STACEY
PROCESSING LTD

ENVIRONMENTAL PERMIT APPLICATION
SUPPORTING STATEMENT

RYDER POINT WORKS
WIRKSWORTH
MATLOCK
DERBYSHIRE
DE4 4HE

Document Reference: SPL1000/05.R2
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SiriUS Environmental

Project Quality Assurance
Information Sheet

ENVIRONMENTAL PERMIT APPLICATION – SUPPORTING STATEMENT
RYDER POINT WORKS, WIRKSWORTH, MATLOCK, DERBYSHIRE, DE4 4HE

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ENVIRONMENTAL PERMIT APPLICATION

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1.0 INTRODUCTION

1.1 Scope & Background

1.1.1 Sirius Environmental Limited ('Sirius') has been commissioned by Stacey Processing Ltd to prepare and submit a Site Condition Report to support an Environmental Permit Application for the operation of a Ryder Point Works, Wirksworth, Matlock, Derbyshire, DE4 4HE. The relevant documentation is submitted in accordance with the Environmental Permitting (England & Wales) Regulations 2016 (referred to hereafter as the EP Regulations).

1.1.2 Stacey Processing Limited are seeking to gain a permit for an existing Glass Recovery Operation and a Construction, Demolition and Excavation Waste ('C, D & E waste') Treatment Facility located near Wirksworth, Derbyshire. The site will accept glass waste and construction and demolition waste. To date all activities that are the subject of this application have been operated under various registered waste exemptions. Changes to the waste exemptions scheduled to be implemented in 2024 therefore requires the activities to be regulated by an Environmental Permit.

1.1.3 The glass waste will be dried, size screened, separated, sorted by colour and transferred off site or sent to be ground and crushed into the appropriate sizing to produce the sandblasting shot. Shot-blast is subsequently bagged and stored onsite awaiting transportation to the customer

1.1.4 The C, D & E waste is washed and screened or screened and crushed into various grades of recycled aggregate for use in other onsite activities (e.g. roadstone coating) or for resale to consumers as secondary aggregates. The details of the application proposal are given in **Section 1.3**.

1.2 Site Setting

1.2.1 The proposed site to which the application will relate is an existing industrial site located at Ryder Point Works, Wirksworth, Matlock, Derbyshire, DE4 4HE. The National Grid Reference (NGR) for the site is SK 26045 54785. The site location has been depicted in **Drawing No. SPL1000/08/01**.

1.2.2 The site area was originally constructed as part of the working area for the adjacent limestone quarry between 1955 and 1971. The Ryder Point Works estate is also occupied by other mineral activities and a Local Authority road salt storage depot.

1.2.3 The site itself currently comprises seven buildings. The associated external areas comprise the lined surface water pond, staff car parking and Heavy Goods Vehicle (HGV) parking areas, equipment storage areas, staff welfare facilities, storage areas for the sorted wastes awaiting transfer and storage areas for the processed glass. Entrance and egress to and from the site for heavy good vehicles is via a junction off Hopton Via Gellia that also provides access to the adjacent quarry. Hopton junctions with Manystones Lane to the southeast of the site. The site entrances are gated and will be locked outside of operational hours.

1.2.4 The proposed permitted boundary area is depicted in **Drawing No.: SPL1000/08/02**. The site is bounded to the north by an industrial venture, beyond which lies agricultural land. Hopton Via Gellia road lies along the eastern boundary, beyond which lies agricultural land and a former quarry and mines approximately 900m distant. The southern boundary is defined by the embankment of the former Hopton Wood Branch of the London, Midland and

Scottish Railway which is now a public walking route, beyond which lies agricultural land and Denewood Farm and Enniscloud Meadow Farm. The land to the west of the proposed permitted site is occupied by waste processing centre operated by Linston Limited, beyond which lies Ryder Point Quarry operated by Longcliffe Limited. Carsington Windfarm spans both the quarry and the agricultural land west of the quarry.

1.2.5 The town of Wirksworth is located approximately 2.7km to the east-southeast of the site, the village of Brassington lies 2.9km to the west of the site, and the hamlet of Carsington and Hopton lies 1.6km to the south. Matlock is located 6.5 km to the northeast and the junction of Hopton Via Gellia and Manystones Lane is 130m from the site entrance. The A5012 is ~ 1.7km north of the site. The site lies within an area subject to extensive limestone quarrying, together with agricultural land.

1.2.6 The closest residential properties to the permitted site are Arm Lees Farm ~400m to the North, Denewood Farm c.530m to the east and Enisclouds Meadow Farm c. 500m to the west. The Ryder Point Barn holiday let is located ~290m to the north of the site boundary. The remainder of the surrounding area is occupied predominantly by agricultural land.

