

N&P Crayford Materials Recycling Facility Ltd.
Operations, Development & Management Plan
(Site Working Plan / ODMP)

N&P Crayford MRF Ltd.
Century Wharf
Crayford Creek
Crayford
Kent
DA1 4QG

Environmental Permit Reference:
EPR/KB3806FD

Revision: 5.0
January 2026
Status: Final

Table of Contents

- 1. INTRODUCTION 4
 - 1.1. Site Description 4
 - 1.2. The Company 4
 - 1.3. Site Location and Environmental Setting 4
 - 1.4. Specified Waste Management Operations 4
 - 1.5. Planning Permissions 5
- 2. SITE DEVELOPMENT AND INFRASTRUCTURE 5
 - 2.1. Site Layout 5
 - 2.2. Building Construction & Maintenance 5
 - 2.3. Engineered Site Containment and Drainage Systems 5
 - 2.4. Surface Water Drainage System 5
 - 2.5. Foul Drainage 6
 - 2.6. Other Design Features 6
 - 2.7. Construction Procedures and Supervision 6
 - 2.8. Maintenance and Inspection 6
- 3. SITE SAFETY, SECURITY, INSPECTION AND MAINTENANCE 6
 - 3.1. Site Identification Board 6
 - 3.2. Site Security 7
 - 3.3. Lighting 7
- 4. SITE OPERATIONS 7
 - 4.1. Hours of Operation 7
 - 4.2. Minimum Staffing 7
 - 4.3. Technical Competence 7
 - 4.4. Site Supervision 8
 - 4.5. Vehicle Movements 8
- 5. Duty of Care 8
- 6. Waste Acceptance and Control System 8
 - 6.1. Pre-acceptance procedures 8
 - 6.2. Hazards associated with the waste 9
 - 6.3. Weighbridge Procedures 9
 - 6.4. Waste Rejection and Non-Conformance 10
 - 6.5. Waste Reception and Unloading 10
 - 6.6. Material Inspection 10
 - 6.7. Material Sampling 10
 - 6.8. Material Storage 10
 - 6.9. Waste Segregation Processes 10
- 7. Materials Recycling Facility 11
 - 7.1. MRF Layout and Material Flow 11
- 8. AMENITY AND ENVIRONMENTAL MANAGEMENT AND CONTROLS 12

| | |
|--|----|
| 8.1. Control and monitoring of aerial emissions (particulate matter) | 12 |
| 8.2. Control of Odours | 13 |
| 8.3. Control of Noise..... | 13 |
| 8.4. Control of Vermin, Scavengers, Insects and Pests | 14 |
| 8.5. Control of Mud and Debris | 14 |
| 8.6. Control of Spillages..... | 14 |
| 8.7. Groundwater Monitoring System | 14 |
| 8.8. Control of Litter | 14 |
| 8.9. Management of Complaints | 14 |
| 9. EMERGENCY ARRANGEMENTS | 15 |
| 9.1. Risk Assessment and Unit Emergency Plan..... | 15 |
| 9.2. Control of Leaks and Spillages | 15 |
| 9.3. Fire Prevention and Control | 15 |
| 9.4. Contingency Planning | 15 |
| 10. RESOURCE MANAGEMENT | 16 |
| 10.1. Energy | 16 |
| 10.2. Water | 16 |
| 10.3. Natural Resources | 17 |
| 10.4. Fuel..... | 17 |
| 10.5. Waste Generation and Management | 17 |
| 11. RECORDS..... | 17 |
| 11.1. Site Daily Log | 17 |
| 11.2. Reporting | 18 |
| 11.3. Retention and Availability of Records | 18 |

1. INTRODUCTION

1.1. Site Description

N&P Crayford MRF Ltd (N+P) operates the materials recycling facility (MRF) at Crayford. The operation, development and management plan (ODMP) for the facility provides the management framework for the permitted activities. The environmental permit EPR/KB3806FD (for version number refer to the Crayford MRF Electronic Document Management System (EDMS)) for the site specifies certain minimum requirements for environmental and operational control within which the site operates. The ODMP provides further detail of operating techniques to be employed on site together with monitoring and control measures. This ODMP references several drawings throughout. These drawings are available on N+P's Crayford MRF EDMS.

1.2. The Company

N+P has full accreditation (ISO 9001:2015, ISO 14001: 2018 and ISO 45001:2018) for its integrated management systems. The company has transitioned and revised the policies and procedures which the Crayford MRF facility has operated in accordance with under the previous operator (Viridor Waste Management Limited).

