to be kept, all records required under the terms of the Permit shall:

- Be legible;
- Be made as soon as reasonably practicable;
- If amended, be amended in such a way that the original and any subsequent amendments remain legible or are capable of retrieval; and
- Be retained, unless otherwise agreed with the EA, for at least 6 years from the date when the records were made, or in the case of the following records until Permit surrender:
 - Off-site environmental effects; and
 - Matters which affect the condition of land and groundwater.

All records, plans and the management system required to be maintained by the Permit shall be held on site.

21 REVIEW MANAGEMENT SYSTEM

The EMS will be reviewed in its entirety at least annually or following any substantial change in site operations or complaint.

Other activities which may prompt review of the EMS are variations to the environmental permit, accident, complaint, breach or a change in the site setting or sensitive receptors.

Where the review results in required changes, this will be documented and maintained with the site records, for example, waste storage volumes, changes to abatement measures, new or altered equipment.

22 SITE CLOSURE

During the lifetime of Synergy Asset Services Limited operation of the permitted site they will maintain records pertaining to the condition of the site. This will include information regarding any environmental incidents, improvements or changes to containment or abatement features, records of monitoring events, or any other details which may have impact on the site's condition.

This information will be used to support a permit surrender application when the site operations cease.

22.1 Site Closure Procedures

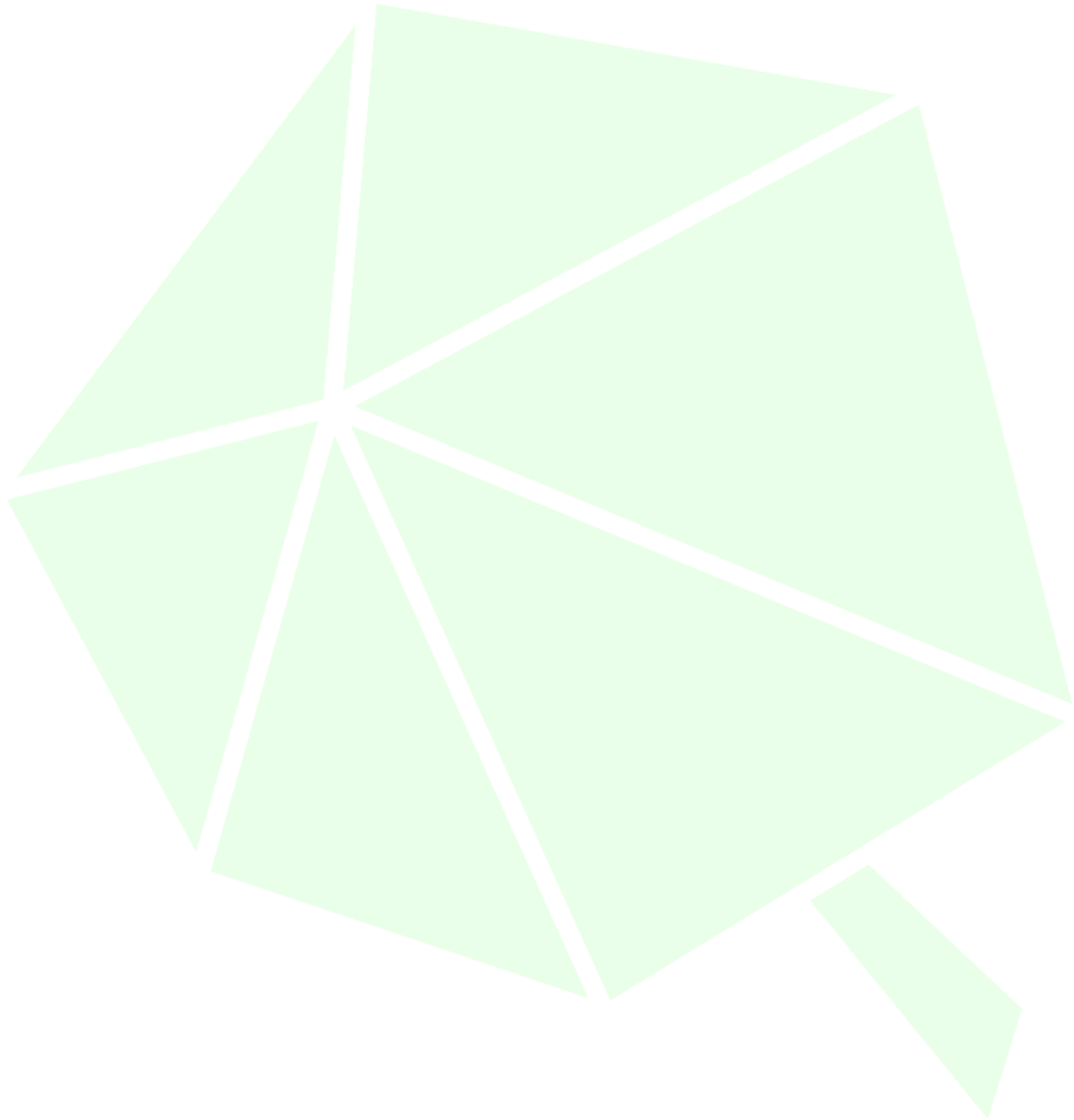
In the event that Synergy Recycling decide to close the Merton Farm site, steps will be taken to ensure that the site and existing land remains in an environmentally sound condition for reuse. In this event the TCM, Sam Roud, would inform the EA of Synergy's intentions and officially request a permit surrender application whereby the requested information and fees will be supplied to ensure a timely application completion. Only when the site is confirmed to be de-registered with the EA will Synergy take vacate the land fully. In order to ensure that the environment is preserved, the site will be compartmentalised as follows:

1. Drivers will cease to collect waste
2. Ongoing Waste processing will be completed so that all waste is ready for off-take
3. Quarantined Waste will be prioritised for offtake and disposal
4. Followed by hazardous waste
5. Followed by non-hazardous waste
6. Followed by owned goods
7. Followed by operational machinery and infrastructure
8. The last Synergy Assets to be removed will be security and perimeter features to best maintain site security and prevent third party fly-tying or squatting.

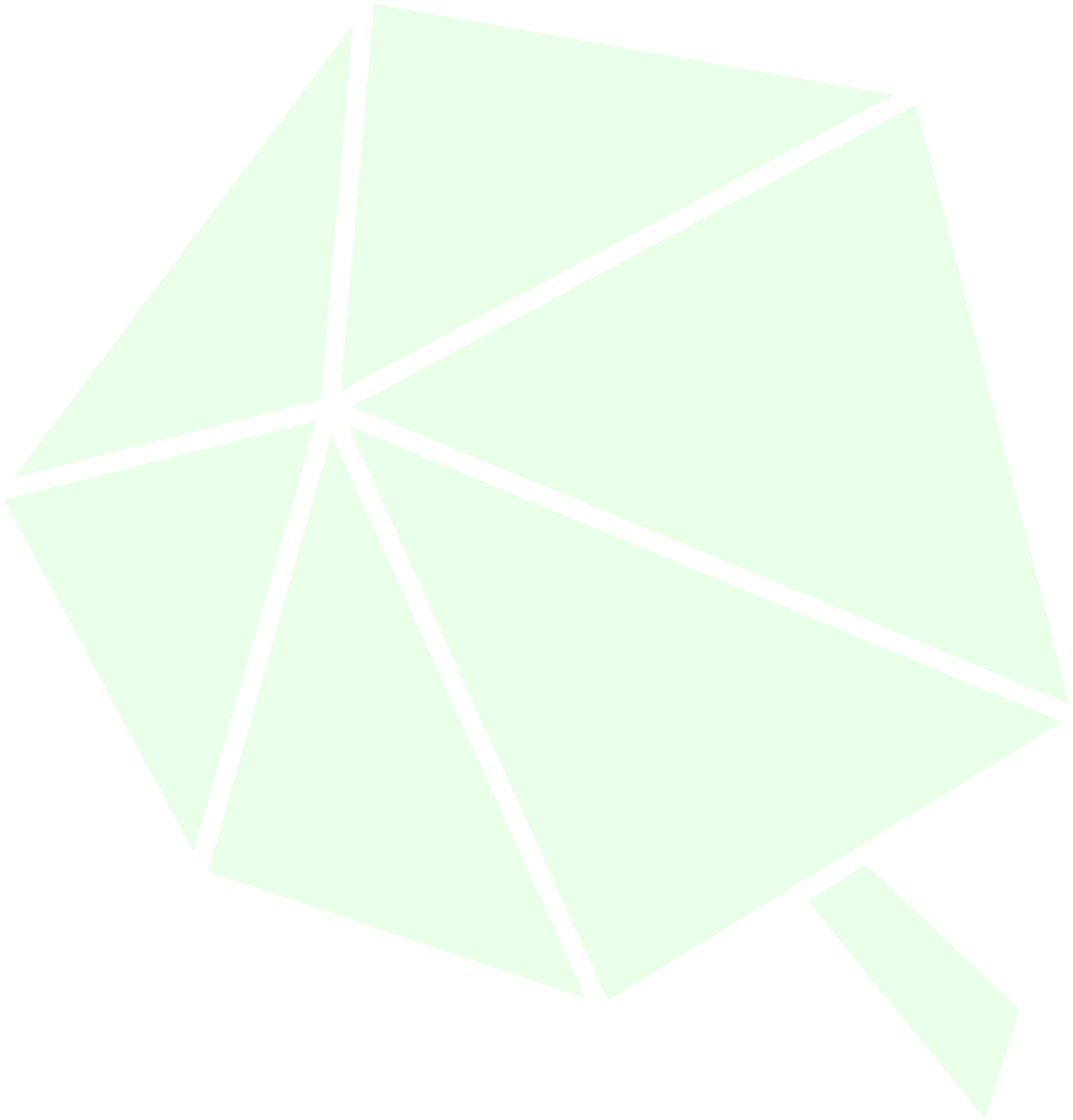
23 AVAILABILITY OF ENVIRONMENTAL MANAGEMENT SYSTEM

