Client: Clearfield Envirotech Limited

Address: Mc1, Road Five, Winsford Industrial Estate, Winsford, Cheshire, CW7 3RB

Clearfield Envirotech Limited Mc1, Road Five, Winsford Industrial Estate, Winsford, Cheshire, CW7 3RB



ENVIRONMENTAL MANAGEMENT SYSTEM

03 September 2023

Our Reference: Clearfield-Winsford-RP02-Final (EMS)



	07748 363 125
\bowtie	info@wasteandindustry.co.uk
♣	www.wasteandindustry.co.uk

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Waste and Industry Compliance Limited 20 Walton Grange, Stafford Road, Stone, Staffordshire, ST15 0ET

Telephone 07748 363 125 info@wasteandindustry.co.uk

CONTENTS

1	INTRODUCTION5						
	1.1 Background	6 7					
2	PURPOSE OF ENVIRONMENTAL MANAGEMENT SYSTEM						
3	CONTROL OF EMS						
4	WASTE ACCEPTANCE						
	 4.1 Waste Types and Quantities	9					
5	WASTE STORAGE	10					
6	WASTE TREATMENT	11					
	 6.1 Waste Shredding 6.2 Wash Plant 6.3 Wash Water Recirculation 6.4 Extruders 6.5 Product Storage 	11 12 12					
7	SITE DRAINAGE	12					
8	SITE RECORDS	13					
9	MAINTENANCE	14					
10	ENVIRONMENTAL ACCIDENTS AND INCIDENTS	14					
11	EMISSIONS	17					
	11.1 Environmental Risk Assessment	17 18 18 18 19					
12	SITE CLOSURE	20					
	12.1 Background						
13	CONTINGENCY MEASURES	21					
14	CLIMATE CHANGE	22					
15	TRAINING	23					
16	SITE DIARY	23					
17	COMPLAINTS	23					
	17.1 Procedures in the Event of a Complaint						

	17.3 Timescales	
18	REVIEW AND AUDIT2	25

APPENDICES

Appendix 1 Refuelling and Emergency Spillage Procedure

Appendix 2 Record of non-conformance

Appendix 3 General Waste Management

Appendix 4 Complaints Record

Appendix 5 Preventative Maintenance Checklist

Appendix 6 Maintenance Record

Appendix 7 Inspection Record

Appendix 8 Environmental Accident and Incident Record

Appendix 9 Training Record

Appendix 10 Training Needs Checklist

DRAWINGS

Drawing No. 5989-HJCE-00-XX-DR-D-3001 MC1, Drainage Layout 1:250@A1

Drawing No. DW01 Indicative Site Layout and Storage

Drawing No. DW02 Sensitive Receptors

1 INTRODUCTION

1.1 BACKGROUND

- 1.1.1 This Environmental Management System (EMS) has been prepared for a proposed non-hazardous waste plastic and carboard recycling facility at Mc1, Road Five, Winsford Industrial Estate, Winsford, Cheshire, CW7 3RB *(the Site)*. It is submitted in support of an application for a bespoke Environmental Permit for the Site.
- 1.1.2 Clearfield Envirotech Limited *(the Operator)* will operate the facility to treat a range of non-hazardous plastic and cardboard wastes for recovery and recycling. All waste streams are accepted for the purpose of recycling and recovery. No wastes are received for the specific reason of treating them for disposal.
- 1.1.3 Using state of the art washing and separation technology, the plant is designed to achieve high rates of recycling, typically 70% or greater. It will recycle many non-hazardous plastics that are typically either landfilled or incinerated, thereby moving these materials up the waste hierarchy and making a significant contribution to recycling targets. The Site will have an annual waste throughput of up to 100,000 tonnes. Hazardous wastes will not be accepted at the Site.
- 1.1.4 The Site incorporates a dedicated and enclosed building, of brick and steel portal frame construction, which incorporates a fully sealed impermeable concrete base. There are no drainage outlets inside the building and therefore no pathways to groundwater, surface water or uncontained land. All waste treatment activities will take place inside the building. Processing equipment will comprise shredding equipment, up to two wash plants, which each incorporate rear end mechanical drying, up to two plastic extrusion plants and a baler for baling recycled products prior to off-site supply to customers. There will be no waste storage inside the building.
- 1.1.5 The building is fitted with 4 roller shutter vehicular access doors on the northern side and 5 roller shutter doors on the southern side. Pedestrian access fire doors are also fitted for emergency evacuation, e.g. in the event of a fire incident.
- 1.1.6 All incoming wastes will be baled and stored on the external yard, which incorporates engineered, paved surface. A combination of open stockpiles with a minimum of 6m separation distances all around (i.e. to all four sides) and fireproof bays comprising 2 hour fire resistant concrete rear push walls and side walls will be used for the storage of baled waste. Where fire resistant bays are used, a 6m separation distance will be maintained in front of the bay and the maximum height of waste will be at least 1m lower than the top of the bay walls.
- 1.1.7 The Site will operate on a 24 hours x 7 days basis. There will be no waste deliveries or recycled product collections between the hours of 7.00pm and 7.00am. During this time period, the doors to the building will be kept closed, including the roller shutter vehicular access door (except in the event of an emergency, such as a fire) and all activities will take place inside. The building will be staffed throughout the operational period.
- 1.1.8 The proposed permit boundary, site layout and storage areas are shown on Drawing 'Indicative Site Layout and Storage-DW01'.
- 1.1.9 This EMS has been prepared in accordance with the latest Environment Agency guidance 'Develop a

- management system: environmental permits' https://www.gov.uk/guidance/develop-a-management-system-environmental-permits.
- 1.1.10 A detailed Fire Prevention Plan (FPP) has been prepared to support the permit application, see Clearfield-Winsford-RP03-Final (FPP). The FPP has been prepared in accordance with the Environment Agency's Fire Prevention Plan (FPP) Guidance, which was most recently updated on 11 January 2021, see https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits.
- 1.1.11 A Technically Competent Person, with suitable WAMITAB qualification (or EPOC qualification for an initial period of up to 12 months), will supervise operations at the Site. A Certificate of Continuing Competence is required every 2 years after initial issue of the WAMITAB Certificate or whatever appropriate requirements are prevalent at the time.
- 1.1.12 Any fuels or oils stored on Site will be kept in dedicated containers located within the building or in suitable tanks. Any tanks used for the storage of potentially polluting liquids will be either double skinned or located in an impermeable bunded area, with a capacity of at least 110% of the largest tank's contents.
- 1.1.13 No substances that would be classified as 'dangerous' under the Control of Major Accident Hazards (COMAH) Regulations will be used at the Site for the operation of the facility.
- 1.1.14 The Site is secured by a combination of palisade, steel mesh and chain link fencing topped with barb wire. Lockable security gates are installed at the Site entrances. CCTV cameras will be installed for added security, both inside the building and on the external yard to provide continuous cover of the entire site.

1.2 THE SITE

- 1.2.1 The Site is located on the Winsford Industrial Estate and is surrounded on all four sides by large industrial buildings. It is accessed off Road Five, which connects onto Road One that in turn leads onto the A54 'Middlewich Road'. The nearest residential properties are circa 540m west of the Site at the closest point. There is a railway line circa 525m west of the Site, which runs from Crewe to Runcorn and beyond, and serves Winsford Railway Station. The River Weaver is located circa 1,765m west of the Site at the closest point. The River Dane is circa 1,600m east of the Site, beyond which is the Trent and Mersey Canal, circa 1,755m to the east of the Site.
- 1.2.2 Winsford Industrial Estate is a large complex of industrial buildings and units extending circa 1.6km in a north south axis and circa 700m in an east west axis. The nearest non-industrial estate land to the Site are areas of farmland and woodland, circa 165m and 170m east of the Site.
- 1.2.3 The Site is not located within an Air Quality Management Area (AQMA) or within 2km of an AQMA.
- 1.2.4 A review of Defra's Magic Map (https://magic.defra.gov.uk/MagicMap.aspx) shows that there are three European Site designations within a 10km radius of the Site. West Midlands Mosses Special Area of Conservation (SAC) is located circa 7,175m west northwest of the Site at the closest point. It is also designated as Midland Meres and Mosses Phase 2 RAMSAR Site. Oak Mere SAC is circa 9,220m west of the Site at the Closest Point.
- 1.2.5 There are no European Sites (i.e. Special Protection Areas (SPA), SACs or RAMSAR Sites), Sites of

- Special Scientific Interest (SSSIs), National Nature Reserves (NNR) or Local Nature Reserves (LNR) within 2km of the Site.
- 1.2.6 The nearest area of Priority Habitat is a belt of Deciduous Woodland located circa 250m north northeast of the Site. There are further areas of Priority Deciduous Woodland circa 570m and 730m northeast of the Site at the closest points. There is an area of Ancient Woodland circa 935m southeast of the Site.
- 1.2.7 There is a Scheduled Monument, Bostock Hall moated site, circa 580m northeast of the Site. There are no other Scheduled Monuments or any Registered Battlefield within 2km of the Site.
- 1.2.8 Sensitive receptors are shown on Drawing 'Sensitive Receptors'-DW02.