1.3. Site Location and Environmental Setting

Crayford MRF is located on land at Century Wharf, Crayford Creek, to the north of Crayford and Dartford Town Centres, and south of the River Thames at National Grid Reference TQ 528 757.

The facility is designed to take both co-mingled and pre-segregated recyclables; material is then separated into component fractions. These are either bulked or baled and stored on site prior to onward transportation to suitable re-processors.

The site and permit boundary is shown marked green on drawing CFD-MRF3500. All permitted waste management activities take place within the green permit boundary. Access to the site is via the A206. The Site Identification Board is located at the site entrance.

1.4. Specified Waste Management Operations

The activities specified in the permit are the segregation, storage and reclamation of materials, as detailed in Table 1.1 of Environmental Permit KB3806FD.

The limits of the activities for the facility can be found on Table 1.1 activities of Environmental Permit KB3806FD.

The waste types permitted for acceptance to Crayford at the facility are detailed in section 2.2 of the Environmental Permit.

The permitted tonnage for the facility is 420,000 tonnes of material per annum.

The maximum storage capacity for waste types are detailed in Table 1.1, these include a maximum storage capacity of 30,000 tonnes of non-hazardous waste.

Under normal operating conditions the maximum tonnage stored on site will be approximately 27,000 tonnes. This will consist of approximately 16,000 tonnes of non-hazardous waste storage

prior to processing and 11,000 of bailed product awaiting collection. This allows for a contingency tonnage should the site experience any disruption to processing.

1.5. Planning Permissions

Planning permissions are held for all current activities which require them. Current planning permissions are available on the N+P Crayford MRF EDMS.

2. SITE DEVELOPMENT AND INFRASTRUCTURE

2.1. Site Layout

The layout of the site is illustrated in the Site Services Drawing CFD-MRF1000.

All external storage and handling areas are constructed from concrete. Internal surfaces are constructed from reinforced concrete. Site surfaces will be drained in accordance with Section 2.2 of this Management Plan.

2.2. Building Construction & Maintenance

Waste and product storage areas are shown in drawing CFD-MRF1000. The containment infrastructure, including hard-standing will be subject to an inspection programme. Defects are recorded in the site daily log and repairs carried out as soon as reasonably practicable.

The location of parking areas provided for site personnel and visitors are indicated on drawing CFD-MRF1000. The location of the office is shown on diagram CFD-MRF1000. The offices are equipped, manned and maintained to an appropriate standard. Substantial construction or mechanical defects which could potentially compromise containment or structural integrity are dealt with immediately. Where possible, permanent repairs are effected within 7 days. If this is not possible repairs are carried out as soon as reasonably practicable. At the end of each working week the site manager's designated deputy conducts a visual inspection of the hard surfacing, drainage structures and buildings. Any defects, silting up or blockages which require future action are reported in the site daily log and acted upon as appropriate.

Table 1.1 (Appendix 1) outlines the engineering and control measures on site.

2.3. Engineered Site Containment and Drainage Systems

The layout of the paved areas of the MRF building, the yard and road frontage and the surface and foul drainage are shown in the drawing CFD-MRF1000.

All activities with a significant pollution potential will be undertaken on an impermeable pavement with sealed drainage to prevent escape of potentially contaminated runoff to soil, surface water or groundwater.

2.4. Surface Water Drainage System

The site inclines with a west to east gradient draining toward the River Cray to the south of the site. Areas containing specified low risk materials drain via an oil interceptor as detailed on drawing CFD-MRF1000.

2.5. Foul Drainage

There is a connection on site to a mains foul sewer, consented via a Trade Effluent Discharge Consent as shown in the drawing CFD-MRF1000.

2.6. Other Design Features

The erection of litter catch netting to prevent the escape of litter from the site in the prevailing wind direction and adjacent to vulnerable areas.

A MRF incorporating a variety of separation equipment to maximize the efficient and effective sorting of materials and product quality.

Baling equipment to maximize payloads of outgoing wastes and minimize on site storage and transport requirements.

Noise attenuation measures are designed into the processing equipment or provided by the buildings surrounding the equipment.

The waste processing area is predominantly enclosed within a steel framed clad structure.

2.7. Construction Procedures and Supervision

Any construction, infrastructure improvements or replacement at the site will be undertaken by a specialist contractor. A suitably qualified Civil Engineer will inspect works to ensure that all necessary standards and specifications are met.