All site staff and visitors will have access to the EMS when it is applicable to them to ensure compliance and consistent operation of the site.

A copy of the EMS will be available in the main site office for reference purposes and at the request of regulators.



24 APPENDICES



Appendix 1 Site Diary



Date	Day	Weather	Wind Dir	Wind Spd
Daily site inspections				
Condition of parameter fencing		Condition of plant machinery		
litter not outside of parameter fencing		Waste inspection carried out		
Site free from windblown litter and debris		Safety and fire equipment available		
Condition of site surfaces		Condition of site lighting		
Condition of bunded storage area		Site free from pests & vermin		
Condition of drainage system		Odour emissions at acceptable level		
Drainage system free from blockages		Waste storage area not exceeding maximum capacity		
Site clean from spills		Plant defect sheets complete		
Waste in designated storage areas		No free-flowing liquids entering drains or watercourses		
No Unauthorised waste on site		Accident report book available		
Condition of waste storage containers		First aid equipment available		
Notes/Details of any non-compliance, site defects or waste activities				

I acknowledge that I am entering a site that contains pressurised gas cylinders and I am entering at my own risk. I am in possession of the following Personal Protection Equipment which will be worn whilst on site. High visibility clothing, Protective footwear, Hard hat and Gloves

A Banksman system is in operation on this site. You should not drive a vehicle on to the property until instructed by our Banksman, and you should obey all directions given by them.

If you observe a fire, you should notify a member of staff and evacuate the premises immediately. The evacuation point is by the main entrance to the farm.

Synergy Recycling considers safety to be of the highest priority and operates a system of notification of unsafe practices. If you see anything you consider to be unsafe, please advise a member of staff immediately and provide details below. This form can also be used to advise us of any suggestions you may have on ways we can improve our working practices. For safety reasons, please notify the office upon leaving the premises.

Name	Company	Time in	Time out	Reasons for visit	Signed

Site Diary Completed By	Position	Signed

Appendix 2 Spill Procedure

Spillage Procedure

In the event of a spillage of fuel/oil from site machinery or vehicles, the following procedures will be implemented:

- Clear the area straight away.
- Lay absorbent granules over the spill to soak up the spillage.
- Use Personal Protective Equipment (PPE) provided on site if required.
- Once the liquid has all been absorbed use a shovel to clear up the waste, put it in a plastic sack and then place it in the container for non-compliant waste for disposal at a suitably permitted facility; and
- A record of the spill incident and remedial action taken will be recorded in the Site Diary.

Spillage kits are maintained on site in order to respond to any spillage incident. The spillage kits are kept securely in a designated area as highlighted on the site map.

Appendix 3 House Keeping Checklist

Site:		Date		
Floors & Walkways				
Are all walkways kept clear?	Yes	No	N/A	Observations
Is the floor free from tripping hazards?				
Are all cables and hoses suitably stored?				
Are all awkward items being stored safely so as not to cause a hazard to pedestrians or vehicles?				
Is all uneven flooring clearly identified?				
Is there a program in place for replacing uneven flooring?				
Are unsafe areas cordoned off?				
Spillages-liquids				
Are wet surfaces covered with non slip materials?				
If necessary are non slip safety shoes provided?				
Are floors cleaned regularly?				
Storage of waste				
Are there suitable skips/containers to handle the different waste products produced on the site?				
Are they regularly emptied?				
Are they able to receive waste now?				
Storage-general				
Are materials and equipment stored in such a way that sharp objects don't interfere with walkways?				
Are tools and equipment stored correctly (shadow boards)?				
Are workbenches free of clutter?				
Are COSHH substances stored securely and tidily?				
Is lifting equipment stored tidily?				
Poor weather				
Are drains clear of blockages?				
Is salt or grit available for clearing ice and snow?				
Lighting				
Is the work area suitably lit?				
Falls				

Are all edges protected?				
Are all ladders secured?				
Offices				
Is the office(s) clean, tidy and free of loose carpet tiles and spillages?				
Are cables tidy?				
Are there suitable arrangements for the storage and collection of waste?				
Are windows cleaned on a periodic basis?				

Appendix 4 Permit to Work



W/C :

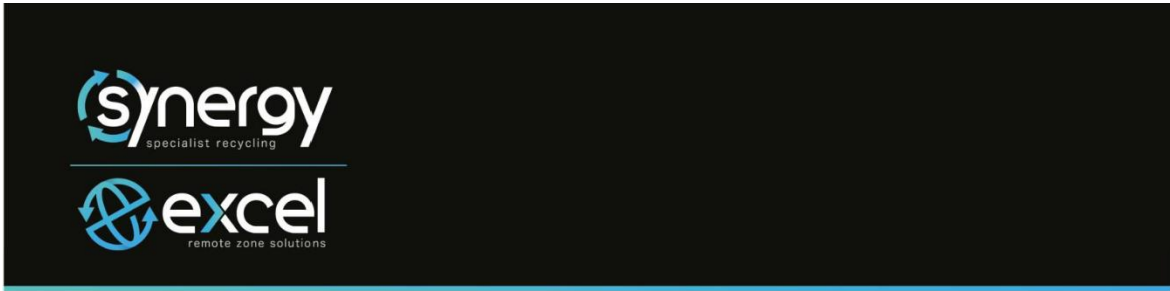
HOT WORK PERMIT



NAME & DESCRIPTION OF HOT WORKS		MON START		TUE START		WED START		THU START		FRI START	
		SIGNED									
		SUPERVISOR									
CHECKS		SITE	OFFICE	SITE	OFFICE	SITE	OFFICE	SITE	OFFICE	SITE	OFFICE
Hot work must cease at least one hour before end of shift. Areas where hot works have been carried out											
Services affected must be isolated before work commences.											
Isolate smoke detectors in the vicinity of hot works.											
A suitable fire extinguisher must be available and be kept close at hand, at all times.											
Supervisors must ensure suitable personal protective equipment (PPE) is provided and worn by operatives.											
All cylinders must be transported and secured upright.											
Valves and hoses must be in good condition.											
All cylinders must have flashback arrestors fitted.											
When not in use, cylinders must be shut off and returned to store.											
LPG cylinders must not be left in the building overnight without formal approval.											
Arc welding equipment will comply with current standards.											
Spent welding rods must be immersed in a bucket of water.											
Minimum radius of hot work must be 2 m from other persons working. Screens should be erected											
Where hot works are required adjacent to combustible material, a fireproof protective mat should be placed between the material and the heat source during the hot works											
Work areas to be kept tidy and free from combustible materials.											
Operatives must remain in the area for 15 minutes after completing work to ensure there is no hot-spot											
		MON END		TUE END		WED END		THU END		FRI END	
		SIGNED									
		SUPERVISOR									



Appendix 5 Training Record



Terry Clatworthy | Compliance Manager | 1st October 2023



Synergy Recycling is the trading name of Synergy Asset Services Limited
Company Reg: 04264601 | VAT: 787043701
Synergy Asset Services Ltd T/A Synergy Recycling
Merton Farm, Merton Lane South, Canterbury, Kent - CT4 7BA

01227 462008

email@synrec.co.uk
www.synergy-recycling.co.uk



Training record

Name of company: Synergy Name of employee: _____

Name of supervisor: _____

Instructions to supervisor

The employee and supervisor should sign each area of training listed below as it is completed. The manager responsible should endorse the record and ensure that a copy is retained on file.