1.2.7 The local topography is relatively hilly landscape with steep upland valleys.

1.2.8 The site does not lie within 2km of an Area of Outstanding Natural Beauty (AONB), Local Nature Reserve (LNR), National Nature Reserve (NNR), Ramsar site or Special Protected Area (SPA).

1.2.9 The site lies entirely within a Source Protection Zone I (Inner Protection Zone) (SPZ). The Peak District Dales Special Area of Conservation (SAC) is located ~930m north of the site at it nearest point. Gellia Woodlands Site of Special Scientific Interest (SSSI) is located ~675m to the northeast of the site at ifs nearest point.

1.2.10 The site lies within 250m of the River Trent (Source To Confluence With Derwent) NVZ. These are defined as areas designated as being at risk from agricultural nitrate pollution. The designations are made in accordance with the Nitrate Pollution Prevention Regulations 2015.

1.2.11 Three Local Wildlife Sites border the site. The Ryder Point Slurry Pond to the northwest. The High Peak trail to the south, and the Hopton tunnel Cutting HPT to the southeast across the road. The Ryder Point Slurry Pond is home to Protected species screened for Environmental Permits.

1.2.12 There are two ancient woodlands situated within 2km of the site. These include Stone Dene Ancient and Semi-Natural Woodland c. 650m south of the site, and Ball Eye Wood Plantation on Ancient Woodland c.900m north of the site.

1.2.13 Deciduous woodland is also present within 2km in all directions, the closest of which immediately adjacent to the site along the northern and south-eastern boundaries. Deciduous woodland is a protected priority habitat.

1.3 Summary of Environmental Permit Application

1.3.1 Stacey Processing Ltd are applying for a bespoke Environmental Permit to operate a waste treatment facility for the recovery of glass and construction, demolition and excavation wastes. The proposed Environmental Permit boundary is shown in **Drawing No. SPL1000/08/02**.

1.3.2 The proposed European Waste Category (EWC) codes to be permitted at the site are listed in **Appendix SS2**. The maximum tonnage of permitted non-hazardous glass waste to be accepted and processed at the facility in any year shall not exceed 125,000 tonnes – of which 75,000 tonne will comprise waste glass with the remaining 50,000 tonnes comprising construction, demolition and excavation wastes. The maximum storage capacity of the site is 20,000 tonnes.

1.3.3 Waste will be sorted by size initially. The >8 mm fraction is concentrated then put through mechanical separation of glass from the residual waste. Colour sorting of these glass fragments is into clear or non-clear categories. The colour separated glass is kept in 3 storage hoppers awaiting transfer off site.

1.3.4 Basic Pre-Application Advice was sought (Reference: EPR/YP3622SW/P001) which advised on the required application forms, the required supporting documents and provided a nature and heritage screening. According to the Environment Agency (Environmental Permitting) (England) Charging Scheme (2022; v1.0), the application falls under Section 1.16.12 – 'Physical treatment of non-hazardous waste'. The associated fee for this application is £7,930. Additional fees for the assessment of a Habitats Assessment (£779) and a Dust Emissions Management Plan (DEMP) (£1,241) are also included.

1.3.5 This Supporting Statement has been written to outline the proposed activities at the site as well as form the site's Environmental Management System (EMS). This Environmental Permit Application (EPA) comprises the following documents:

- Application Forms (Parts A, B2, B4 and F1)
- Non-Technical Summary,
- Supporting Statement
- Site Condition Report
- Environmental and Accident Risk Assessment
- Dust Emissions Management Plan
- Habitats Risk Assessment
- Supporting Drawings

2.0 PROCESS CONTROLS / ACTIVITIES

2.1 Permitted Wastes and Quantities

2.1.1 The maximum quantity of waste to be accepted at the Glass Waste Activity per year will be 75,000 tonnes. The maximum quantity of C, D & E wastes accepted per year will be 50,000 tonnes. A full list of wastes to be permitted at the facility is presented in **Appendix SS2**.

2.1.2 A list of maximum storage capacities is presented in **Table SS2**, below. The maximum quantity of waste to be stored on site at any one time will not exceed c. 20,000 tonnes.

2.2 Waste Acceptance

2.2.1 All commercial and industrial waste collection and transfer enquiries received from customers will be handled by Stacey Processing's Waste treatment team. This team will collate all the necessary pre-acceptance information, including details of the waste producer and waste characterisation details. Only once all the necessary information has been collated and shown to conform to the site permit will the customer and the site staff be notified that the wastes can be delivered. Details of the wastes that will be delivered will be forwarded to the site weighbridge operator ahead of delivery to the site.