2.8. Maintenance and Inspection

Weekly inspections of site infrastructure will be undertaken by the Technically Competent Manager (TCM) or a person appointed by the TCM. All defects will be reported and logged in the Site Diary.

Any defects or cracks that appear in the concrete hard-surfacing at the site are repaired as soon as practicable and noted in the site daily log. Weekly visual inspections of the drainage, impermeable pavement and site building are conducted. Defects found which may create an unacceptable risk to the environment are rectified immediately. Alternatively, site operations in the vicinity may be ceased in this area until the damage is repaired.

3. SITE SAFETY, SECURITY, INSPECTION AND MAINTENANCE

3.1. Site Identification Board

The site identification board is constructed of durable material and is displayed in a prominent position at the entrance to the site. The board lists:

- The site operator's name, address and contact number
- Opening hours
- Environmental Permit number
- Environment Agency's details including emergency contact details
- Operator emergency contact numbers

The site identification board is inspected weekly with the results of that inspection recorded in the daily site log. Any minor defects are repaired within three working days. Any major defects are repaired within two to four weeks or as otherwise agreed with the Environment Agency.

3.2. Site Security

The site is completely enclosed by perimeter walls and fencing to prevent access by members of the public. Double entrance gates and a personnel gate provide access to the yard and a personnel gate provides access to the rear of the building, all gates are kept locked outside of operational hours. The general condition of the security wall, fences and gate is inspected; the inspections are recorded on daily site log. Any defective parts of the site's security system are made good by a temporary repair within 24 hours of it occurring and permanently repaired within 7 days of the fault being recorded, or in timescale otherwise agreed with the EA.

Both floodlighting and security lighting is fixed to the yard and the road frontage elevations of the building.

At night appropriate lighting will be used only during working hours and security lighting used at other times.

All doors will be locked when the building is not in use.

There are designated safe walking routes around the site. Site personnel ensure visitors adhere to these routes shown on the Site Emergency and Safety Plan.

3.3. Lighting

Adequate lighting is maintained to ensure safe operating conditions. As a minimum, annual inspections and maintenance will be carried out in autumn to assess adequacy of lighting. A copy of the inspection report will be retained in the site control office.

Light fittings are also checked by site personnel at least monthly to ensure all lights are fully operational. This testing is recorded on the daily site log. Repairs which are required are carried out as soon as is reasonably practicable. A qualified electrician will carry out the maintenance.

4. SITE OPERATIONS

4.1. Hours of Operation

The site is open to accept and process waste 24 hours per day 7 days a week.

4.2. Minimum Staffing

Waste will only be received at the installation when minimum staffing requirements are met. The minimum staffing requirement is one supervisor and one operative, for reception of waste material. When processing, staffing levels will be considerably more but actual levels will be dependent on volumes to be process and plant equipment in operation at any time.

4.3. Technical Competence

The current Technically Competent Management for the facility is detailed on site noticeboards and notified to the Environment Agency. The technical competence provided for the facility will be determined by current legislative requirements.

Any changes to the technically competent management at the facility will be submitted to the Environment Agency within 5 working days of the change. The name of the incoming person and evidence of their technical competence will be supplied.

A site organogram and details of relevant qualifications for the MRF's Technically Competent Persons (TCP) are provided on the N+P Crayford MRF EDMS and are displayed on the site notice board. The appointed TCP shall always be contactable whilst operations are in progress.

The name and contact details for the Duty Competent Person shall be available on the site.

4.4. Site Supervision

During operational hours the facility will be supervised by N+P employees or contracted staff that are trained with the requirements of the site permit relevant to the area for which they are responsible. Operational staff who deputise for site management will be suitably trained. Training needs are identified in the Training Matrix which forms part of the Management System. Records of individuals' training are maintained on site.

4.5. Vehicle Movements

Access to the site is from the A260 Thames Road. Site and weighbridge operatives supervise the safe access and egress of vehicles visiting the facility.

5. Duty of Care

All incoming waste loads will be supported by appropriate documentation detailing the source and description of the waste for Duty of Care purposes. A copy of this description will be kept at the site office.

All loads will be described according to the type of material and will only be accepted if compliant with Table 2.2 of the permit. Duty of Care requirements are described in the 3.7 Waste Acceptance and Control System below. Updates to Duty of Care legislation are available in the Crayford MRF EDMS Legal Register, where Duty of Care legislation requires more comprehensive requirements than those detailed below, the revised legislation takes precedence.