The employee with access to all policies and procedures risk assessments and method statements during the on boarding process and any time at work.

Task	Date completed
General responsibilities	
Accident reporting and recording	
Health and welfare	
Personal protective equipment	
Handling Fire extinguishers	
Dust and fumes (Respiratory hazards)	
Noise and vibration	
Hazardous substances	
Identify all items that you can handle	
Hazardous Sign's	
Degassing Fire extinguishers	
Dismantling Fire extinguishers	
Site rules	
Drugs and alcohol	
Manual handling	
Safety signs	
Fire prevention and control	
Electrical safety	
Work equipment and hand-held tools	
Mobile work equipment	
Lifting operations and equipment	
Working at height	
Confined spaces	
Environmental awareness and waste control	
Cylinder handing	
Manual handling	
Environmental awareness and waste control	



I have successfully completed all the training above on all policy and procedures and techniques within Synergy.

I have verified that the employee is adhering to the established standards and has successfully passed the assessment, demonstrating their capability to work within Synergy on the date.....

Appendix 6 Training Checklist

Full Name	Level 3	ADR	Asbestos	Audacity to	Bankman	CCSHH	Counterbalance	CPR Awareness	Driver	Driving at Work	DSE Display	Environmental	Environmental	Fire	Fire Marshal	Fire Safety	Forklift 31 up	Forklift	Hand-Arm	Health and	Ladder course	Ladders And	Lateness and	Legionella and	Lone working	Manual	Personal	Powder Room	Respiratory	Risk	Rough Terrain	Short term	sorting bay	Stress in the	Wet: room CO2	Wet Rooms	Wet room	Work Related	Working at		
Barry Hernandez	Completed	Completed	Pending	Completed	Completed	Completed	Completed	Completed	Completed	Pending	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	
Anthony Mikenas	Completed	Completed	Pending	Completed	Completed	Completed	Completed	Completed	Completed	Pending	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed
Andrew Driver	Completed	Completed	Pending	Completed	Completed	Completed	Completed	Completed	Completed	Pending	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed



Appendix 7 Maintenance Schedule

Hydropayne

Plant	sheet	Hours	Last service
Hydrovane	No 223516	36742	11/03/2023

location	Ser No	Model	Make	Type	Date of this inspection
1		Nitrous Oxide Piercing Unit	B.c.h		
2		FE Piercing Unit			
3		Crushing Unit			
5		FE Powder Vacuum Units			
6		Horizontal Band Saw			
7		Scrap Metal Elevator			
8		Forklift trucks			
9		Drills			
10		Pallet trucks			
11		Various Handheld Tools			
12					
tool shed	ISO/IEC 80974-1	Xtm 201 DI	parweld	welder	
		Abrasive wheels			
tool shed	N251905500	I CUT 100	R-tech	plasma cutter	
tool shed	N257905284	I CUT 100	R-tech	plasma cutter	
jacks room	N159907245	I CUT 100	R-tech	plasma cutter	
Processing room	4677 06 01 001340 J2020		milwaukee	grinder	
Tool shed spare 001	4811 85 01 001195 C2023	M18 FSAG115XB	milwaukee	grinder	

location	serial no	make	type	Jan	Feb	Mar	Apr	May	Jun	Jul	Agu	Sep	Oct	Nov	Dec
Processing room	44	Milwaukee	Radio												
Processing room	45	Milwaukee	Radio												
Processing room	46	Milwaukee	m12 6 ah battery												
Processing room	47	Milwaukee	m12 6 ah battery												
Processing room	48	Milwaukee	4.5 inch grinder												
Processing room	49	Milwaukee	m18 5 ah battery												
Processing room	50	Milwaukee	m18 5 ah battery												
Processing room	51	Milwaukee	Charger												
Processing room	52	Un branded	Balloon crusher												
Processing room	53	B.C.H.	Nos machine												
Processing room	54	Un branded	Crusher unit												
Processing room	55	Fiac	Compressor												
Processing room	56	Crocodile saw	Band saw												
			Name												
			Sign												

Location	Serial no	Make	Type	Jan	Feb	Mar	Apr	May	Jun	July	Agu	Sep	Oct	Nov	Dec
Wet room	57	Dewalt	4 ah 18v battery												
Wet room	58	Dewalt	4 ah 18v battery												
Wet room	59	Dewalt	4 ah 18v battery												
Wet room	60	Milwaukee	M18 5 ah battery												
Wet room	61	Milwaukee	M18 5 ah battery												
Wet room	62	Milwaukee	M18 5 ah battery												
Wet room	63	Milwaukee	Charger												
Wet room	64	Milwaukee	Charger												
Wet room	65	Dewalt	Charger												
Wet room	66	Dewalt	Radio												
Wet room	67	Milwaukee	4.5 inch grinder												
Wet room	68	Milwaukee	4.5 inch grinder												
			Name												
			Sign												

Locaton	Serial no	Make	Type	Jan	Feb	Mar	Apr	May	Jun	Jul	Agu	Sep	Oct	Nov	Dec
Powder room	70	Hydrovane	Compressor												
Powder room	71	Powder vac	Hoover												
Powder room	72	Powder vac	Hoover												
Powder room	73	Un branded	Peircing unit												
Powder room	74	Un branded	110v transformeer												
Powder room	75	Makita	4.5 inch grinder												
Powder room	76	Makita	4.5 inch grinder												
Powder room	77	Milwaukee	Imapct driver												
Powder room	78	Milwaukee	M18 battery 5 ah												
Powder room	79	De wait	Chop saw												
Powder room	80	Milwaukee	Radio												
Powder room	81	Titan	Wet and dry vac												
			Name												
			Sign												

Appendix 8 Plant Defect Check List

W/C :

PLANT DEFECT CHECKLIST



LADDER 1	MON	TUE	WED	THU	FRI
STILES					
Not cracked, split, twisted, dented or bent					
No splinters or sharp edges					
Free from over wear					
Free from grease, paint etc.					
Feet present and in good order					
RUNGS AND TREADS					
All present, none missing					
Not cracked, split, twisted, dented or bent					
No splinters or sharp edges					
Free from over wear, oil, grease etc.					
No loose					
LADDER FITTINGS					
All intact and fuctional					
Free from corrosion					
Tie rods secure					
Distortion free					
Stabilising bars in step ladders lock correctly					
ROOF HATCH					
Latches					
Hinges					
Chain					
Locking Arm					

LADDER 1	MON	TUE	WED	THU	FRI
STILES					
Not cracked, split, twisted, dented or bent					
No splinters or sharp edges					
Free from over wear					
Free from grease, paint etc.					
Feet present and in good order					
RUNGS AND TREADS					
All present, none missing					
Not cracked, split, twisted, dented or bent					
No splinters or sharp edges					
Free from over wear, oil, grease etc.					
No loose					
LADDER FITTINGS					
All intact and fuctional					
Free from corrosion					
Tie rods secure					
Distortion free					
Stabilising bars in step ladders lock correctly					
ROOF HATCH					
Latches					
Hinges					
Chain					
Locking Arm					

* DETAILS OF DEFECT FOUND:

W/C :

PLANT DEFECT CHECKLIST



LADDER 1	MON	TUE	WED	THU	FRI
STILES					
Not cracked, split, twisted, dented or bent					
No splinters or sharp edges					
Free from over wear					
Free from grease, paint etc.					
Feet present and in good order					
RUNGS AND TREADS					
All present, none missing					
Not cracked, split, twisted, dented or bent					
No splinters or sharp edges					
Free from over wear, oil, grease etc.					
No loose					
LADDER FITTINGS					
All intact and fuctional					
Free from corrosion					
Tie rods secure					
Distortion free					
Stabilising bars in step ladders lock correctly					
ROOF HATCH					
Latches					
Hinges					
Chain					
Locking Arm					

* DETAILS OF DEFECT FOUND:

Appendix 9 Climate Change Risk Assessment

Risk is the probability of an individual being exposed to an work place hazard and the impact of such exposure. The Primary risk is assessed with no mitigation in place such as managerial procedures and Personal Protective Equipment (PPE).

Probability

Probability of exposure
HIGH – exposure is probable: direct exposure likely with no / few barriers between hazard, source and receptor.
MEDIUM – exposure is fairly probable: feasible exposure possible, barriers to exposure less controllable.
LOW – exposure is unlikely: several barriers exist between hazards source and receptors to mitigate against exposure.
VERY LOW – exposure is very unlikely; effective, multiple barriers in place to mitigate against exposure.