1.3 OPERATIONAL HOURS

- 1.3.1 It is proposed to operate the Site on a 24 hours, 7 days basis.
- 1.3.2 Waste processing operations will take place throughout this period. However, between the hours of 7.00pm and 7.00am there will be no waste deliveries or collections of recycled products. The doors to the building will remain closed throughout this period and all activities will be internal to the building. The processing plant is not inherently noisy and the enclosed fabric of the building will provide noise attenuation. Between the hours of 7.00am and 7.00pm, the vehicular access roller shutter door will be kept closed other than when vehicles are entering and exiting the building.

1.4 METEOROLOGICAL CONDITIONS

1.4.1 Meteorological Office predictions and recordings of local weather data (https://www.metoffice.gov.uk/weather/forecast/gcqnwewjx#?date=2023-07-19) will be reviewed by the Site Manager or other Technically Competent Person to allow forward planning and information gathering on the direction that smoke would travel from the Site in the event of a fire incident. Daily observations of weather conditions, including wind speed, direction and temperature, will be made so that site operations can be rearranged to adapt to changing conditions where necessary.

2 PURPOSE OF ENVIRONMENTAL MANAGEMENT SYSTEM

2.1.1 This EMS includes details of how the Site will be managed to minimise the risks of pollution from operations, maintenance, accidents, incidents and any non-conformances. It provides a framework through which the environmental performance of the Operator will be controlled, monitored and improved.

3 CONTROL OF EMS

- 3.1.1 The Site Manager will have overall responsibility for the EMS. The Technically Competent Person will ensure the EMS is kept up to date, that it is complied with and that its requirements are disseminated to staff, e.g. through toolbox talks.
- 3.1.2 Copies of the Environmental Permit, EMS and FPP will be kept in the Site office. Staff and contractors will be made aware of their location and availability.

4 WASTE ACCEPTANCE

4.1 WASTE TYPES AND QUANTITIES

- 4.1.1 The maximum waste throughput at the Site will be 100,000 tonnes per annum. Up to 3,200 tonnes will be stored on Site at any one time. The Site operates on a first in first out basis to ensure that wastes are received, processed and dispatched as quickly as possible. The maximum storage time of wastes on site will be 4 weeks, although typically materials will be processed, baled and dispatched from the Site within 2 weeks of receipt.
- 4.1.2 Proposed permitted wastes are listed in Table 1 below.

Table 1 Permitted Wastes

ECW Code	Description
02 01	Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 04	Waste plastics
03 03	Wastes from pulp, paper and cardboard production and processing
03 03 07	Mechanically separated rejects from pulping of waste paper and cardboard
03 03 08	Wastes from sorting of paper and cardboard destined for recycling
07 02	Wastes from the MFSU of plastics, synthetic rubber and man-made fibres
07 02 13	Waste plastic
12 01	Wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01 05	Plastics shavings and turnings
15 01	Packaging (including separately collected municipal packaging waste)
15 01 01	Paper and cardboard packaging
15 01 02	Plastic packaging
15 01 05	Composite packaging
15 01 06	Mixed packaging
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 09	Plastic
17 02	Wood, glass and plastic
17 02 03	Plastic
19 12	Wastes from the mechanical treatment of wastes (e.g. sorting, crushing, compacting, pelletising) not otherwise specified
19 12 01	Paper and cardboard
19 12 04	Plastic and rubber
19 12 12	Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in in 19 12 11 (limited to dry recyclables only)
20 01	Separately collected fractions (except 15 01)
20 01 01	Paper and cardboard
20 01 39	Plastics

4.2 WASTE ACCEPTANCE PROCEDURES

- 4.2.1 Waste pre-acceptance procedures will ensure that only compliant waste types are accepted. Customers delivering waste to the Site will be required to provide the Operator, in advance, with all necessary information/documentation to satisfy the requirements of the Duty of Care and the Waste (England and Wales) Regulations 2011 (see below).
- 4.2.2 The Operator will check pre-acceptance documentation from suppliers and waste testing results to ensure that only permitted waste streams are approved for delivery to the Site. Non-permitted wastes or other unsuitable wastes will not be accepted. Pre-acceptance documentation will record:
 - The waste description;
 - The European Waste Classification (EWC) code;
 - The source and nature of the waste, including its physical form;
 - Any special handling measures;
 - Any potential risks to process safety, occupational safety and the environment;
 - Details of the waste producer (name, address and contact details);
 - Where the waste holder is not the producer, details of the waste holder (name, address and contact details);
 - Information on the nature and variability of the waste production process and the waste;
 - Age of the waste;
 - Type of packaging;
 - An estimate of the quantity to be received in each load and in a year.
- 4.2.3 Checks will also be made to establish whether the haulier is a Registered Waste Carrier or has a valid exemption from registration. Only registered carriers or those who are lawfully exempt from registration will be permitted to use the Site.
- 4.2.4 Waste will not be accepted if for any reason there is insufficient storage capacity available or if the Site is inadequately manned. This is to ensure that all waste is managed effectively to prevent pollution or loss of amenity.
- 4.2.5 Site staff will be suitably trained and will follow documented procedures. The Operator will examine the waste descriptions of incoming waste loads and the information will be checked against the previously supplied pre-acceptance documentation, six figure European Waste Catalogue Code(s) and other details on the Waste Transfer Note or season ticket (as appropriate) and against the waste types permitted by the Environmental Permit.
- 4.2.6 Every delivery of waste will be recorded, detailing the date of the transaction, weight, waste type, registered carrier, Waste Transfer Note number, vehicle registration and other pertinent information against a unique reference number. It will allow for tracking of wastes, the generation of reports and waste returns, as well as providing comprehensive, auditable information.

- 4.2.7 A banksman will instruct waste delivery drivers to the appropriate part of the Site for off-loading to ensure wastes are stored and processed correctly. This will help to ensure the cleanliness of recyclable materials is maintained and that wastes are processed on a first in first out basis.
- 4.2.8 A visual inspection of the contents of all waste loads, including those received in sheeted containers and enclosed trailers, will be made during deposit.
- 4.2.9 Any discrepancies found as a result of the checks detailed above will result in the vehicle being detained whilst some, or all, of the following supplementary management decisions are taken:
 - Referral to a Technically Competent Person (TCP) on site;
 - Referral to the waste producer to confirm the nature of the waste load;
 - Referral to the waste carrier's base;
 - Referral to the Environment Agency;
 - Redirection of delivery vehicle off site, to a suitably authorised facility; and
 - If the waste has been discharged on the floor of a bay or stockpile area, removal of the waste to a secure quarantine skip or container, prior to off-site removal either to the waste producer or suitably authorised facility.

4.3 NON-CONFORMING WASTE

- 4.3.1 Any loads arriving at the Site which contain non-permitted wastes or a significant amount of contrary material shall be rejected prior to unloading. In the unlikely event that a vehicle inadvertently deposits non-permitted waste or a large amount of contrary material, it will be re-loaded where possible. Where the vehicle has already left the Site, the non-permitted waste or contrary material will be stored in a quarantine skip or container at the Site, pending removal of the material to the waste producer or authorised facility. Any waste materials dispatched off site to an authorised facility, will be removed in accordance with the Duty of Care. A Registered Waste Carrier will be used.
- 4.3.2 Material rejected from the Site shall be issued with a record stating why, when and from which contract the waste was provided. This record shall be held on Site for the Environment Agency to inspect. In addition, the 'Record of Non-Conformance', Appendix 2, shall be completed and the record will be held on Site.
- 4.3.3 Small amounts of contrary material present in loads shall be removed by hand or machine and temporarily stored in the quarantine skip or area. Material in quarantine shall be removed from Site to a suitably permitted facility, capable of dealing with the waste types.

5 WASTE STORAGE

5.1.1 Wastes accepted at the Site (after passing waste pre-acceptance and acceptance procedures) will be stored on the external yard using a combination of fireproof concrete bays (with a 6m separation distance at the front of the bay) and open stockpiles (surrounded by a 6m separation distance to all 4 sides of the stockpile). Individual stacked bale sizes will not exceed 12m x 10.5m x 3.4m high (i.e. 428.4m³). Storage bay locations and separation distances are shown on Drawing 'Indicative Site Layout and Storage', DW01.