A visual check will be made by site personnel to ensure that an adequate description has been provided. Where a waste description is not deemed satisfactory the vehicle and its load will be directed to a holding area where a thorough inspection will be made before a final decision is made.

Where material is not acceptable under the terms of the permit entry to the site will be refused with the load directed to an alternative licensed site wherever possible. A record will be made of rejected waste in accordance with company procedures and the TCM will be made aware.

6. Waste Acceptance and Control System

6.1. Pre-acceptance procedures

All inputs are assessed for suitability of acceptance by an appropriately trained individual. In order to ensure that material which arrives at the installation is acceptable under the permit, waste enquiry forms are normally completed by the customer for waste not usually delivered to the facility. A response to the following detail is requested:

- Customer contact details
- Producer contact details
- Waste description including composition
- Details of the process producing the waste, including variability
- Method of transport/delivery
- EWC code
- Physical state
- Waste quantity

6.2. Hazards associated with the waste

An assessment will be undertaken by a suitably qualified person, in accordance with the waste acceptance procedure which meets current legislative requirements. Wastes acceptable at the facility are detailed in permit KB3806FD.

6.3. Weighbridge Procedures

All wastes arriving at the facility are weighed on the incoming weighbridge and the following information checked and recorded:

- Date and time of load receipt
- Waste carrier's name and registration number
- Waste quantity (in tonnes or cubic metres)
- European Waste Catalogue code(s) of the waste
- A written description of the waste characteristics
- The identity of the waste producer
- Vehicle registration number
- Vehicle type (and method of containment)
- Driver's name

Representative samples to characterise the waste received on site are performed through a visual inspection of the waste on arrival. This will confirm the waste composition and highlight any potential hazards or non-conformances. This technical assessment will be carried out by suitably qualified and experienced staff members who understand the capabilities of the site and are independent of sales staff, responsible for obtaining customers' business. This information is necessary to:

- Screen out any unsuitable wastes
- Confirm the details relating to composition, and identify verification parameters that can be used to test waste arriving at the site
- Identify any substances within the waste (e.g by-products) that may affect the treatment process
- Identify any substances within the waste that may react with other reagents
- Accurately define the range of hazards exhibited by the waste
- Identify any substances within the waste that may be unaffected by the treatment process and transfer in an unaltered state as a residue of the effluent
- Ensure regulatory compliance

The weighbridge operator ensures that the vehicle driver has relevant Personal Protective Equipment (PPE) as well as current copy of the Site Rules.

6.4. Waste Rejection and Non-Conformance

Non-conforming waste is immediately reported to the Site Supervisor or Manager. Waste which has not been off-loaded will be rejected from the facility. Waste which has been off-loaded will be relocated if it is safe and feasible to do so. Waste which cannot be reloaded will be stored in a designated quarantine area with a suitably impermeable surface. The relevant Unit Emergency Plan (UEP) will be followed in this circumstance. The table below defines storage periods for wastes with varying potential hazards. The TCM define the storage period for each material, the EA will be notified of non-conforming materials received at the site and an incident report completed in line with N+P's Environmental Management System (EMS).

| Waste Type | Maximum Storage capacity | Maximum Storage Period |
|------------------------|--------------------------|------------------------|
| Clinical Waste | 4 x lockable 1100l bins | 1 week |
| Other high risk wastes | 5m ³ | 1 week |
| Other low risk wastes | 5m ³ | 1 month |

6.5. Waste Reception and Unloading

All vehicles are directed to the relevant deposit area by the weighbridge operator. The vehicle driver will be given instruction on discharge procedures. The traffic co-ordinator will be informed of the nature of the material and allocate the appropriate plant to offload the materials.

6.6. Material Inspection

Once a vehicle a vehicle has discharged its load an operative will visually inspect it to check that only permitted waste is contained in the load. If any potentially non-conforming waste is detected, the TCM will be contacted to determine how the load should be dealt with.

6.7. Material Sampling

Input and output (product) materials are sampled in accordance with the Environmental Permitting (England and Wales) Regulations, specifically the MRF Code of Practice. The information is reported in accordance with the permit requirements.

6.8. Material Storage

Mixed waste requiring processing will be discharged into areas specified in drawing CFD-MRF2999. Following processing, wastes will be stored in designated areas according to capacity and time restrictions designated in drawing CFD-MRF2999. Source segregated materials, and co-mingled materials for onward transportation will be discharged and stored separately as specified in drawing CFD-MRF2999.