Consequence

Consequences of Exposure
HIGH – the consequences are severe: sufficient evidence that short or long term exposure may result in serious damage.
MEDIUM – consequences are significant; sufficient evidence that exposure to hazard may result in damage that is not severe in nature and reversible once exposure ceases (e.g. irritant).
LOW – consequences are minor; damage not apparent though reversible adverse changes may occur.
VERY LOW – consequences are negligible; no evidence of adverse changes following exposure.

Risk Matrix

		Consequences			
		Very Low	Low	Medium	High
Likelihood	High	Low	Medium	High	High
	Medium	Low	Medium	Medium	High
	Low	Low	Low	Medium	Medium
	Very Low	Very Low	Low	Low	Low

For all hazards identified either procedures or PPE have been developed. Residual risk will remain and are detailed in the tables below.

	Impacts	Risk Level (Likelihood X Consequence= Risk)			Mitigation Consideration	Retained Risk
Summer daily maximum temperature This may be around 7°C higher compared to average summer temperatures now.	Impact 1 Potential for increased waste reactions or fires involving heat sensitive or combustible waste. The mitigation for this could include making sure:	L	M	M	<ul style="list-style-type: none"> • Stored in shaded buildings and or containers • Waste fire extinguishers used as alternate measures fire break. • Staff monitor waste via visual inspections, out of hours CCTV and smoke sensors. 	L
	Impact 2 Potential for fire if the temperature exceeds the heat rating of components in electrical equipment or components are subjected to intense and direct sunlight.	L	L	L	<ul style="list-style-type: none"> • Processing equipment and electrics internal and shaded. 	Very Low
	Impact 3	L	M	M	<ul style="list-style-type: none"> • All processing within a building and shaded. 	L

	Impacts	Risk Level (Likelihood X Consequence= Risk)			Mitigation Consideration	Retained Risk
	Potential increase in high temperature expansion and stress of plant, pipework and fittings.				<ul style="list-style-type: none"> Regular inspection of equipment and site infrastructure Regular maintenance of plant. 	
	<p>Impact 4</p> <p>Potential increased dust emissions from processing areas and site roads.</p>	L	M	M	<ul style="list-style-type: none"> Regular housekeeping of site Waste not expected to be dusty. 	L
	<p>Impact 5</p> <p>Long periods of hot and dry weather could lead to a drought and may have an impact on water supplies for:</p> <ul style="list-style-type: none"> emergency water usage cooling systems fire fighting 	L	L	L	<ul style="list-style-type: none"> No water used in process Stored water on site for fire fighting Machinery shaded to prevent over heating. 	L

	Impacts	Risk Level (Likelihood X Consequence= Risk)			Mitigation Consideration	Retained Risk
	<ul style="list-style-type: none"> processes that require water as input for example aggregate and soil washing plants 					
	<p>Impact 6</p> <p>Potential increased risk of pests and scavengers from stockpiled waste such as food and drink containers, food contaminated wastes and 'black bag' type wastes.</p>	L	L	L	<ul style="list-style-type: none"> Type of wastes not accepted. 	L
	<p>Impact 7</p> <p>Potential increased risk of wildfires impacting the site.</p>	L	L	L	<ul style="list-style-type: none"> Vegetation if any managed around site via regular cut backs as and when required. 	L
<p>Winter daily maximum temperature</p> <p>This could be 4°C more than the current average with the potential</p>	<p>Impact 1</p> <p>Slightly higher winter maximums could generate regular odour complaints and pest infestations.</p>	L	L	L	<ul style="list-style-type: none"> Waste stream is not known to cause odour complaints. 	L

	Impacts	Risk Level (Likelihood X Consequence= Risk)			Mitigation Consideration	Retained Risk
for more extreme temperatures, both warmer and colder than present					<ul style="list-style-type: none"> No odourous waste accepted under waste acceptance procedure. 	
	<p>Impact 2</p> <p>Lower winter temperatures could result in an increased risk of pipes (or similar) freezing.</p> <p>The mitigation for this could be regular inspection and preventative maintenance of site, plant and equipment</p>	L	L	L	<ul style="list-style-type: none"> Regular inspection of equipment and site infrastructure Regular maintenance of plant. 	L
Daily extreme rainfall Daily rainfall intensity could increase by up to 20% on today's values.	<p>Impact 1</p> <p>Potential for increased site surface water and flooding.</p>	L	L	L	<ul style="list-style-type: none"> Not located in a flood zone. Ensure that site drainage is designed to account for climate change uplifts in peak rainfall intensity, according to Environment 	L

	Impacts	Risk Level (Likelihood X Consequence= Risk)			Mitigation Consideration	Retained Risk
		L	M	M		
					Agency guidance, to avoid surface water flooding.	
	<p>Impact 2</p> <p>There is potential for drainage systems and interceptors to be overwhelmed.</p>	L	M	M	<ul style="list-style-type: none"> Drainage systems are inspected and maintained 	L
<p>Average winter rainfall</p> <p>Average winter rainfall may increase by over 40% on today's averages.</p>	<p>Impact 1</p> <p>Potential for increased site surface water and flooding</p>	L	M	M	<ul style="list-style-type: none"> Drainage systems are inspected and maintained 	L
	<p>Impact 2</p> <p>Potential for drainage systems and interceptors to be overwhelmed.</p>	L	M	M	<ul style="list-style-type: none"> Drainage systems are inspected and maintained 	L
<p>Sea level rise</p> <p>Sea level rise which could be as much as 0.6m higher compared to today's level.</p>	<p>Impact 1</p> <p>If a site is located near the coast there is potential increased risk of flooding.</p>	L	M	M	<ul style="list-style-type: none"> Not located in a flood zone 	L

	Impacts	Risk Level (Likelihood X Consequence= Risk)			Mitigation Consideration	Retained Risk
<p>Drier summers</p> <p>Summers could see potentially up to 40% less rain than now</p>	<p>Impact 1</p> <p>Potential increased use and reliance on mains water for dust suppression, cleaning and fire water.</p>	L	M	M	<ul style="list-style-type: none"> Mains water is adequate Localised stored water 	L
	<p>Impact 2</p> <p>There is potential increased impact of discharge to watercourse from on-site drainage systems where connected to water courses.</p>	L	M	M	<ul style="list-style-type: none"> No discharge to a water course from the site. 	L
<p>River flow</p> <p>The flow in the watercourses could be 50% more than now at its peak, and 80% less than now at its lowest.</p>	<p>Impact 1</p> <p>Increased impact from on-site drainage systems where they are connected to watercourses.</p>	L	M	M	<ul style="list-style-type: none"> Water not abstracted from river for process. 	L
<p>Storms</p>	<p>Impact 1</p>	L	M	M	<ul style="list-style-type: none"> Ongoing review of site buildings 	L

	Impacts	Risk Level (Likelihood X Consequence= Risk)			Mitigation Consideration	Retained Risk
Storms could see a change in frequency and intensity. The unique combination of increased wind speeds, increased rainfall, and lightning during these events provides the potential for more extreme storm impacts	Potential for high winds to damage buildings and infrastructure and blow waste from the site.				<ul style="list-style-type: none"> Preventative maintenance programme for infrastructure On going house keeping 	
	Impact 2 Potential for high winds to cause problems with stability of above ground storage tanks on jacks. This poses a risk to staff, plant infrastructure and the potential to release the contents of the storage tank.	L	M	M	<ul style="list-style-type: none"> No tanks on jacks 	L
	Impact 3 Potential for lightning strikes to damage buildings and infrastructure.	L	M	M	<ul style="list-style-type: none"> Assess need to install lightening conductors. 	

<https://www.gov.uk/government/publications/adapting-to-climate-change-industry-sector-examples-for-your-risk-assessment/non-hazardous-and-inert-waste-treatment-examples-for-your-adapting-to-climate-change-risk-assessment>

Appendix 10 Technical Information Sheet 6: Cylinder Identification



PRESSURE VESSEL IDENTIFICATION LIST

LPG

(UN1011/UN1978) (If owned No EWC)

Red/Green - Propane (UN1978)

Other colours - Butane (UN1011)

Ranging in size (kg) = 3.9, 4.5, 5P, 5.5, 6, 6P, 7, 9P, 10P, 11, 11P, 13, 15, 18, 19, 47.

Only collect Calor or Calor subsidiary brands where permitted.

For an exhaustive list of all subsidiary brands and their chief ownership (usually Flogas or Calor) see the UKLPG ownership list.

If an LPG cylinder is from the UK (English markings and brandings) but does not belong to a UKLPG repatriation scheme company it is to be entered into the LPG UK Butane or Propane box within the repatriable section on the collection paperwork.