2.2.2 The indicative operational layout for the site is shown in **Drawing No.: SPL1000/08/03.**

2.2.3 Following Pre-Acceptance checks, all waste deliveries will access the site via a junction off Hopton Via Gellia that also provides access to the adjacent quarry. Waste delivery vehicles entering the site will be directed over a weighbridge where transfer and consignment notes are deposited, and the vehicle is weighed. A visual inspection is carried out by the Weighbridge Operative prior to the load being directed to appropriate tipping area within the site premises for unloading.

2.2.4 All materials are received, inspected, accepted or rejected and recorded in accordance with the site's Management Plan. All operatives on site will have knowledge of the Environmental Permit and on the types and forms of waste accepted and prohibited at the facility.

2.2.5 During the waste acceptance procedures, records will be kept at the site office of the following:-

- Date and time of waste deliveries
- Waste quantities
- Waste type being delivered to the site
- The origin of the waste being delivered
- The name of the company and their representations (if applicable) delivering each load of waste and vehicle registration number.

2.2.6 During the visual inspections, an appropriately trained staff member will determine the basic characteristics of the waste to ensure it accords with the pre-acceptance paperwork, as well as the permitted waste types and quantities on site.

2.2.7 Once the load has been deposited in the appropriate storage area, a further inspection will be made by the Site Operations Manager, Technically Competent

Manager (TCM) or a nominated deputy. If accepted, the delivery vehicle will re-enter the weighbridge to be weighed before leaving the site.

2.2.8 In the event that the waste is deemed unacceptable or legally non-compliant on inspection, the driver will be instructed to leave the site with the load. Vehicle details will be recorded in the site diary and the EA will be informed.

2.3 Activities and Limits

2.3.1 The activities that this application seek to permit include the following broad descriptions:-

- Physical treatment of wastes consisting of sorting, separation, screening, grinding, crushing and blending of waste for recovery.
- Physico-chemical treatment of wastes consisting of manual sorting, screening, washing, grading and blending of wastes for recovery.

2.3.2 Both activities will be covered by the following revised Waste Framework Directive (rWFD) Annex II waste recovery codes:-

- **R13**: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).
- **R3**: recycling or reclamation of organic substances which are not used as solvents.
- **R5**: Recycling / reclamation of other inorganic materials.

2.4 Process Flow

2.4.1 Process flows diagrams for each process line are presented in **Appendix SS1.**

2.5 Waste Storage & Treatment

2.5.1 Following the successful completion of the waste-acceptance checks, incoming non-hazardous waste will be directed to the appropriate storage areas located across the site. The glass wastes will be stored in the area surrounding the dryer located in the western section of the permitted site. The C, D & E waste will be directed to the external stocking areas located in the northern section of the permit site.

Glass Treatment

2.5.2 The glass waste will be moved by loading shovel into the dryer. The dryer comprises an electrically driven rotary flow dryer, with heat generated by a gas oil fuelled Sacke burner in which the hot exhaust gases flow through the dryer drum and come into direct contact with the waste materials.

2.5.3 The dried glass waste is then screened into fractions above and below 8mm.

2.5.4 The <8mm fraction is transferred for temporary storage pending crushing/grinding to produce various grades of shot-blast. The shot-blast product is then bagged (various sizes) and stored onsite awaiting transportation to customers.

2.5.5 The >8mm glass then is sorted by colour and transferred to the relevant 50 tonne hopper to await transfer off site. The larger than 8mm fraction will then the screener via a sequence of gravity to separate the glass and any of the residual fractions. The residual fractions will be temporarily stored in 50m³

capacity engineer bays pending transfer offsite for disposal/recovery. The glass fractions will be conveyed to the glass sorting building where the glass will be sorted by colour (brown and green/clear) via one of two optical sorting lines. The sorted glass from each line is subsequently conveyed to 3No. 50 tonne capacity storage silos/hoppers pending transfer off-site to glass re-processors.

Construction, Demolition and Excavation Waste Treatment

2.5.6 Prior to treatment all C,D & E wastes will be stored in open stockpiles located in the northern section of the site.

Physico-chemical Treatment (Wash Plant)

2.5.7 C, D & E waste with a mixed particle sizes will be treated through an electrically driven mechanical wash plant, which sources water from an onsite pond. The water quality within the wash system is monitored closely to ensure it is suitable (See **Section 3.3**).

2.5.8 The wash plant will utilise this water to separate the mixture of particle sizes, produce various grades of sand, washed gravel and silt, whilst removing any potential organic and non-inert fractions.

2.5.9 The wash water system is fully enclosed with process waters from the wash plant being recirculated and reused. Only small amounts of water from the pond are used to top up the system as required.

2.5.10 The process wash waters/sludges will be treated using flocculants to induce initial gravity-based separation of the liquid and suspended solid content (e.g. thickener tanks) ahead of entering a press filter where the moisture content of the filer cake is typically reduced to below 30%. The waters removed by the filter press will also be recycled.