SRF Bals will be stored within the bale storage areas within bays 6 and 7.

6.9. Waste Segregation Processes

The waste segregation processes on site are designed to obtain maximum separation and recovery of materials, and to reduce bulk and increase payloads of materials leaving the site. Specific work instructions relating to each part of the process are held electronically on the Crayford MRF EDMS. The details of instructions are communicated to operatives through regular and recorded training sessions. To ensure that the quality of the product is maintained regular checks are carried out in accordance with the business management system.

7. Materials Recycling Facility

7.1. MRF Layout and Material Flow

A flow diagram of the MRF processes and operations is available on the Crayford MRF EDMS. This illustrates where specific waste streams are separated throughout the process. A brief outline of the key processes within the MRF is given below.

Material Receipt

Feed material for the MRF processes will be deposited into designated reception areas. The Traffic Co-ordinator will supervise discharge and report non-conformances to the Site Supervisor. Single stream recyclables may be kept separate and processed accordingly.

Trommels

Mixed materials pass into the trommel; this rotating cylinder removes different sized fractions. Glass, shredded paper, plastic and metal bottle tops fall through the smaller holes where the material is screened and crushed within the glass plant.

As the larger mixed materials travel through the trommel, the size of holes increases to approximately >160mm and items such as cans, plastic bottles and small pieces of paper are diverted onto an underlying conveyor.

The remaining fraction, predominantly newspapers, magazines and cardboard emerge from the end of the trommel. These then pass across another conveyor where final hand picking removes plastic bottles, plastic bags and large pieces of cardboard.

Overband Magnets

Ferrous materials are removed by Overband magnets which are placed over the conveyor.

Eddy Current Separator

Aluminium cans are removed from the remaining material by an eddy current separator. Non-ferrous metals are repelled by the separator.

Optical Sorters

Remove further non target material using a computer system that controls compressed air jets which directs the materials to the specified bays.

Picking Lines

Conveyor belts carry mixed materials past operatives who separate materials into defined fractions and deposit them down chutes to separate storage bays.

Plastic Sortation Plant

The Plastic Plant facility separates plastics, metals and glass using a variety of processes and technologies. The separated materials are stored within bunkers prior to baling.

Ballistic Separator

Materials such as cans, plastic bottles and small pieces of paper, that pass through the smaller <160mm trommel holes are fed via a conveyor to the ballistic separator. The movement of a series of paddles further sorts the remaining fractions. The smaller elements drop between the paddles and are conveyed to the glass plant, large items such as cans and plastic bottles are bounced on the paddles and fall backwards onto a conveyor that leads to the plastic sortation plant bunker. Flat items are carried to the picking line for further processing.

Baler

Balers, high powered compressors, are used to compress materials into bales which are secured for transportation again minimising the number of loads required to transport materials. Balers are located under cover to minimise the potential for wind-blown litter and water ingress.

Sorting and Storage

Periodically bulky recyclable materials are received on site; these will be deposited at designated storage points. Mechanical or manual sorting will be carried out and the material will be placed in suitable containers for transportation. Residual waste will be placed in the appropriate stockpile for removal from site.

SRF Line

The SRF produced by the new plant will be derived from clean Dry Mixed Recycling (DMR) which is a product from the existing activities on site. Residual >150mm material will be fed into the SRF plant. This material will be shredded as part of the SRF line. After the shredder sub 50mm material will be fed into the SRF process.

8. AMENITY AND ENVIRONMENTAL MANAGEMENT AND CONTROLS

This section details the environmental monitoring which is undertaken across the whole site and includes:

8.1. Control and monitoring of aerial emissions (particulate matter)

Control:

N+P seeks to minimise and/or where possible reduce emissions of particulate matter from the Facility. Dust is controlled by damping down with water from a mobile bowser when deemed necessary by the Operations or Production Manager. If this is not sufficient to prevent dust release the measures identified in the Unit Emergency Plan (UEP) are implemented.

Weather conditions and dust are included as part of the daily inspection by site staff and are recorded on the site daily log.

Potentially dusty wastes first undergo a trial load to ascertain if it can be accepted effectively at the facility. The waste stream is assessed, and an acceptance procedure developed in accordance with section 3 (waste acceptance) prior to the arrival of the waste to the site.