If the LPG cylinder is unidentifiable or belongs to an insolvent company no longer trading it is to be entered into the waste section under the non-repatriable LPG Butane or Propane box.

Any LPG cylinder that is of a foreign origin (identifiable by the branding and text language) is to be entered into the LPG European Butane or Propane box within the repatriable section on the collection paperwork.

Foreign LPG butane/propane are not identifiable by a colour scheme and come in various shapes, sizes, weights and brands and you will have to check the cylinder for a UN number or contents description.



Smaller Cylinders - Camping Gaz

(UN1011) (No EWC)

Comes in 3 sizes: 907 (large, left), 904 (medium, middle) and 901 (small, right).

May have fittings attached at point of collection, if so leave the fittings attached.

Identifiable by shape and blue heavy steel casing.

Not to be confused with Camping Gaz branded Canisters and Canisters + (below).



Other Cylinders - Brewery Kegs

(No UN Number) (No EWC)

Easily identifiable given their unique shape and size.

Usually empty but may have liquid contents.

Repatriable and non-gaseous so no waste paperwork or UN number required.

To be consigned as Beer Kegs under the repatriable section.



Repatriable Pressure Vessel

Non-Hazardous Waste

Category Dependant on Ownership Status

Hazardous Waste



PRESSURE VESSEL IDENTIFICATION LIST

Smaller Cylinders – Sodastream Cylinders
(UN1013) (No EWC)

These are similar in size and shape to Lecture Cylinders however they are constructed from aluminum rather than steel making them lighter in weight.

Sodastream Cylinders are almost always marked with Sodastream branding making them easy to identify. They are repatriated back to the ownership company (Sodastream) where possible and therefore are to be treated as a non-waste within the collection paperwork.



High Pressure Cylinders - Medical Oxygen
(UN1072) (No EWC)

Most medical oxygen cylinders are repatriatable and are either white composite material or a black and white steel cylinder (pictured right).

These will usually belong to BOC, Air products or Air Liquide.



High Pressure Cylinders - Brewery Cylinders
(UN1013) (No EWC)

Brewery Cylinders are technically high-pressure cylinders but are consigned separately to other high-pressure cylinders given that they are sent through a deferent repatriation route (BCGA & BFBI).

Easily identifiable by their brown/black steel casing, usually with rounded bottoms and a shroud with a brewery’s markings and product descriptions.



High Pressure Cylinders - Helium
(UN1046) (No EWC)

Identifiable by their brown colour, often coming in two types as pictured to the right. The first type is a standard high-pressure cylinder often with a brown or black shroud. The second and more common type is a recreational party helium cylinder pictured to the right with a plastic green shroud and handle. Often labeled with a brand such as Heligas.



Repatriatable Pressure Vessel
 Non-Hazardous Waste

Category Dependant on Ownership Status
 Hazardous Waste



PRESSURE VESSEL IDENTIFICATION LIST

High Pressure Cylinders – Acetylene
(UN1001) (No EWC)

Identifiable by the distinctive mauve/purple colour casing usually with white labelling as pictured to the right. They have different coloured shrouds depending on branding and are usually marked with Air Products, Air Liquide or BOC branding.

Only to be collected if ownership/branding is evident on cylinder since waste acetylene cylinders are difficult to compliantly dispose of.



High Pressure Cylinders – Argon
(UN1006) (No EWC)

Identifiable by the black or green casing with a green neck. They have different coloured shrouds depending on branding and are usually marked with Air Products, Air Liquide or BOC branding.



High Pressure Cylinders - Oxygen
(UN1072) (No EWC)

Identifiable by the black casing with a white neck, sometimes they are entirely black or white. They have different coloured shrouds depending on ownership and are usually marked with Air Products, Air Liquide or BOC branding.



High Pressure Cylinders – Nitrogen
(UN1066) (No EWC)

Identifiable by the silver, white or black casing. They have different coloured shrouds depending on branding and are usually marked with Air Products, Air Liquide or BOC branding.



Repatriatable Pressure Vessel
 Non-Hazardous Waste

Category Dependant on Ownership Status
 Hazardous Waste



PRESSURE VESSEL IDENTIFICATION LIST

Extinguishers
(UN1044) (EWC 16-05-05)

CO2 – Identifiable by aluminum casing (look for rings underneath if unsure). Also, usually black with white text colour scheme or red with black colour scheme.

Water – Usually lightweight steel casing with a red and white colour scheme.

Foam – Not to be confused with water Extinguishers since both will likely have liquid contents upon collection. Also, lightweight steel but with a red and beige colour scheme.

Powder – Usually heavyweight steel casing with a red and blue colour scheme.

Chemical – Usually red/yellow lightweight steel casing with liquid contents.



High Pressure Cylinders - Fire Suppression System/Trolley
(UN1044) (EWC 16-05-05)

The Fire Suppression Systems can look a lot like standard fire extinguishers however they are to be treated with extra care since they are usually heavier and operate at a higher pressure. Note that some fire suppression systems are fixed into a buildings infrastructure in which case you are to leave the system alone. We are only permitted to collect safely detached and decommissioned systems that have been professionally removed and made ready for collection.



Other Cylinders - Disposable Helium Balloon Cylinders
(UN1046) (EWC 15-01-04)

There are a few similarly shaped cylinders as pictured to the right. Helium Balloon Cylinders are identifiable by having a rubber "nipple" for charging balloons with a green or black plastic twist release. Usually very light weight and pink or white/cream. They come in two sizes as pictured right.

These are usually found in an open-to-atmosphere state at the point of collection since they have been used for their intended purpose by the previous user. Even though likely empty, these cylinders are treated as pressurised with regard to transport and applying a UN number.



Smaller Cylinders - Charge Capsules
(UN1013/UN1070) (EWC 15-01-04)

Contents are usually Nitros Oxide (N2O) or Carbon Dioxide (CO2).

These are usually found in an open-to-atmosphere state at the point of collection since they have been used for their intended purpose by the previous user. Even though likely empty, these cylinders are treated as pressurised with regard to transport and applying a UN number.



Repatriatable Pressure Vessel
 Non-Hazardous Waste

Category Dependant on Ownership Status
 Hazardous Waste



PRESSURE VESSEL IDENTIFICATION LIST

Other Cylinders – Refrigerants

(UN1078) (If Waste EWC 16-05-05) (If owned No EWC)

Refrigerants come in different cylinder types. Some are in an LPG style cylinder and can be identified by their dual twist valves (usually coloured red and blue) and are either grey and blue or grey and yellow.

Other refrigerants look similar to disposable helium balloon cylinders but are usually blue or green in colour and will be marked with text indicating that it is a refrigerant.

Some refrigerants are owned and repatriable and can be identified with branding such as BOC, Linde etc. and are to be entered under the Refrigerant box in the repatriable section. Any that are non-repatriable are to be consigned as Non-repat Refrigerants UN1078 with the above waste code.

Please note: Yellow top refrigerants are to be consigned as Hazardous, refer to hazardous section of guide for further details.



Smaller Cylinders - Calibration Cylinders

(UN1956) (EWC 16-05-05)

Contents vary from cylinder to cylinder.

Usually, a collection of Calibration Cylinders will be arranged with prior descriptions of the cylinders provided including their contents for an accurate description.

If an accurate contents description is not available and there are no indications on the cylinder that the contents are flammable or with any other hazardous properties, the cylinder is to be entered as Calibration Cylinders UN1956 Compressed Gas N.O.S. which is to be written in the notes/other section of the paperwork.



Smaller Cylinders - Life Raft Inflators

(UN1013) (EWC 15-01-04)

These are heavier and larger than Charge Capsules and usually feature a threaded neck as opposed to a puncture disk release system.

These are usually found in an open-to-atmosphere state at the point of collection since they have been used for their intended purpose by the previous user. For this reason, they are usually non-gaseous and can therefore be processed as such upon unloading/sorting to then be processed into component parts. Any that are discovered to be pressurised are segregated at the point of unloading/sorting to be compliantly sent for onward disposal. Even though likely empty, these cylinders are treated as pressurised with regard to transport and applying a UN number.



Repatriable Pressure Vessel

Non-Hazardous Waste

Category Dependant on Ownership Status

Hazardous Waste



PRESSURE VESSEL IDENTIFICATION LIST

Smaller Cylinders - Canisters
(UN1011/UN1978) (EWC 16-05-04*)

Usually, lightweight aluminum with propane or butane contents. Most Canisters are used for camping stoves etc and are marked as such.

Not to be confused with Aerosols, both are similar however they are listed under different UN numbers.