- 5.1.2 Bales will be circa 0.85m thick and stored up to 4 high, i.e. to a maximum height of 3.4m. Where bales are stacked inside fireproof concrete bays, the height of the bay wall will be 4.4m, thereby maintaining a 1m high headroom above the waste.
- 5.1.3 Stock rotation will ensure that bales and stockpiles are filled and emptied in sequence, therefore ensuring that wastes are always processed on a first in first out basis (i.e. bays and stockpiles containing the longest deposited materials will be emptied first). In this way each bay and stockpile will be emptied completely, as a minimum every fortnight. Once empty, bays and stockpiles will be thoroughly swept, including the corners, to ensure all wastes and debris are removed and the potential for wastes and dusts to accumulate over time is prevented.
- 5.1.4 A banksman will ensure that incoming waste delivery vehicles are directed to the appropriate wastes storage bays and stockpiles. The vehicle will reverse up to the storage area, where they will be unloaded and the bales stacked by fork lift or grab in the appropriate bay or stockpile.
- 5.1.5 The Site Manager or other Technically Competent Person will inspect waste storage as part of the daily checks to ensure materials are being suitably stored within the confines of the bays and stockpiles (i.e. the waste is not located beyond the front of the bay or stockpile, the 6m separation distance is maintained and, where fireproof bays are used, the 1m high headroom is being maintained.

6 WASTE TREATMENT

6.1 WASTE SHREDDING

6.1.1 Baled wastes will be transferred from the storage bays and stockpiles to the waste processing plant located in the building. Bales will be split and fed to the shredding plant, which incorporates an infeed conveyor to an enclosed hopper with suction point to control dust emissions. A fill level sensor is installed to enable automatic feed. Material is transferred from the hopper to the cutting unit within the shredder, where material is shredded to a size of circa 80 to 110mm. Shredded materials are then transferred along the line to the wash plant.

6.2 WASH PLANT

- 6.2.1 Shredded materials are transferred from the shredding plant to a pre-wash unit, which consists of 3 chambers:
 - The first chamber serves to remove the largest fraction of contraries. Water injection causes an upward movement of the light fraction (i.e. plastics), whilst the heavier contraries fraction is discharged via a dual gate valve.
 - The second chamber is designed for intensive pre-washing of the infeed material by injecting water to the surface. The material is conveyed by two parallel screws, the screw troughs of which are designed as screens. Contraries rinsed through the screens are removed via a gate valve. The water is steadily recirculated by a pump for reuse (see Section 6.3 below).
 - The third chamber separates the remaining fines fraction of contraries. The cleaned and separated plastics fraction is transferred via discharge chute for further processing in the wash plant.

6.2.2 The separated plastics are conveyed to mechanical drying and hydrocyclone density separation of light plastic fractions such as polyethylene (PE) and polypropylene (PP) from heavier fractions such as polyethylene terephthalate (PET), polyvinyl chloride (PVC) and any remaining contraries.

6.3 WASH WATER RECIRCULATION

- 6.3.1 Used wash water will drain to a sealed collection pit where it is agitated and pumped to two connected parallel vibrating screening machines, which are used to separate and collect the residual solids fraction.
- 6.3.2 The residual solids fraction is passed through a screw press, with the sludge discharged to a sealed container for removal of-site to a suitably authorised facility. The cleaned water collects in a screened water tank, from where it is recirculated by pumping back to the wet shredder for reuse.

6.4 EXTRUDERS

- 6.4.1 Shredded, washed and dried plastics are fed to the extruder plant via a feed hopper and inclined conveyor. The extruder plant incorporates a preconditioning unit, where any remaining large plastic film sections are cut and the feed material heated and dried. This removes residual moisture from the plastic and continuously fills the extruder with heated, pre-compacted material.
- 6.4.2 Preconditioned and heated material is fed to a first stage filtration unit, which removes impurities to minimise out-gas emissions or unpleasant odour.
- 6.4.3 Degassing is undertaken in three stages:
 - Initial degassing occurs in the preconditioning unit;
 - Reverse extruder degassing;
 - Double venting degassing in the extruder, which removes any remaining gas inclusions which are still present from the melt.
- 6.4.4 Degassed plastic melt is pumped through the extruder to a second stage filtration unit to further enhance the quality of final products. A rotating screw arrangement in the barrel of the extruder forces the low viscosity plastics through a die attached to end of the extruder. Following exit from the extruder die, materials are passed to an automated cutter, which cuts the melted polymer into balls. The material is then cooled and bagged for export off site as a raw material plastic product for reuse.

6.5 PRODUCT STORAGE

6.5.1 As part of the daily checks, the Site Manager or other Technically Competent Person will ensure products are being suitable bagged and stored within the building, from where they will be removed by lorry to customers.

7 SITE DRAINAGE

7.1.1 The building incorporates an engineered concrete base, with no internal drainage outlets. Therefore there are no discharges from the waste treatment and product storage areas inside the building to

surface water, groundwater or foul sewer.

- 7.1.2 External yard drainage has been designed by an independent civil and structural engineering consultancy to ensure that clean surface water run-off discharges to sewer via Kingpan Klargester Class 1 Bypass Interceptors. Drawing No 5989-HJCE-00-XX-DR-D-3001 shows the site drainage.
- 7.1.3 The perimeter of the Site is kerbed with the exception of the site entrances off the public highway, i.e. Road Five. The Fire Prevention Plan measures include the construction of a 100mm 'sleeping policeman' type bunds across vehicular and pedestrian entrances to the Site to retain firewater within the external yard area in the event of a fire incident. The Site dimensions are a minimum of 125m x 95m. Therefore the 100mm (0.1m) high 'sleeping policeman' bunds across entry and exit points creates a 'reservoir' of 1187.50m³ (125m x 95m x 0.1m), which is sufficient to contain any inadvertent escape of liquid from the wash plant and/or firewater in the event of a fire incident.
- 7.1.4 An engineered quarantine area will be constructed on the external yard area, under the southern canopy of the Site, towards the south west corner, see Drawing 'Indicative Site Layout and Storage'-DW01. It will comprise a suitably sized, concrete pad and kept clear of materials at all times, except for emergency use during a fire incident (e.g. to move fire affected waste into to ensure that it is fully extinguished) or for the receipt of unburnt waste for isolation and to prevent it catching fire, see Clearfield-Winsford-FPP-RP03-Final (FPP). In the event of a fire incident, any liquors that collect in the kerbed area will be tankered off site to an authorised wastewater treatment works.
- 7.1.5 Foul water from the Site's offices and welfare facilities is discharged to foul sewer in accordance with a Trade Effluent Discharge Consent.

8 SITE RECORDS

- 8.1.1 The Site records will be maintained and kept secure from loss, damage and deterioration in either the Site office or at a secure location off-site.
- 8.1.2 Records including waste delivery dates, waste types, quantities, sources/facility and Registered Waste Carrier details of all waste entering and leaving the Site will be recorded on the 'General Waste Management', Appendix 3 and Waste Returns will be produced in a timely manner.
- 8.1.3 Other records include:
 - Weekly site inspections by the Site Manager and Technically Competent Person;
 - Completed Complaint Reporting forms (including mitigation measures);
 - Environmental accidents and incidents;
 - Non Conformance Register;
 - Maintenance records;
 - Environmental monitoring records;
 - Training records.
- 8.1.4 A copy of the Environmental Permit will be easily accessible by staff members or contractors. Contractors will be briefed on the sensitivity of the Site.

9 MAINTENANCE

- 9.1.1 All equipment and infrastructure on Site will be inspected, serviced and maintained as per manufacturer guidance and the 'Preventative Maintenance Checklist', refer to Appendix 5.
- 9.1.2 The Environment Agency will be informed without delay if there is any malfunction, breakdown or failure of equipment or techniques, accident, or fugitive emission which has caused, is causing or may cause significant pollution and cause any significant adverse environmental and health effects.
- 9.1.3 Any required maintenance will be carried out as soon as is practicable to ensure continued running of the Site and be recorded on the 'Maintenance Record', refer to Appendix 6.
- 9.1.4 Daily visual inspections for litter and mud accumulating on Site or beyond the Site boundary will be undertaken. More thorough weekly inspections will be carried out and recorded on the 'Inspection Record', Appendix 7. The weekly inspections include a review of:
 - Site access road;
 - Concrete pad (both within the building and the external yard area);
 - Fireproof bay walls and stockpiles;
 - Waste and product storage areas. Where bays are used, compliance with 1m high freeboard above the waste, front face of materials within the confines of the bay and 6m separation distance in front of the bay. Where open stockpiles are used, maintenance of 6m separation distances to all four sides;
 - General site cleanliness and sweeping of storage bays and stockpiles (including corners) and other operational areas;
 - Plant and equipment;
 - Site drainage;
 - Fire prevention and control system;
 - Litter;
 - Odour;
 - Dust;
 - Mud / dirt;
 - Pests, vermin, insects and scavenging birds;
 - Security.

10 ENVIRONMENTAL ACCIDENTS AND INCIDENTS

- 10.1.1 In the event of an environmental accident on site the 'Environmental Accident and Incident Record', refer to Appendix 8, will be completed.
- 10.1.2 The Site Manager has overall responsibility for the prevention of environmental accidents and

incidents at the Site. All staff have individual responsibility for ensuring that their actions do not cause environmental accidents and for reporting any incidents that they become aware of in the Environmental Accident and Incident Record as a priority matter. Accidents must be reported to the Site Manager or, in his/her absence, other Technically Competent Person, who will coordinate response measures to ensure the safety of staff, visitors and local people is not compromised and that the environment and local amenity is protected.