Monitoring:

Routine qualitative monitoring checks are undertaken by the Site Management or designated personnel at daily intervals to confirm that the site is not generating unacceptable emissions of

particulate matter. This qualitative monitoring consists of visual monitoring of emissions, a record of which is noted in the site daily log.

Quantitative monitoring checks may also be undertaken when required and as directed by the TCM to assess the concentration of any airborne particulate matter emissions from site.

Should quantitative spot measurements be required they will be undertaken at an upwind point and at not less than two sample points downwind of the site boundary. The number of spot samples may vary due to changing wind patterns and the precise location of the monitoring is recorded.

Should either qualitative or quantitative monitoring indicate a potential impact to an off-site area then the Site Manager will be informed, and appropriate remedial and control measures instigated.

8.2. Control of Odours

Crayford MRF does not normally accept malodorous wastes; however, it is likely that occasionally there will be a non-target (unwanted) biodegradable content in accepted waste. Odour on site is assessed during the daily site inspection and recorded in the daily site log. Odour complaints are investigated as soon as they are received to establish the potential:

- Odour source at the site
- Pathway between the site and complainant
- Effect of wind direction

By following the Company's Environmental Management Systems, the Site Manager will investigate any odour complaint by walking the site perimeter and, should the information be available, visit the area the complaint has arisen from.

Should a site odour source be identified the Site Manager or authorised person will implement appropriate measures to remove the odour potential. This may include:

- Removal of malodorous wastes from the facility
- Placing cover material over waste to prevent odorous emissions until waste can be removed
- Instigating the use of an odour masking agent to minimise odour

Waste storage bays containing stockpiles which may include biodegradable content are cleared at least fortnightly to ensure no waste is stored for longer than this period. When this is accomplished it is recorded in the daily site log.

8.3. Control of Noise

Due to the site location, the number of sensitive receptors within a 500-metre boundary of the site has been assessed to be low.

Noise monitoring at the site will be undertaken in response to complaints, noise monitoring locations will include:

- South east corner of the site, adjacent to the weighbridge
- North west corner of the site next to the pumping station

8.4. Control of Vermin, Scavengers, Insects and Pests

The site is inspected by site personnel at least weekly for the presence of vermin, scavengers and pests. This inspection is recorded in the site daily log. Appropriate measures are taken should the inspection reveal any activity.

A specialist contractor visits the site at least quarterly to inspect for vermin. The result of this inspection is recorded in the pest control log and the inspection records kept on site.

A record will be kept within the pest control log of the various methods used to deter and control pests (birds) with a comment to qualify their perceived effectiveness.

8.5. Control of Mud and Debris

The site surface, including the approach road and yard area, will be inspected for mud and debris daily and a record of this inspection will be made in the site daily log. Site staff have access to wash-down hoses and a power wash to clean the site vehicles. The mobile plant operator is responsible for the item of mobile plant being maintained to an acceptable standard. The surface of the yard area is swept as required by site staff. The Site Supervisor determines when this must be done. If significant mud or debris escapes from the site, the relevant UEP will be implemented.

8.6. Control of Spillages

Spill control kits will be maintained at suitable locations around the facility, for larger spillages suitable alternative absorbent materials will be used. When a spillage is identified the relevant Unit Emergency Plan will be employed. An incident report will be completed in accordance with the EMS.

8.7. Groundwater Monitoring System

No risk of groundwater impact is perceived at the site due to the use of concrete hard standing in all areas of waste storage or management. Considering the site infrastructure and maintenance programme, no pathway for contaminant transfer to groundwater exists. Groundwater monitoring is therefore not undertaken at the site. N+P will continue to review this situation at regular intervals.

8.8. Control of Litter

Crayford MRF's Litter and Dust Management Plan (L&DMP) details the measures that shall be implemented and maintained by N+P throughout the operational life of the site to assess, minimize and, wherever possible, to prevent the escape of airborne litter from the confines of Crayford MRF in accordance with Condition 5.5 of EPR/KB3806FD.

It provides the explicit list of 'appropriate measures' required for effective litter and dust management and control and serves to aid the decision-making process on the choice of controls, general site design, and operational practice in line with current industry best practice.

Crayford MRF's L&DMP can be found on the Crayford MRF EDMS.

8.9. Management of Complaints

All complaints are investigated immediately, and all reasonable measures taken to substantiate the complaint and alleviate the issue if the complaint is substantiated.

An incident report is raised by N+P's Incident Management System (IMS) and a record is made of any actions taken because of the incident. If required timescales are also set for any planned alterations which may help prevent re-occurrence of the incident.