Smaller Cylinders - Canisters +
(UN1011/UN1978) (EWC 16-05-04*)

The same as regular Canisters however they have attachments fitted.

Attachments are not to be removed since this may lead to a release of gas. Instead, they are consigned as regular Canisters but are separated at the point of unloading/sorting to be stored in separate IBC lanes for separate disposal routes.

To be entered in the Canisters box within the collection paperwork alongside regular Canisters.



Smaller Cylinders – Aerosols
(UN1950) (EWC 16-05-04*)

Usually have aluminum lightweight casing and include deodorants, air fresheners, hair spray, spray paint etc.

Not to be confused with Canisters which have a similar appearance however they are consigned under different UN numbers.

Aerosols are to be entered manually within the notes/other section on the collection paperwork.



Smaller Cylinders - MAP/Rothenberger
(UN1978) (EWC 16-05-04*)

The same as regular Canisters however they have a harder casing and a uniform shape as pictured to the right.

Consigned as regular Canisters but are separated at the point of unloading/sorting to be stored in separate IBC lanes for separate disposal routes.



Repatriatable Pressure Vessel
 Non-Hazardous Waste

Category Dependant on Ownership Status
 Hazardous Waste



PRESSURE VESSEL IDENTIFICATION LIST

Smaller Cylinders - Hard Case Canisters
(UN1013/UN1006) (EWC 16-05-04*)

Usually used for welding purposes and is often CO2 or a CO2 Argon mix. Despite some not possessing any hazardous properties, they are all to be treated as Canisters with regard to the collection paperwork.

A similar size and shape to larger regular Canisters but with a thick heavy steel casing therefore requiring them to be segregated at the point of unloading/sorting to then be stored within a separate IBC lane for onward disposal.



Extinguishers - Halon
(UN1974) (EWC 16-05-04*)

Halon is usually smaller than other Fire Extinguishers. Identifiable by green lightweight casing or green markings on a red background.

Please ensure that Halon Extinguishers are properly segregated from other Extinguishers within the collection paperwork since they have different UN numbers and EWC statuses.



Other Cylinders - LPG Autotanks
(UN1978) (EWC 16-05-04*)

Autotanks are very distinguishable and come in two shapes, round/doughnut shaped or long tubular shaped. They are always black or rusted and contain LPG Propane.

To be entered in the notes/other section of the paperwork.



Other Cylinders - Froth Packs
(UN1950) (EWC 16-05-04*)

Froth Packs can easily be mistaken for disposable helium balloon cylinders given their cream colouring and similar shape. To differentiate between the two, Froth Packs have thinner handles, no rubber "nipple" and usually have labelling and marking indicating that they are froth packs.

To be entered in the notes/other section of the paperwork.



Repatriatable Pressure Vessel

Non-Hazardous Waste

Category Dependant on Ownership Status

Hazardous Waste



PRESSURE VESSEL IDENTIFICATION LIST

Smaller Cylinders - Spray Adhesives

(UN1950) (EWC 16-05-04*)

Usually have aluminum lightweight casing and propelle adhesive substances such as glue and can also hold expanding foam for building purposes.

Sometimes attached with nossels which are to be left attached.

Spray Adhesives are to be entered manually within the notes/other section on the collection paperwork.



Other Cylinders – Refrigerants

(UN1078) (If Waste EWC 16-05-04*) (If owned No EWC)

Refrigerants come in different cylinder types. Some are in an LPG style cylinder and can be identified by their dual twist valves (usually coloured red and blue) and are either grey and blue or grey and yellow.

Hazardous refrigerants are identified by their yellow top and/or their UN hazard marking.

Some refrigerants are owned and repatriatable and can be identified with branding such as BOC, Linde etc. and are to be entered under the Refrigerant box in the repatriatable section. Any that are non-repatriatable are to be consigned as Non-repat Refrigerants UN1078 with the above waste code.



Smaller Cylinders (Lecture Cylinders)

(Various UN Numbers) (EWC 16-05-04*)

Contents vary from cylinder to cylinder.

Usually, a collection of lecture cylinders will be arranged with prior descriptions of the cylinders provided including their contents for an accurate description.

An accurate description must be provided prior to the collection since the contents can vary amongst a wide scope of different hazards and properties rendering them as inappropriate for some mixed loads.

To be entered in the notes/other section of the paperwork.



Smaller Cylinders - Calibration Cylinders

(UN1954) (EWC 16-05-04*)

Contents vary from cylinder to cylinder.

Usually, a collection of Calibration Cylinders will be arranged with prior descriptions of the cylinders provided including their contents for an accurate description.

If an accurate contents description is not available, check the cylinder for a UN number and/or a hazard diamond. If flammable, the cylinder is to be entered as Calibration Cylinders UN1954 Compressed Gas N.O.S, Flammable which is to be written in the notes/other section of the paperwork. If non-flammable, please see non-hazardous section.