- 10.1.3 A detailed environmental aspects register is in place at the Site, which addresses all potential accident scenarios. It includes control measures to prevent or minimise the risk of the accident occurring, which is the primary objective of the register. The Site Manager is responsible for implementation of the environmental aspects register and each employee is responsible for understanding and following the procedures contained therein. Staff training is provided (see Section 15).
- 10.1.4 Emergency response measures are in place in the event that an environmental accident does occur. The Site Manager has overall responsibility for implementation of the emergency response measures that will be used to protect people and the environment in the event of an environmental accident or incident.
- 10.1.5 Emergency response measures includes:
 - Potential emergency situations;
 - Training of emergency response staff;
 - Post-emergency activities;
 - Personnel roles, lines of authority, training and communication;
 - Emergency recognition and prevention;
 - Safe distance and places of refuge;
 - Evacuation routes and procedures;
 - Emergency medical treatment and first aid;
 - Emergency alerting and response procedures;
 - Personal protective equipment and emergency equipment;
 - Preventing the escape of potentially polluting substances to the foul and surface water sewer, adjoining land or atmosphere.
- 10.1.6 The emergency response procedures are planned and will be periodically tested (at least once per year). The results will be reported in an annual management review.
- 10.1.7 Any diesel, oils or other potentially polluting liquids used on Site will be stored in suitable, sealed containers located within the building (which is fully sealed). In the event that dedicated tanks are used, they will either be self-bunded or surrounded by impermeable bunds (base and side walls) with a minimum capacity of 110% of the tank's contents. Where more than one tank is located in a bund, the capacity of the bund will be 110% of the largest tank or 25% of the total storage capacity, whichever is the greater. Bund bases and sides will be impermeable. Vents, sight glasses and

- pipework etc will be located within the bunded area. Tanks and bunds subject to regular weekly inspection by the Site Manager or other Technically Competent Person.
- 10.1.8 Refuelling and emergency spillage procedures are detailed in Appendix 1 of this EMS. Absorbent material is kept on site and is used to treat any spillage that may arise. Used absorbent and any contaminated materials etc will be removed and stored in a sealed container, prior to authorised disposal.
- 10.1.9 All processing plant and equipment, including pumps and pipework, are subject to regular visual inspection for any leaks. Maintenance is undertaken in accordance with the manufacturer's specification to ensure efficient and safe performance.
- 10.1.10 The waste processing plant will be controlled by an automated process control system. Plant equipment status conditions, waste flows, temperatures, waste levels and pressures will be presented on a Human Machine interface (HMI) display for operator information. Control, feedback and monitoring signals from around the plant will be recorded on the process control system. Safety procedures are incorporated into the design of software so that fault conditions will generate an alarm and the most appropriate safe action taken. All emergency stop push-buttons and safety interlocks will be configured to operate in a fail safe manner and will be monitored through the process control system.
- 10.1.11 A detailed FPP is in place at the Site, see Clearfield-Winsford-RP03, Final (FPP).
- 10.1.12 Emergency Fire Procedures comprise the following key points:
 - Sound an alarm on detection of any fire or smoke;
 - Evacuation of building and site offices by staff and visitors;
 - For small fires and where it is safe to do so, suitably trained staff may use fire-fighting equipment such as appropriate fire extinguishers (powder or carbon dioxide) and hoses to tackle the incident;
 - For larger fires or fires that cannot be safely extinguished by trained site staff, call the fire brigade and any other required emergency service;
 - Evacuated staff must go to a designated off-site fire assembly point;
 - Diversion of incoming materials;
 - Recovery including appropriate removal of burned waste and any residual firewater;
 - Report incident to the Environment Agency.

Table 2 Key Actions on discovering a fire

Key actions on discovering a fire

- For large fires or any fire that cannot be safely tackled on site by trained site staff, the Fire Service
 to be informed immediately of the location of the fire and the waste types involved
- All personnel must follow Emergency Fire Procedures
- Fire extinguishers and water hoses must only be used by trained fire marshals and when it is safe and appropriate to do so.
- Consider moving unburnt waste to Quarantine area if safe to do so—only trained staff to do this.

11 EMISSIONS

11.1 ENVIRONMENTAL RISK ASSESSMENT

11.1.1 An Environmental Risk Assessment has been prepared for the Site, based on the source pathway receptor principle to identify environmental risks from the Site and the mitigation measures in place to protect local people, residential properties, businesses, areas of amenity and designated habitat sites etc, see Clearfield-Winsford-RP04-Final (EnvRA).

11.2 SURFACE WATER AND GROUNDWATER

- 11.2.1 All waste processing, product storage and loading of recyclates for off-site supply to customers will take place in a fully sealed building with impermeable concrete base. There are no drainage outlets within the building to surface water, groundwater or uncontained land.
- 11.2.2 All waste off-loading and storage on the external yard area will take place on an engineered impermeable surface. Wastes will be stored in fireproof concrete bays and open stockpiles surrounded by 6m separation distances to all 4 sides. Clean surface water run-off from the external yard will drain to sewer via Class 1 Interceptors.

11.3 DUST AND PARTICULATES

- 11.3.1 All wastes will be delivered to the Site in baled form and in sheeted or enclosed lorries to minimise any fugitive emissions of dust during transfer to the facility. Similarly, products will be removed from site in sheeted or enclosed lorries.
- 11.3.2 All waste bales will be unloaded by fork lift truck or grab and paced and stacked in fireproof concrete bays or stockpiles. Bales will be stacked up to 4 high. The height of the bay walls will be a minimum of 1m higher than the top of the stacks.
- 11.3.3 Waste storage bays and stockpiles will be emptied and thoroughly swept, including the corners, as a minimum once per fortnight, to ensure all wastes and debris are removed and the potential for dusts to accumulate over time is minimised. Additional sweeping of operational areas will take place during the course of the day to ensure the facility is maintained clean and tidy at all times.
- 11.3.4 Dust netting will be installed on the perimeter security fencing in the waste storage area to minimise the risk of any inadvertent dust or litter escape from the Site. In addition, portable netting will be used and placed in close proximity to the potential source of dust or litter emission, taking care to maintain the 6m separation distance from the front of bays or to all 4 sides of an open stockpile.

- 11.3.5 All waste treatment processes will take place inside the building to control dust emissions. It is important to note that during the initial stages of waste treatment, water is added in the wash plant to clean the materials and aid the sorting and separation processes. This means that the waste treatment process is predominantly in wet form, further reducing the potential for dust emissions.
- 11.3.6 Hose reels will be installed at the Site and used to dampen the site access road, entrance, waste stockpiles and other operational areas that have the potential to give rise to dust emissions, e.g. during hot and dry weather.
- 11.3.7 A Dust and Emissions Management Plan (DEMP) has been prepared for the Site and includes a risk assessment of fugitive emissions of dust to the environment and in depth details of the control and mitigation measures in place to prevent pollution or harm, see Clearfield-Winsford-RP05-Final (DEMP).

11.4 **ODOUR**

- 11.4.1 Wastes will be delivered in sheeted or enclosed lorries to prevent the emission of odour during transport to the Site.
- Duration of waste storage times will be minimised and materials will be processed on a first in first out basis to ensure rapid turnaround times. As part of the first in first out policy, waste storage bays and stockpiles will be managed in series so that they are all emptied and swept, including the corners, typically every 4 days and, as a worst case scenario, at least once per fortnight.
- 11.4.3 All waste processing and product storage will take place inside the building. The roller shutter doors will be kept shut except during vehicle delivery, off-loading and exiting the Site, thereby minimising the potential for odour escape to the external environment.
- 11.4.4 An Odour Management Plan (OMP) has been prepared for the Site and includes an odour risk assessment and detailed control and mitigation measures to prevent odour causing nuisance or detriment to sensitive local receptors, see Clearfield-Winsford-RP06-Final (OMP).

11.5 MUD AND DEBRIS

- 11.5.1 The site entrance, access road, building floor and external operational areas of the Site comprise engineered paved surfaces. There is no requirement for lorries to drive over uncontained land at any time. Therefore the risk of mud and debris on the public highway is low.
- As part of the daily inspection regime, the Site will be visually inspected for the presence of mud and debris. Any dirty areas that have the potential to give rise to mud or debris will be swept. In the unlikely event that the adjacent industrial estate roads become muddy due to activities on site, a road sweeper will be deployed on an as and when required basis.

11.6 LITTER

11.6.1 All wastes will be delivered in baled form and in sheeted or enclosed lorries. Wastes will be off-loaded by fork lift truck or grab and stacked in fireproof concrete bays or in open stockpiles. Bales will be stacked up to 4 high. The height of bay walls will be a minimum of 1m higher than the top of the stacks, which will reduce the potential for inadvertent litter escape. In addition, dust and litter netting

will be attached to the perimeter security fencing around the external waste storage areas and portable netting will be used and placed in close proximity to the potential source of litter emission, taking care to maintain the 6m separation distance from the front of bays or to all 4 sides of an open stockpile.