The report is closed out by the Site Manager when they are satisfied the issue has been fully addressed.

9. EMERGENCY ARRANGEMENTS

9.1. Risk Assessment and Unit Emergency Plan

N+P identifies risks using a risk register. The risk register identifies all potential risks including H&S and Environmental risks and documents the control measures in place. The Risk register is stored on site and is an active and live document.

While the ODMP details normal operations, in the event of abnormal or emergency situations the Unit Emergency Plans (UEPs). The Risk register and works alongside Unit Emergency Plans (UEPs) which address all potential abnormal conditions. The UEP is a live document reviewed for adequacy after each use and at least annually. Current version of the UEPs are available on the Crayford MRF EDMS.

The current emergency contact list is available on the Crayford MRF EDMS and at key locations within the facility. Any changes to these details relevant to the permit will be notified to the EA with five (5) working days of the change.

9.2. Control of Leaks and Spillages

Oil and fuel are stored to comply with the requirements of the Oil Storage Regulations (England and Wales) 2001. All masonry bunds are coated with an impermeable membrane in accordance with these regulations.

Leaks and spillages of liquids are treated immediately. Emergency spillage kits are available including absorbent material and means to prevent escapes of spillages.

Leaks and spillages, and the appropriate remedial action taken are recorded on an incident report and the report number is entered onto the daily site log.

9.3. Fire Prevention and Control

No waste shall be burnt on site.

The procedures for fires discovered on site are detailed in the UEP.

N+P operates a No Smoking policy within the operational areas and has designated smoking areas within the boundaries of the site.

9.4. Contingency Planning

In the event of an unexpected incident or emergency the Production Manager will assume the position of incident controller. The EA and/or Health and Safety Executive are contacted as appropriate to the type of incident as specified in the UEP.

Should the Production Manager require technical assistance from support services they will contact the appropriate company specialist(s).

The business continuity and recovery plan will be implemented. A copy of the business continuity and recovery plan is available on the Crayford MRF EDMS.

If there is a mechanical breakdown the site maintenance staff will respond immediately. If there is a mechanical breakdown which cannot be resolved within 24 hours of the incident and is likely to cause significant disruption to site operations the local Environment Agency will be notified.

10. RESOURCE MANAGEMENT

N+P undertakes environmental Key Performance Indicator (KPI) assessments on a quarterly basis. The combination of environmental and financial KPI data produced enables the Site Manager to assess where the resource savings can be implemented.

N+P considers the environmental consequences of products and services. The company's ethos is to encourage suppliers to offer environmentally sensitive options as standard. Bans or minimisation restrictions on environmentally unsound products have been implemented.

10.1. Energy

Energy Consumption Audit

A review of energy use at the site is undertaken annually within the Management System. The review recommends practicable measures for improving energy efficiency and specifies a maximum period for actions to be undertaken.

The audit will identify energy use by source for the different installation operations. Sources of energy to be evaluated include electricity, gas, oil, coal and diesel where they are employed at the facility.

Energy Efficiency Plan

Plant and Equipment Selection

The selection process for new plant and equipment will include an evaluation of its energy efficiency.

Maintenance

All plant and equipment in use at the installation are subject to ensure that they continue to operate at optimum energy efficiency and that fuel consumption does not increase due to inefficient performance.

A record of fuel consumption is maintained to enable identification and analysis of changes in the efficiency in plant. This information will be used to identify the need for additional maintenance or operator training. It will also be used in the annual energy review.

10.2. Water

Water use on site is minimised. The expected uses of water are:

- Welfare facilities
- Vehicle washing

- Cleaning of plant
- Fire extinguishing
- Damping down of surfaces to prevent dust

Through the company's KPI water use is reviewed annually. Any reduction in water use that is identified will be thoroughly assessed by site management for potential implementation.

10.3. Natural Resources

N+P ensures that the environmental consequences of products and services are considered. The impetus is to encourage suppliers to offer environmentally sensitive options as standard. Bans or minimisation restrictions on environmentally unsound products have been implemented.

The Crayford MRF EDMS maintains up-to-date procedures thus minimising the need to print unnecessary copies for individual sites.

To ensure the use of raw materials is evaluated and minimised, raw material use is reviewed on an annual basis. The review considers any opportunities for reduction in use and provides an action plan for improvements.