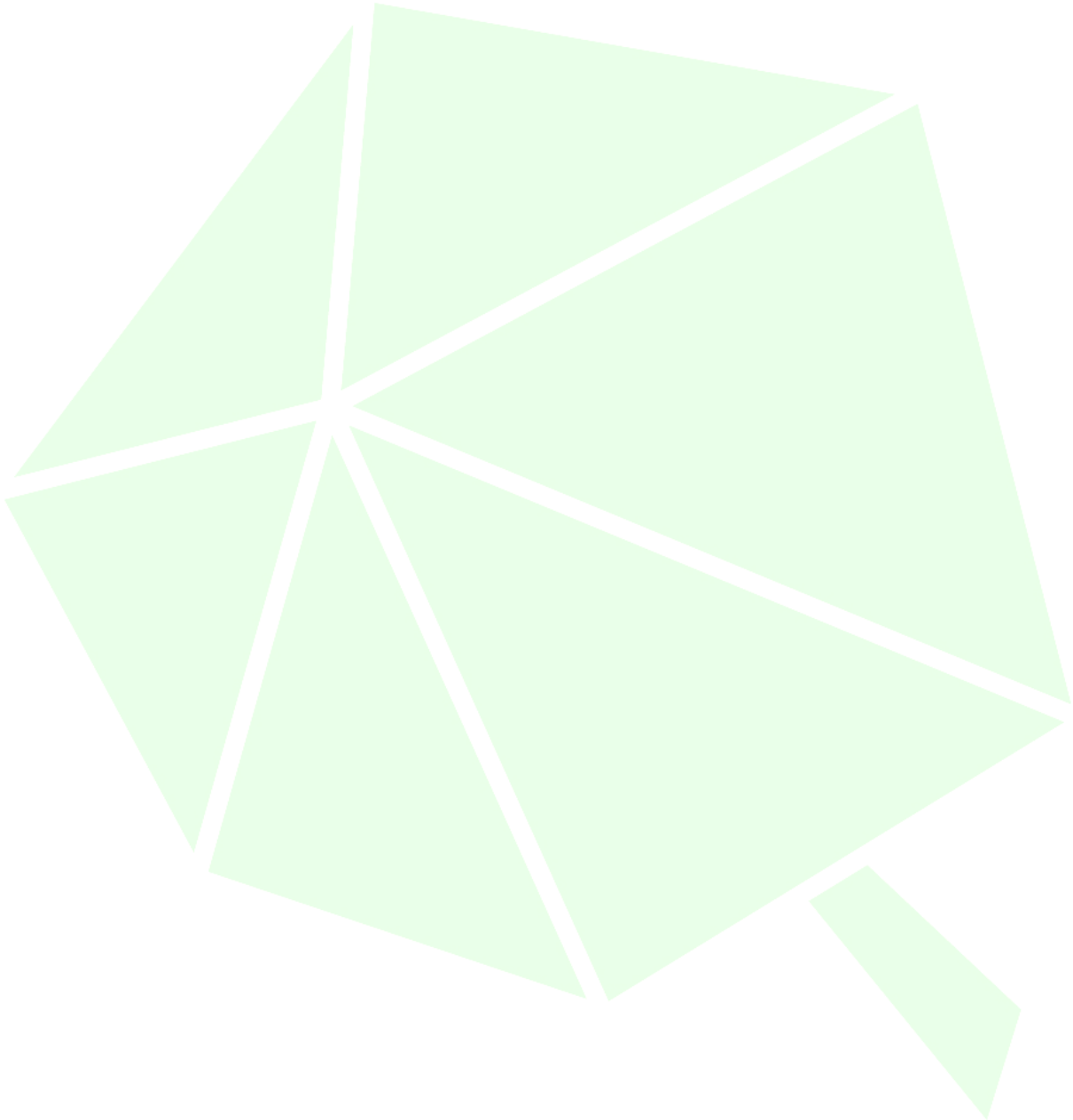
Repatriatable Pressure Vessel

Non-Hazardous Waste

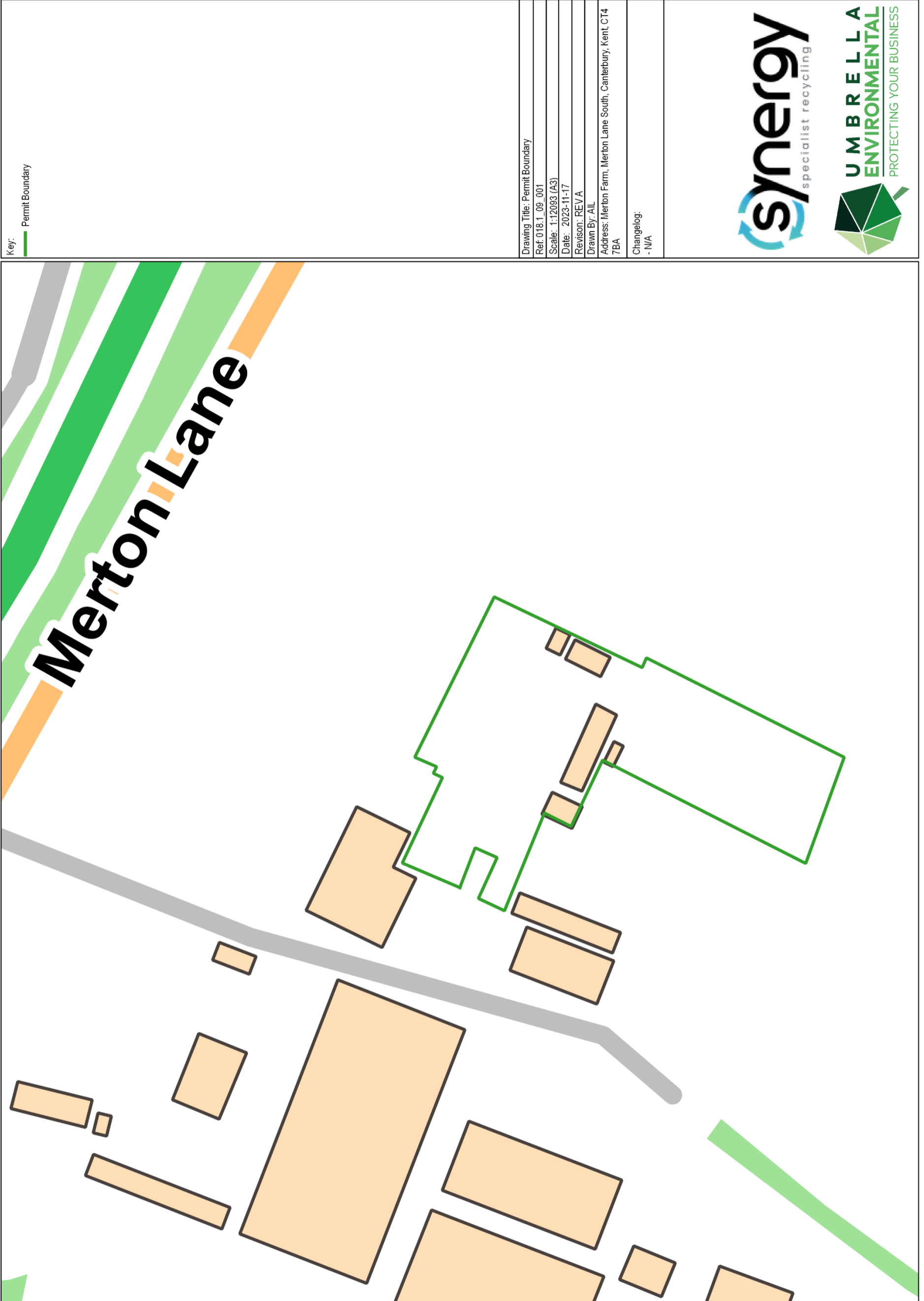
Category Dependant on Ownership Status

Hazardous Waste

25 DRAWINGS



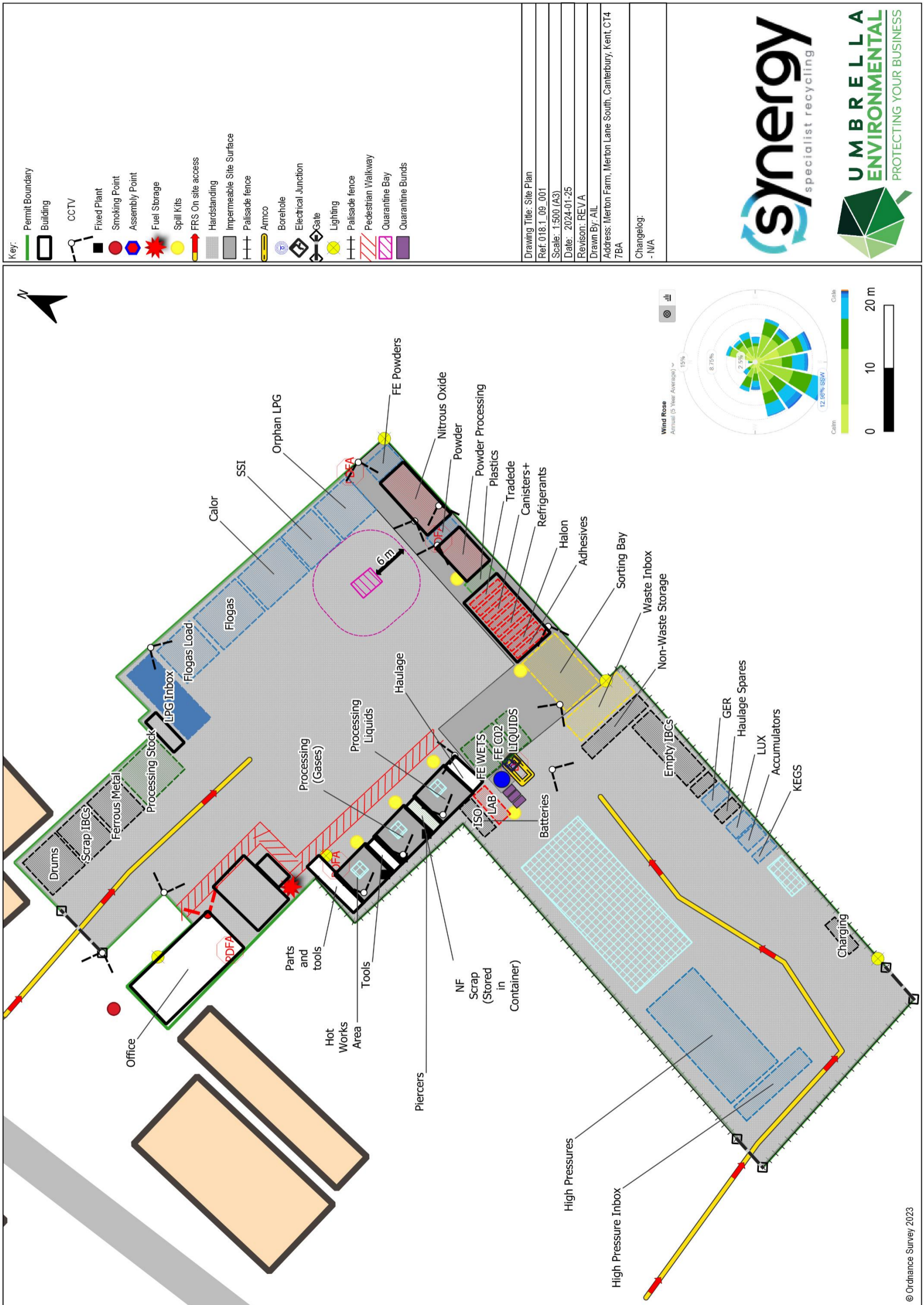
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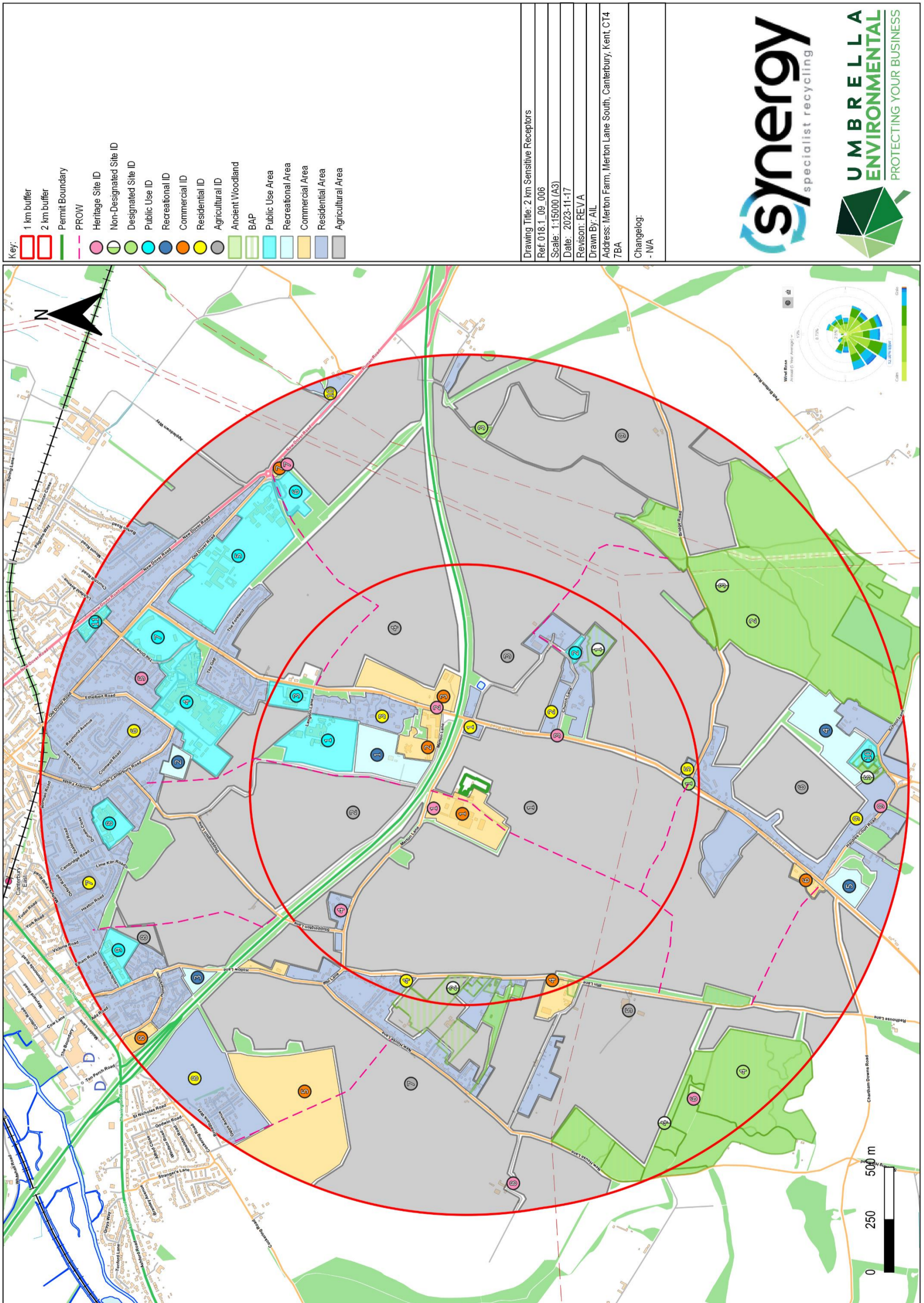
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— Permit Boundary