11.6.2 In the unlikely event that litter escapes the Site, it will be collected and appropriately disposed of as a matter of urgency. Areas external to the Site will be kept clean and litter picked should this become necessary.

11.7 NOISE

- 11.7.1 The treatment and recycling of wastes entirely within a fully enclosed building will provide an acoustic barrier to minimise noise emissions during operation of processing equipment. Vehicular access roller shutter doors will remain closed between 7.00pm and 7.00am and will only be open outside of these hours for access and exit by waste delivery and product collection vehicles. The nearest residential property is circa 540m to the west of the Site at the closest point and is unlikely to experience noise emissions at this distance.
- 11.7.2 To further minimise noise, all vehicles, plant and machinery operated at the Site will be maintained in accordance with the manufacturer's specification. Preventative maintenance programmes will ensure appropriate lubrication, properly fitting covers, proper operation of bearing and fans and integrity of silencers, thereby minimising the noise generated by site plant. Plant and vehicles will be switched off when not in use.
- 11.7.3 Staff will be made aware that they are close to neighbouring businesses and that unnecessary noise must be minimised.

11.8 PESTS

- 11.8.1 Pest control measures include:
 - Refusing any waste loads where pre-acceptance documentation or visual inspection on arrival, shows them to be infested or likely infested with vermin, insects or other pests;
 - Immediate quarantining of any infected loads that are inadvertently received at the Site, by
 placing them in a sealed, enclosed and lidded skip or container and arranging for their
 emergency treatment by a pest control contractor and removal off site to a suitably authorised
 facility;
 - Ensuring wastes are processed on a first in first out basis typically within 4 days of receipt and, as a worst case scenario, at least once per fortnight;
 - Sweeping and disinfecting waste storage bays, stockpiles and processing areas (the regular emptying, sweeping and disinfecting of bays, stockpiles and operational areas of the Site will ensure a high standard of cleanliness and prevent wastes accumulating over a significant period of time or becoming putrescible);
 - Ensuring that waste does not accumulate in inaccessible areas such as behind push walls, pipe work or in corners;

- Daily and weekly site inspections by the Site Manager and other Technically Competent Person;
- Visits by a pest control contractor to monitor pest numbers and to apply rodenticides, insecticides etc, as required.

12 SITE CLOSURE

12.1 BACKGROUND

- 12.1.1 When waste operations eventually cease at the Site, it will be closed and decommissioned in accordance with a detailed Closure Plan to prevent pollution of the environment, harm to human health or serious detriment to local amenity. Best practice will be used to ensure that the amount of waste requiring disposal at the end of the Site's life is minimised and that infrastructure and plant is decommissioned safely and efficiently.
- 12.1.2 The building is fully enclosed and fitted with a roller shutter door, concrete base and sealed drainage. It is anticipated that the building, roller shutter door and concrete floor are likely to be suitable for alternative future commercial or industrial uses once waste operations cease and the Site is closed. However, should the Site surfaces require decommissioning, the construction materials will be recycled or recovered where practicable. Concrete fireproof bay walls on the external yard can be crushed for reuse, whilst steel and other metal materials within the building cut up and recycled off-Site. It is not anticipated that waste operations will contaminate surrounding land or groundwater due to the concrete floor and sealed drainage within.
- 12.1.3 Any hydraulic oil, engine oil, gear box oil and waste oils etc will be stored in sealed containers located in the building or in sealed tanks located within impermeable bunds. Any containers or tanks used to store potentially polluting materials will be fit for purpose and located above ground. The capacity of any bunds will be 110% of the tank's contents. Should multiple tanks be used within a single bund, the bund will be designed so that its capacity will be a minimum of either 110% of the size of the largest tank or 25% of the total capacity of all the tanks within the bund, whichever is the greater. All containers and tanks will be safely removed off site and transferred to authorised facilities for reuse or recovery. Once tanks and bunds have been decommissioned, the area of concrete will be cleaned to remove any residues or staining (the building's and external yard's engineered impermeable floors facilitate efficient cleaning).

12.2 CLOSURE PLAN

- 12.2.1 The Site will be closed and decommissioned in accordance with the Closure Plan to ensure that all works are fit for purpose, do not result in pollution or harm or serious detriment to local amenity and ensure that materials are managed in accordance with the waste hierarchy, i.e. the generation of waste will be prevented where possible or otherwise afforded the following priority: reuse at another site, recycling, recovery, disposal.
- 12.2.2 The Closure Plan will be updated during the life of the Site and prior to closure and decommissioning works commencing, to take into account legal requirements at the time and any advances in waste minimisation, recovery etc which may enable more materials to be managed higher up the waste hierarchy than currently envisaged. It will also take cognisance of any improvements in pollution prevention technology and include appropriate procedures for use to ensure that site closure and

decommissioning do not cause pollution or harm.

- 12.2.3 It is anticipated that all wastes delivered to the Site will be suitably treated prior to site closure. Any wastes that cannot be processed at the Site will be removed in sheeted vehicles or enclosed trailers to an authorised facility in accordance with the relevant Waste Transfer Note procedure and Duty of Care.
- 12.2.4 The Closure Plan will identify the types and quantities of waste likely to be generated from site closure and decommissioning. Any properties associated with various wastes that require special handling procedures will be identified and measures put in place to ensure their correct management, for example:
 - any hazardous materials must be correctly segregated and stored to prevent any incompatible reactions with other materials or risks to personnel;
 - provision of a water supply from a hose or bowser if potentially dusty materials arise.
- 12.2.5 Appropriate containers will be identified and brought to site to safely segregate and store any residual materials requiring removal.
- 12.2.6 Any raw materials such as hydraulic oil, engine oil etc will be stored in appropriate containers and removed off site for use elsewhere. Waste oils will be removed by Registered Waste Carrier to an authorised off-site facility in accordance with the Hazardous Waste Regulations and Consignment Note procedure prevalent at the time. Used tanks will be thoroughly emptied and cleaned and either reused at other sites or cut up for scrap metal recovery.
- 12.2.7 Once waste operations cease, site plant will be decommissioned. Any materials that cannot be viably recovered will be disposed of at authorised facilities.
- 12.2.8 Any concrete and brick waste that arises from demolition work will be crushed and supplied as a secondary aggregate or in accordance with a suitable WRAP / end of waste protocol prevalent at the time.
- 12.2.9 A bowser or hose will be used during decommissioning works to ensure that any potentially dusty materials are suitably damped down to minimise any particulate emissions. Site surfaces and roads will also be damped down to minimise emissions associated with lorry and mobile plant movements during the closure and decommissioning phases.
- 12.2.10 As the impermeable pavements are likely to remain in-situ there is no pathway for potential contamination of groundwater.
- 12.2.11 Suitable records will be maintained during the site closure and decommissioning phases. Records will relate to the types and quantities of wastes produced during decommissioning, Consignment Notes and Waste Transfer Notes relating materials removed off site, Registered Waste Carrier details of the hauliers used, details of the types and amounts of wastes reused, recycled, recovered and disposed of. Records will be made available for inspection to authorised officers of the Environment Agency.

13 CONTINGENCY MEASURES

13.1.1 Contingency measures are required in the event that the Site cannot be operated as normal, i.e. as the facility has been designed to do, e.g. due to:

- Extreme weather events such as flooding, high winds, prolonged periods of dry weather or periods of intense heat or cold;
- Staff shortages;
- Loss of mains water or mains power.
- 13.1.2 Emergency response procedures are in place to protect people and the environment in the event of disruption to normal operations or an environmental accident or incident, see Section 10 above.
- 13.1.3 In the event of an emergency, breakdown of mechanical plant or enforced shutdown (e.g. due to extreme weather) etc, waste deliveries to the Site will be suspended and any loads that arrive at the facility will be refused entry until incoming wastes can be correctly received, stored and processed in accordance with the permit.
- 13.1.4 Waste deliveries to the Site and loads dispatched off site to customers are weighed on the weighbridge, with the measurements recorded. This allows the Operator to keep an ongoing record of the quantity and types of wastes that are on site at any one time.
- 13.1.5 In the event that waste storage approaches capacity limits or the ability of the Site to process materials in accordance with the permit and EMS, wastes will be transferred off site to authorised facilities and customers.
- 13.1.6 In the event of a fire at the Site all operations would cease. No vehicles other than the Fire and Rescue Service, other emergency services (i.e. police and ambulance) or Environment Agency would be allowed to gain access to the facility. Any waste loads in transit to the facility would be contacted and diverted away.
- 13.1.7 In the event of a flood all operations on site would cease. No vehicles other than the Fire and Rescue Service, other emergency services (i.e. police and ambulance) or Environment Agency would be allowed to gain access to the facility.