10.4. Fuel

Plant and vehicle operators record fuel usage for their machines and vehicles. These records are used to establish efficiency of the running site-based equipment. Decreases in efficiency are investigated to establish whether an underlying cause can be identified, and a solution implemented.

When new plant or vehicles re purchased or leased the operational efficiency forms a significant element of the decision-making process. Plant is maintained to the manufacturers' required standards to ensure that emissions are minimised.

10.5. Waste Generation and Management

The overriding ethos of the Crayford MRF is to recover materials for re-use or recycling. Consequently, the amount of commercial, industrial and domestic waste disposed of to landfill is significantly reduced.

New recycling and reuse technologies and opportunities are constantly developing. These will be reviewed as and when required by site management to determine their technical and commercial viability at Crayford MRF.

Non-hazardous solid wastes produced at the facility are processed through either the MRF or transfer station. The site will not accept or handle any hazardous wastes.

11. RECORDS

11.1. Site Daily Log

A site daily log is maintained on site.

The daily site log is subject to review and modification as required. The current version is available on the Crayford MRF EDMS.

11.2. Reporting

All information required by the permit is reported to the EA by the designated time unless agreed otherwise with the EA Officer for the site.

11.3. Retention and Availability of Records

Site records for incoming and outgoing wastes and any other records required by the permit are retained. The records are retained on site and are available for inspection by officers of the EA at any reasonable time. Records relating to the acceptance of waste at the weighbridge, and their retention arrangements are summarised below: -

Weighbridge tickets and manual tickets/disposal record sheets are retained within N+P's organisation for three years.

Duty of Care transfer notes must be retained within N+P's organisation for at least three years.

[END]

Appendix 1

Table 1.1 – Engineering and Pollution Control Regime

| Table 1.1 - Engineering and Pollution Control Regime | | | | |
|---|---|---|--|---|
| Activity | Containment Design | Surface Construction Material | Drainage | Treatment/Collection |
| Vehicle movement areas | Not applicable | <ul style="list-style-type: none"> • 200mm pavement concrete with steel reinforcing. • 220mm type 1 sub-base. | <ul style="list-style-type: none"> • Collected via drains to sealed pipework system, discharge to foul sewer. • Drained via sealed underground pipework to Class1 by pass separator. • Penstock valve to be used in emergency. • Discharging to River Cray. | <ul style="list-style-type: none"> • Class 1 by-pass separator to River Cray under Discharge Consent. • Yard drains to foul sewer. |
| Deposit and sorting of bulky recyclables | Three-sided enclosed building with a watertight roof | <ul style="list-style-type: none"> • 200mm pavement concrete with steel reinforcing. • 220mm Type 1 sub-base. • Existing concrete pavement used where in good condition. Proprietary mastic sealant to joints. | <ul style="list-style-type: none"> • All falling to rear of building or with concrete upstand added to front of building. • Roof enclosure to minimise generation of run off. • No formalised drainage arrangements inside building. • Concrete upstands at all exits to the building to prevent any fluids escaping or surface water entering or falling to rear of building. • Spillages procedures in place to clean up any fluids. • Roof water down piped to yard drains. | <ul style="list-style-type: none"> • Granules used in spillage clean up to be placed in sealed container stored within building. Disposal is via an appropriate registered waste carrier. |
| Storage of residual wastes | Retaining walls of concrete keyed into concrete surface | | | |
| Storage of green wastes | Not currently undertaken | | | <ul style="list-style-type: none"> • Yard drains to Class 1 by-pass separator to River Cray under Discharge Consent. |
| Paper and cardboard deposit | Within sheltered bays | <ul style="list-style-type: none"> • Within sheltered bays. • 200mm pavement concrete with steel reinforcing with mastic proprietary sealant for joints • 220mm Type 1 sub-base | <ul style="list-style-type: none"> • To general yard surface water drainage. • Discharge to River Cray via Class 1 by- pass separator. | <ul style="list-style-type: none"> • Class 1 by-pass separator to River Cray under Discharge Consent • Granules used in spillage clean up to be placed in sealed container stored within building |
| Mixed kerbside recyclables - input | Within existing MRF building or on concrete surface outside the | <ul style="list-style-type: none"> • 200 mm pavement concrete with steel reinforcing with mastic proprietary sealant | <ul style="list-style-type: none"> • Surfaces within buildings on fall to drain to rear of building • External areas to general yard drainage, | <ul style="list-style-type: none"> • Class 1 by-pass separator to River Cray under Discharge Consent |