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Ref: 018.1_09_001
Scale: 1:12093 (A3)
Date: 2023-11-17
Revised: REVA
Drawn By: AIL
Address: Merton Farm, Merton Lane South, Canterbury, Kent, CT4 7BA
Change log: - N/A

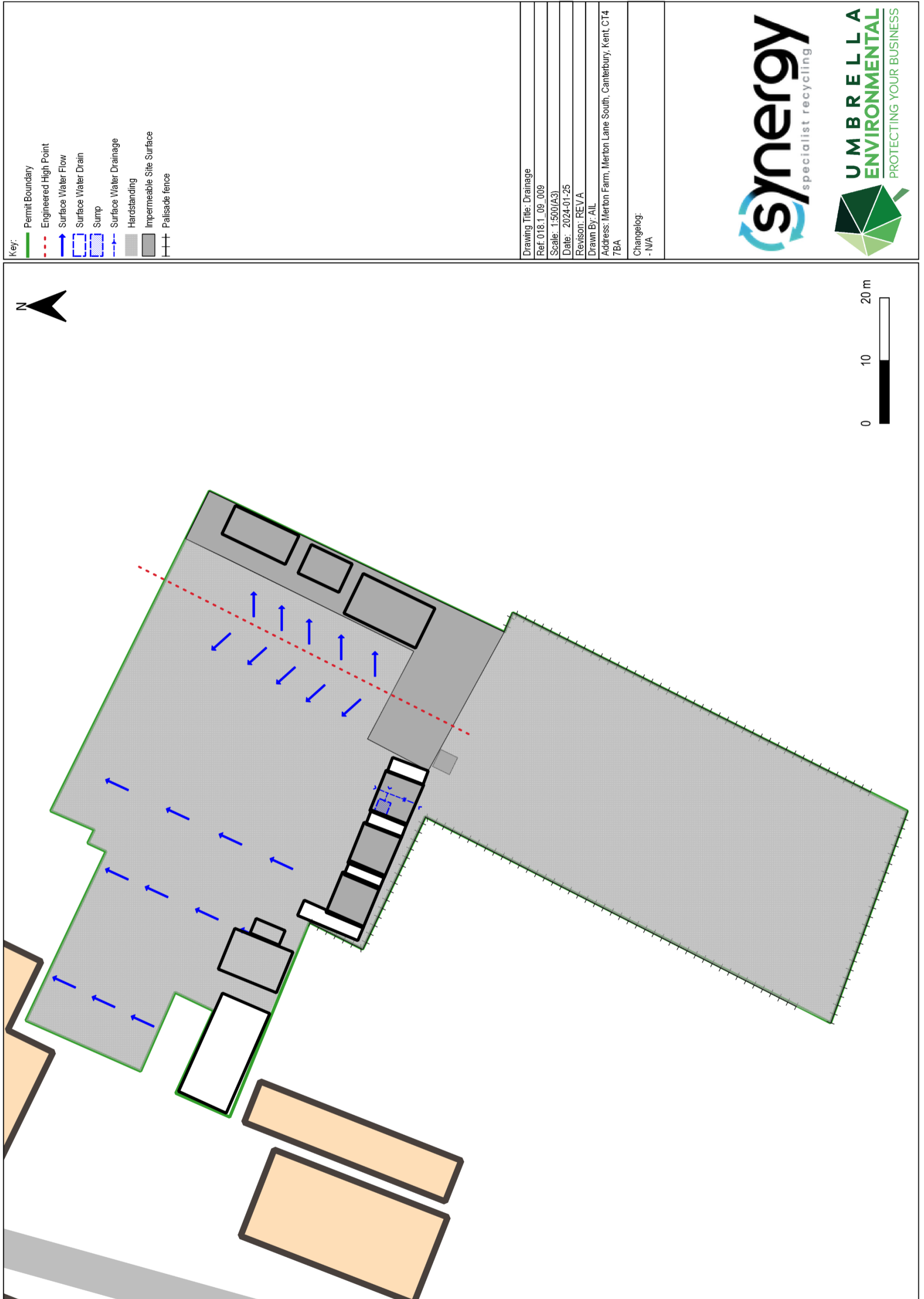




Drawing 3 018.1_09_006 1 km Sensitive Receptors



Drawing 4 018.1_09_009 Drainage Plan



Drawing 5 FIRE ALARM - RCC AREAS

Rev	Ch-ID	Description	Date
P0			27/11/23

General Note
 1. Do not scale off this drawing. Refer to E-mapped dimensions only.
 2. This drawing is provided solely for the purpose of illustrating the layout of the alarm systems. Any view of the building shown is for illustrative purposes only, and may differ from the building's actual construction.

ORANGE LINE REPRESENTS RCC BOUNDARIES



Client
 SYNERGY RECYCLING

Site
 MERTON FARM, MERTON LANE,
 SOUTH CANTERBURY, KENT,
 CT14 7BA
Drawing Title
 FIRE ALARM - RCC AREAS

Scale
 1:180@A1
Checked by
 CC

Drawing Status
 FOR CONSTRUCTION
Date
 27/11/23

Drawing Number
 ALS-124-01-100
Revision
 P0

Allsaved Head Office
 Unit 3, Billingshurst Trade Park, Stone Street
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 www.allsaveduk.com 01798 812989

LEGEND		
SYMBOL	DESCRIPTION	Qty
	FIRE ALARM PANEL	1
	RADIO CLUSTER COMMUNICATOR	6
	RADIO HUB CONTROL PANEL	1





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