14 CLIMATE CHANGE

- 14.1.1 The Operator is responsible for maintaining and updating information relating to the potential impacts of climate change and to review this annually based on published projections.
- 14.1.2 The following potential impacts will be reviewed annually in relation to climate change:
 - Effects on existing and planned operations, including taking any additional measures to ensure compliance with the Environmental Permit;
 - Any risks to surrounding neighbouring businesses, local residents and residential properties and the local environment;
 - The potential for multiple events occurring concurrently (e.g. increase in rainfall, flooding occurrence, high winds and prolonged or more intense periods of dry weather), resulting in increasing risk of dust emissions and fire occurrence.
- 14.1.3 A Fire Prevention Plan has been prepared for the site in accordance with Environment Agency guidance 'Fire prevention plans: environmental permits' (https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits). The

Site will incorporate sleeping policeman type bunds at the access points to contain run-off water in the event of a fire. This will serve a dual purpose of also being able to contain excess water in the event of an increase in flooding due to climate change.

- 14.1.4 Water hoses are installed at the Site and are used for dust suppression purposes during dry or dusty weather conditions. In addition, should it be necessary to source additional water due to the impact of climate change, the Operator could potentially abstract water at a rate of 20 cubic metres or less a day (without the need for an abstraction licence) for dust suppression use (subject to agreement with the Environment Agency).
- 14.1.5 All site plant and equipment will be subject to daily inspections during periods of very cold weather (<4°C) and plant will not be operated in the event of frozen pipes etc.
- 14.1.6 The site's EMS will be kept up to date with the latest data from the Environment Agency on flood risk.

15 TRAINING

- 15.1.1 Site staff will be trained and instructed in the procedures required to operate the Site and will be aware of the permitted waste types accepted at the facility as well as the requirements of the Environmental Permit, Fire Prevention Plan (FPP) and EMS etc.
- 15.1.2 A record of all training will be kept on Site or at a suitable secure location off site, see Appendix 9. A staff training matrix will also be maintained, based on the requirements of Appendix 10.

16 SITE DIARY

16.1.1 A Site Diary consisting of accurate and complete reporting and record keeping will be maintained at all times and will be made available for inspection by authorised officers of the Environment Agency when requested.

17 COMPLAINTS

17.1 PROCEDURES IN THE EVENT OF A COMPLAINT

- 17.1.1 Any complaints about the Site, e.g. from members of the public, local residents, neighbouring businesses, visitors, staff and regulatory bodies, including the Environment Agency, will be reported to the Site Manager or other Technically Competent Person (with appropriate WAMITAB Certificate) who is responsible for the site management, e.g. in the absence of the Site Manager due to illness or annual leave etc.
- 17.1.2 The following actions will be taken on receipt of an external complaint:
 - The responsible person receiving the complaint at the Site will immediately record the key details, initiating the investigation process. Details will be entered on the Complaint Report Form, see Appendix 4. The form sets out the key information that should be recorded at this time in order to facilitate further suitable investigation.
 - The Site Manager or other Technically Competent Person will be informed of the complaint as soon as possible, including the location, time and date of the complaint being lodged.

- 17.1.3 In recognising that some complaints can be transient and short-lived, timely notification of complaints directly from the complainant or the Environment Agency is imperative to allow for appropriate investigation. If the complaint occurs more than 12 hours before notification is provided to the Operator, it may not be possible to substantiate the complaint or pinpoint the cause. The Operator will, however, contact the complainant where possible, review any operations at the time which had the potential to cause the complaint and complete and record a comprehensive complaint investigation. For complaints received within 12 hours of the incident the following actions will be undertaken:
 - The Site Manager or other Technically Competent Person will visit the complaint location as soon as possible, with the aim of undertaking monitoring within 2 hours if this is possible within the working day. The Site Manager or other Technically Competent Person will subjectively determine the presence or absence of the cause of the complaint. Opportunities to meet the complainant to discuss the matter directly will be pursued, wherever possible.
 - If the cause of complaint is present, the key 'FIDOR' criteria will be assessed at the complaint location, as follows:
 - Frequency is the cause of the complaint, intermittent or persistent; is there a history of complaints at this location?
 - o Intensity is the cause of complaint faint, moderate, strong, or very strong?
 - Duration how long is the cause of complaint present at this location?
 - Offensiveness provide a description of the cause of complaint; is it high, moderate, or low offensiveness?
 - Receptor sensitivity is the cause of complaint present at a remote or highly sensitive location; is it localised or widespread?
- 17.1.4 The Site Manager or other Technically Competent Person will subsequently undertake the following further assessment process:
 - Review of the operations at the Site prior to and at the time of the complaint;
 - Review of the environmental control systems prior to and at the time of the complaint;
 - Review of the previous complaint history at the location identified.
- 17.1.5 Where a significant complaint is substantiated by the Site Manager or other Technically Competent Person, the Operator will contact the Environment Agency to discuss the incident as soon as possible following receipt of the complaint details, allowing sufficient time for the above investigation to be completed, and within a maximum target response period of 24 hours from complaint receipt. If the necessary contact details are available and direct feedback has been requested the Operator will also contact the complainant directly to discuss the issue, the findings of the subsequent investigation, and any actions arising.
- 17.1.6 Once actions have been completed the Site Manager or other Technically Competent Person will visit the complaint location to ensure that the cause of complaint has subsided.

17.2 MITIGATION MEASURES

- 17.2.1 In the event of a substantiated complaint, the investigation undertaken by the Site Manager or other Technically Competent Person will incorporate detailed assessment of the site infrastructure and waste operations to determine any diversion away from 'normal' site operating conditions.
- 17.2.2 Key items for consideration will be as follows:
 - Material inputs change in waste type, volume, dust characteristics;
 - Mechanical breakdown e.g. of processing plant or delays in waste handling;
 - Procedural failure (human error);
 - Short-term abnormal weather patterns wind direction, temperature, inversions, etc;
 - Abnormal operating conditions temporary highly dusty activities.
- 17.2.3 Upon identification of the likely cause, the appropriate corrective and preventative measures will be identified and implemented under the direction of the Site Manager or other Technically Competent Person. Additional support and technical expertise will be provided by internal / external technical specialists, as required.

17.3 TIMESCALES

17.3.1 In the event that it proves impracticable to carry out adequate remedial measures within one working day, the Site Manager or other Technically Competent Person will notify and agree with the Environment Agency the proposed actions and the timescales for their completion as a programme of works.

18 REVIEW AND AUDIT

- 18.1.1 The Operator maintains a Non Conformance Register, which includes a unique reference number for any non-conformance or complaints incidents, the date of the incident, who reported the incident, a description of the incident, who investigated the incident, what were the actions or outcomes of the investigation (including any mitigation measures) and whether the incident has been addressed and closed or is still ongoing.
- 18.1.2 The Non Conformance Register will be reviewed each month as part of the monthly management meetings. Any complaints about amenity issues such as dust, odour or pests will be discussed and actions suggested and agreed to ensure improvements are made and the likelihood of such incidents reduces going forward.
- 18.1.3 The Operator will undertake an annual audit of the EMS, the Non Conformance Register (including complaints history), environmental performance, objective and targets and future planned improvements. The purpose is to ensure the Site is:
 - Continually improving;
 - Minimising the risk of pollution incidents and preventing any significant impacts to sensitive receptors, including detriment to local amenity;

- Operated in accordance with the latest regulatory guidance;
- Meeting environmental objectives independent of the Environmental Permit.
- 18.1.4 The findings of the annual audit and the Non Conformance Registrar etc will form part of the senior management annual meeting.

APPENDICES:

Appendix 1 Refuelling and Emergency Spillage Procedure

Appendix 2 Record of non-conformance

Appendix 3 General Waste Management

Appendix 4 Complaints Record

Appendix 5 Preventative Maintenance Checklist

Appendix 6 Maintenance Record

Appendix 7 Inspection Record

Appendix 8 Environmental Accident and Incident Record

Appendix 9 Training Record

Appendix 10 Training Needs Checklist

www.wasteandindustry.co.uk Page | 27

APPENDIX 1:

Refuelling and Emergency Spillage Procedure

REFUELLING AND EMERGENCY SPILLAGE PROCEDURE

INTRODUCTION

Environmental Risk

Risk of environmental pollution incidents from the Site are considered to be suspended solids from the deposit and processing of wastes and fuel or oil in the event of a spillage from either a mobile fuel bowser, diesel or oil container or tank.

Mobile plant will be operated in accordance with manufacturers' guidelines and will be routinely inspected and maintained.

To reduce the risk of environmental pollution with regards to potential spillages of fuels the following Refuelling Procedure will be adhered to at all times. In the unlikely event that a fuel spillage does occur then the Emergency Spillage Procedure will be implemented.

REFUELLING PROCEDURE

Aim

To effectively control the risk of pollution that has the potential to arise from the delivery of fuel to mobile plant on Site.

Steps to be followed

The person carrying out re-fuelling must remain with the item of plant at all times observing the operation.

The fuel tank on the item of plant must be checked in order to determine the amount of fuel required.

The fuel nozzle is secured by lock. Before use the fuel nozzle, the hose must be checked for leaks or damage. If any are located, the Site Supervisor or Manager must be informed and they will arrange for remedial action.

The fuel nozzle must be kept upright between the fuel tank and mobile bowser to avoid any splashes / leaks.

Although an automatic cut-off is fitted to the fuel nozzle, do not rely on it totally to prevent any splashes.

Any spillages must be cleared up using absorbent material, following the Emergency Fuel Spillage Procedure below.

EMERGENCY SPILLAGE PROCEDURE

Aim

To ensure that any fuel spillages are contained within an area and cause minimal environmental impact.

Steps to be followed

Small scale Fuel Spill

A small fuel spill is one caused by things such as a splash or spill of fuel whilst filling an item of plant or machinery. The volumes involved are small and are confined to a small area.

If a small spill does occur the spill needs to be covered with absorbent granules from a spill kit.

The absorbent material should be allowed to cover the spill for a sufficient amount of time to allow it to soak up the fuel contamination.

Once the absorbent material has soaked up the spill it should be removed to a quarantine skip for non-conforming waste. From there the waste should be exported off Site to a facility permitted to accept the waste types and all relevant documentation should be maintained by the Operator.

Report to the Site Supervisor or Manager any materials that have been used and need replacing.

Large Fuel Spill

In the event of a major spillage of diesel, oil or lubricants, the essential action to be taken is to prevent the spillage migrating to a position / sensitive receptor where it could cause contamination.

This can be done by:

- Diverting the spillage away from such an area;
- Bunding the spill using pollution socks / sand / soil; and
- Placing absorbent materials on the spillage.

If the spillage is major, it is essential that instant action is taken, using the emergency spill-kits.

If possible, you should try to prevent any further spillage from the source e.g. by turning off the diesel pump, turning off a valve or blocking a hole in the fuel tank.

Protect any nearby drains by placing pollution socks or booms around them, using enough to totally enclose the entrances.

The spill should be reported as soon as reasonably possible to the Site Manager and Environment Agency.

Use the absorbent mats to clear up the spillage and seek specialist advice from appropriate contractors.

Once the absorbent material has soaked up the spill it should be removed to the area of non-conforming waste. From there the waste should be exported off Site to a facility permitted to accept the waste types and all relevant documentation should be held on site.

Report to the Site Supervisor or Manager any materials that have been used and need replacing.

Consequences of not following procedures:

If a spill occurs and the following procedures are not followed, then the Site runs the risk of causing pollution to the surrounding land and water courses. This may result in action being taken against the Site Operator/Permit Holder.

Trade name	State	UN number	Location	Type of containment	Relevant health and environmental properties
Diesel	Liquid	1202	Transported via a mobile bowser, purpose designed container/drum	Mobile bowser / container / drum	 H226 - Flammable liquid and vapour. H304 - May be fatal if swallowed and enters airways. H315 - Causes skin irritation. H332 - Harmful if inhaled.

	H351 - Suspected of causing cancer.
	H373 - May cause damage to organs through prolonged or repeated exposure.
	H411 - Toxic to aquatic life with long lasting effects.
	R20 - Harmful by inhalation.
	R38 - Irritating to skin.
	R40 - Limited evidence of a carcinogenic effect.
	R51 - Toxic to aquatic organisms.
	R53 - May cause long-term adverse effects in the aquatic environment.
	R65 - Harmful: may cause lung damage if swallowed.
	(EU, 1967)

APPENDIX 2:

Record of non-conformance

Record of non-conformance								
Date and time non-conformance identified								
What happened, what was it about?								
What caused	lit?							
What have you done to make sure the	at it does not happen again?							
Was there any significant pollution – for examp	ole oil entering a surface water drain?							
If there was then you must notify the Environment	Yes/No/not applicable							
Agency on 03708 506 506 (open 24hours/day)	Time:							
	Date:							
Have you done so?								
Environment Agency Incident number:								
Please print name	Please print name and sign:							

APPENDIX 4:

General Waste Management

	General Waste Management – Waste Received on Site								
Date	Origin (e.g. Swansea)	EWC Code	Disposal or Recovery Code		From another waste facility?	Amount (tonnes)	Comments		

	General Waste Management – Waste Removed off Site								
Date	Destination (e.g. Doncaster)	EWC Code	Municipal Source? (Y/N)	State (solid, liquid)	Disposal or Recovery Code	Amount of waste (tonnes)	Comments		

APPENDIX 4:

Complaints Record

Complaints Record											
Who made the complaint?											
Name:											
Address:											
Phone No:											
Date and time they made the											
complaint	complaint										
	What	caused it?									
W	as anyone else aw	vare of this? If so, who?									
What was the source of the problem, what went wrong? If source is unknown contact a suitably qualified person to investigate.											
What have	e you done to ma	ke sure it won't happen again?									
Was there any significa	Was there any significant pollution – for example oil entering a surface water drain?										
If there was then you mus		Yes/No/not applicable									
Environment Agency on 03708	3 506 506 (open	Time:									
24hours/day)		Date:									
Environment Agency Incident number: Have you done so?											
You must also notify the Environment of letter via email or letter											
	Please print	name and sign:									

APPENDIX 5:

Preventative Maintenance Checklist

Preventative Maintenance Checklist											
Item requiring		[How o	often?	1		Where are	Who is responsible?			
maintenance	(ti			ropria	te bo		maintenance				
	5 years 2 years Year Month Week Day				2 years	5 years	instructions				

APPENDIX 6:

Maintenance Record

		Maintenance Record
Item*1:		Due*2:
Completed on	Completed by	Comments
e.g. 13/010/21	A. Person	Blockage in drainage system. Blockage removed.
		,
*1 Item e.g. inspe	ı ct fences, inspect d	rainage system

^{*2} Due e.g. weekly, daily

APPENDIX 7:

Site Inspection Record

	Site Inspection Record									
Date	Item	Inspected (yes/no)	Comments							
	Site access road									
	Working areas									
	Drainage									
	Concrete pads									
	Fireproof waste storage bays									
	and areas									
	Plant and equipment									
	Mobile plant (fork lifts etc)									
	Litter									
	Mud/dirt									
	Odour									
	Noise									
	Vermin and insects									
	Fire (fire-fighting equipment)									
	Security									

APPENDIX 8:

Environmental Accident and Incident Record

Environmental Accident and Incident Record										
Date and time of the incident										
What happened, what was it about?										
Time napponou,										
Was anyone else aware of this	– other witnesses? If so who?									
What ca	used it?									
What action did you take to fix the prob	lom2 Ware external agencies involved?									
what action did you take to fix the prob	letti: Were external agencies involveu:									
What have you done to make sur	e that it does not happen again?									
,	11 0									
If there was then you must notify the	Yes/No/not applicable									
Environment Agency on 03708 506 506 (open	Time:									
24hours/day)	Date:									
Have you done so?	Environment Agency Incident number:									
Please print n	 									
riease print n	anie and sign.									

APPENDIX 9:

Training Record

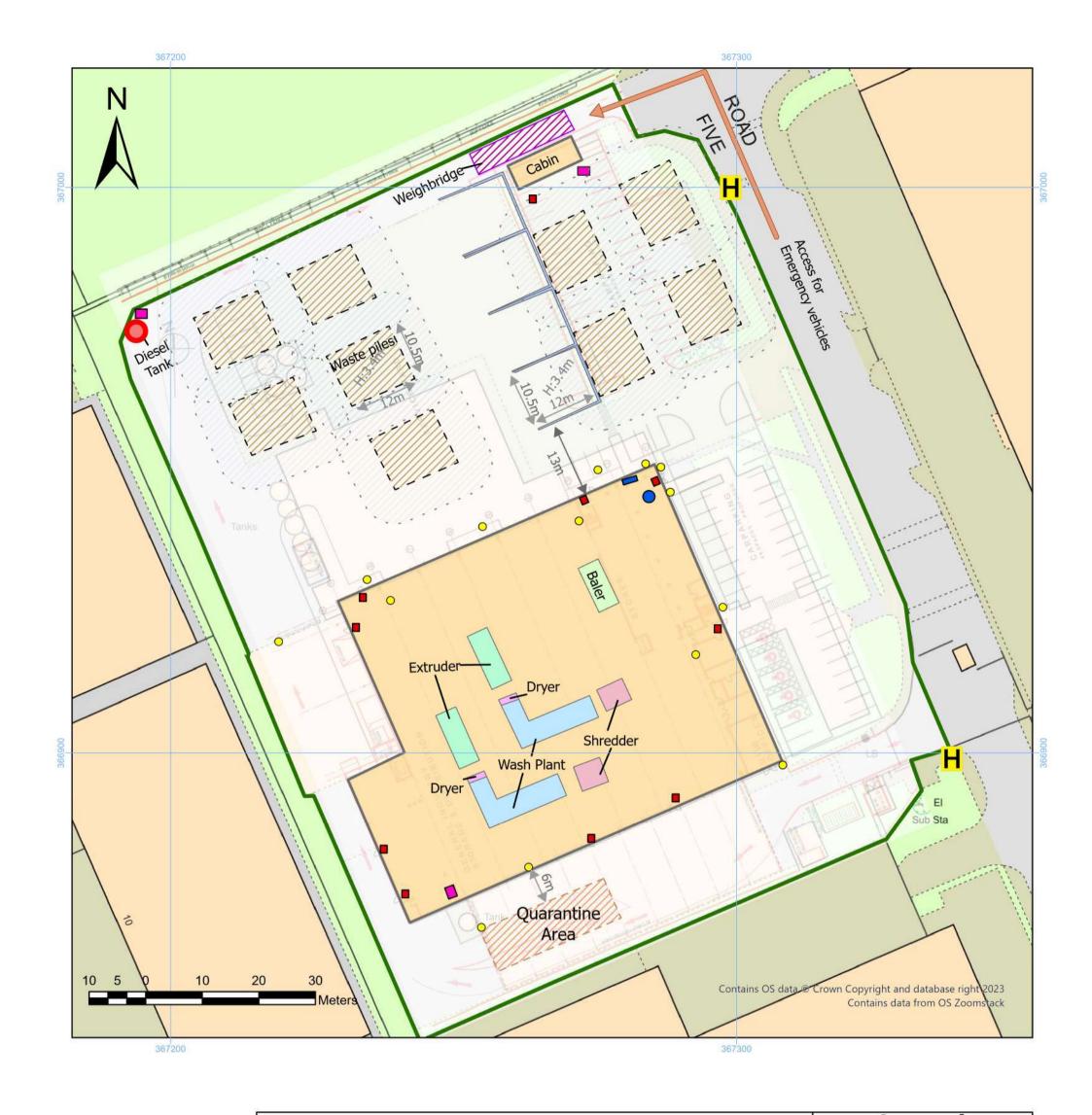
	Training Record												
Employee Name				Job Title									
Training Required	Date Due	Date Done	Passed as competent? (yes/no)	Reviewers signature	Date of refresher	Comments							

APPENDIX 10:

Training Needs Checklist

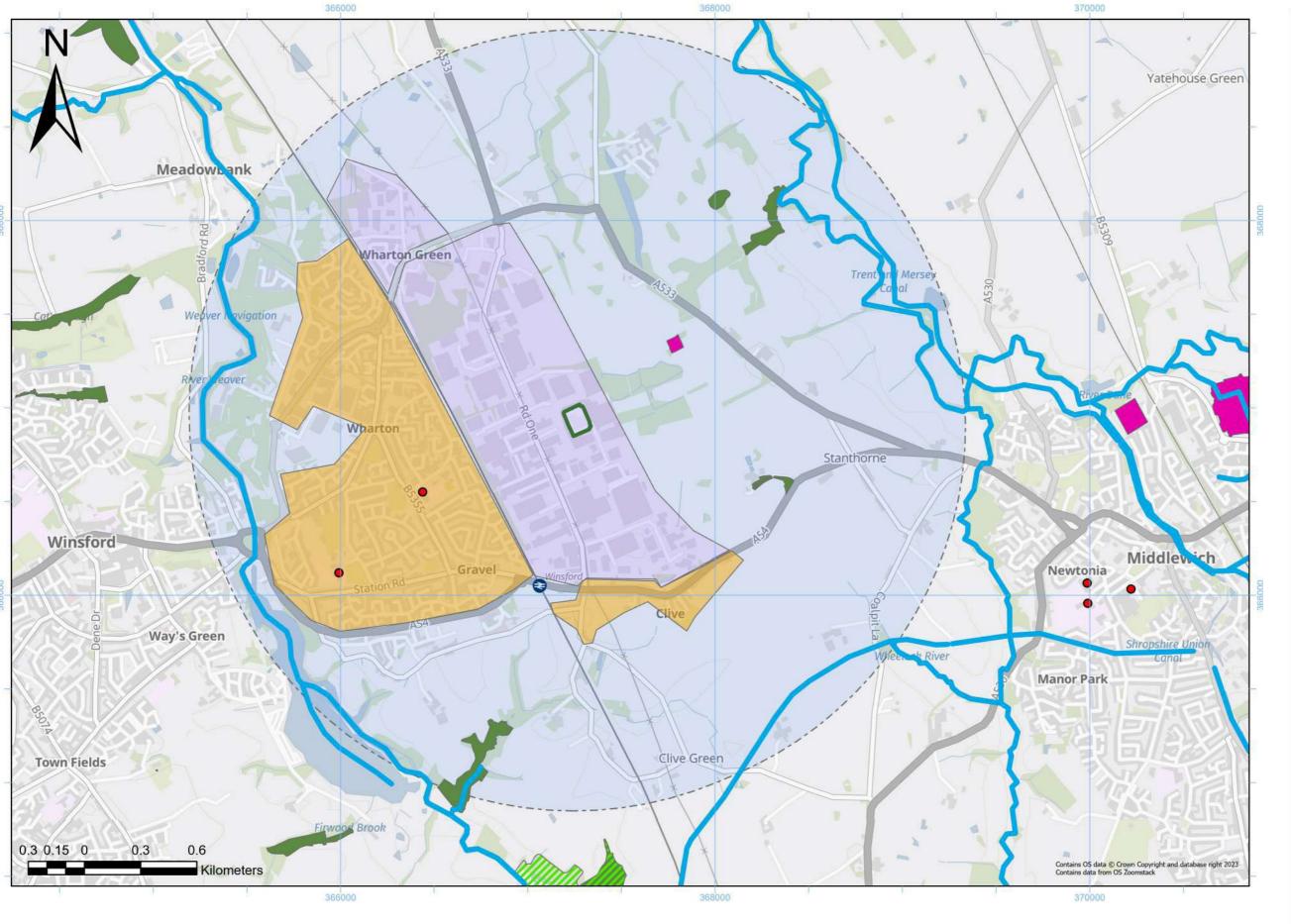
	Training Needs Checklist															
Employee	<u> </u>											Comments				
		Enviro	nment	al Awa	reness		1	Mainte		/	Ac	Accidents and Emergency				
		<u> </u>						Opera	ations							
	Permit role and responsibility, compliance with conditions	EMS, FRMP, Odour Management Plan, Dust and Emissions Management Plan,	Waste receipt including pre-acceptance and acceptance checks, Duty of Care	Waste storage and processing, compliance with maximum storage heights and waste	Product handling, storage and loading	Awareness of local sensitive receptors and complaints procedures etc	Maintenance of plant and equipment	Tanks, containers, bunds and pipework	Fire extinguishers, fire hoses	Spill kits,	Fire	Spill response	Failure of Services	Dust and litter emissions, pests, mud on road etc	Odour emissions	

						1	rainin	g Need	s Chec	klist						
Employee											Comments					
	Environmental Awareness				Maintenance / Operations			Accidents and Emergency				ncy				
	Permit role and responsibility, compliance with conditions	EMS, FRMP, Odour Management Plan, Dust and Emissions Management Plan,	Waste receipt including pre-acceptance and acceptance checks, Duty of Care	Waste storage and processing, compliance with maximum storage heights and waste	Product handling, storage and loading	Awareness of local sensitive receptors and complaints procedures etc	Maintenance of plant and equipment	Tanks, containers, bunds and pipework	Fire extinguishers, fire hoses	Spill kits,	Fire	Spill response	Failure of Services	Dust and litter emissions, pests, mud on road etc	Odour emissions	

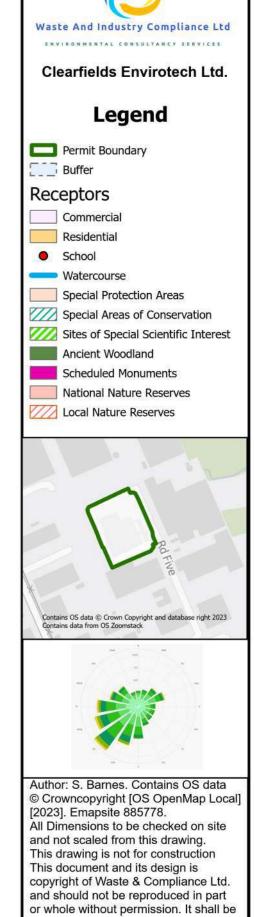




Title: indicative	Legend		
Site Location: F Winsford, CW7	Permit Boundary Bays 6m separation buffer		
Scale: 1:650	Fire Extinguisher Water Mains tap		
Date: 04/09/202	Spill Kit Water Hose		
Drawing Number	er: Clearfields-Wins	sford-DW01	Diesel Tank CCTV
All Dimensions to be check and its design is copyright or whole without permission documents and associate This drawing is not for con	H Fire Hydrant		
Contains OS data © Crow	Grid ref: SJ 67255 66946		



Title: Sensitive Receptors	Date: 15/08/2023	Page Size: A3	Drawing Number: Clearfields-Winsford-DW02
Site Location: Winsford Industrial Estate, Road Five, Winsford, CW7 3SG.	Version: FINAL	Scale:1:20,000	Grid reference: SJ 67273 66909



read in conjunction with accompanied consultant documents and associated

All services to be checked on site and

not scaled from this drawing

project documents.