2.5.11 The pond collects water from rainfall and discharge from the site drainage system. It is lined with impermeable clay to minimize the risk of contamination leaching into groundwater, which is regularly inspected and maintained to ensure it does not leach water.

Physical Treatment

2.5.12 Waste with a lower fines content will be processed using diesel powered mechanical crusher and screener units.

2.5.13 The treated materials are subsequently transferred by a loader to sheltered engineered bays or external open storage (>3mm particle sizes only) pending use in onsite activities (e.g. roadstone coating) or sold on as secondary aggregates to external customers.

Site Storage

2.5.14 The maximum capacity of each of the storage bays as well as the maximum storage durations are summarised in **Table SS1**, below.

Table SS1: Maximum Storage Bay Capacities and Storage Duration Periods

Waste Description	Maximum Storage Capacity (m^3)	Maximum Storage Capacity (tonnes)	Maximum Storage Period
Glass Waste	1,900	3,000	6 months
C, D, & E Waste	8,500	15000	3 Years
Residual waste	150	150	1 month

2.5.15 The waste storage and treatment areas and are shown in **Drawing No.: SPL1000/08/03**.

3.0 EMISSIONS CONTROL & MONITORING

3.1 Introduction

3.1.1 An effective system of management techniques will be employed at the site to ensure there are no potential fugitive or uncontrolled emissions that could cause environmental concern. An Environmental & Accidents Risk Assessment is provided with this application (*Doc. Ref: SPL1000/07)*

3.2 Emissions to Air (excluding odours)

Emissions Control

3.2.1 There is one point source emission to air associated with the facility. The glass waste dryer is heated by burning OpenFlame Low viscosity burner fuelled by gas oil. This is for open furnace direct flame applications. Once the exhaust gases have passed through the burner they are directed through a bag filter prior to discharge to air via a 10m high, 1.1m diameter flue. (Discharge Point 'A1' – see **Drawing No. SPL1000/08/03**). The bag filter has been designed to achieve a particulate emission limit concentration of 50mgN/m³. The dryer is currently regulated by the Local Authority (Derbyshire Dales District Council) under Environmental Permit EPR/108/3.1/B **(Appendix SS5)**.

3.2.2 The facility will accept and process wastes that have the potential to generate dust, fibres or particulate emissions. Processed waste with a particle sizes of <3mm will be stored in sheltered bays to minimise wind whipping. Externally stored wastes with any a <3mm content will be subject to wetting of the stockpiles by bowser using water sourced from the onsite pond.

3.2.3 In the unlikely event that dust levels become problematic, procedures are in place to address this. Site personnel will use suitable Personal Protective Equipment (PPE). The operator owns a mechanical sweeper which is utilised daily on all road surfaces to prevent the build-up of potentially dusty material. Similarly, good housekeeping will be conducted within the site buildings to ensure that the build-up of potentially dusty material which may be disturbed and scattered. A site speed limit of 10mph will also be enforced to reduce the risk of dust suspension from vehicles wheels.

3.2.4 Potentially problematic loads will not be accepted at the weighbridge or reception area. Hauliers and customers will be instructed to ensure appropriate containment is in-place for certain wastes should problems persist.

Emissions Monitoring

3.2.5 Environmental Permit EPR/108/3.1/B (**Appendix SS5**) requires that the dryer exhaust flue is monitored annually for particulates. A copy of the most recent MCERTs emissions testing report for the dryer is included in **Appendix SS6.**

3.2.6 Visual inspections for evidence of any significant emissions of dust will be carried out continuously by operational staff and daily by the site management or other nominated persons. Meteorological conditions and any emissions to air will be recorded by the TCM or responsible person should the TCM be off-site.

3.2.7 All measures taken to ensure any impact relating to emissions to air is minimised are presented in the Dust and Emissions Management Plan (DEMP) (*Doc. Ref.: SPL1000.09)*.

3.3 Emissions to Water

Emissions Control

3.3.1 There are no point source emissions to surface water or groundwater associated with the permitted activities.

3.3.2 All the surface waters from the permitted site drain into the sealed drainage system. This water is collected in a sump, and pumped into the surface water pond when full. The operator now proposes to implement a 20,000L interception tank with isolation valve after this sump, which will collect water prior to discharge.

3.3.3 Water within the interception tank will be checked daily, and prior to discharge into the pond and, if pollution is identified, the water will remain isolated so that it can be removed for further treatment. This ensures that potential emissions will be captured to protect the condition of the underlying soils and strata, protected species, groundwaters, and surface waters from any leaks and spills of potentially polluting substances.

3.3.4 Any pipework or infrastructure related to the washing system is inspected daily for leaks. Leaks will be repaired as soon as practicable, and washing will not be carried out until work is complete.

3.3.5 The integrity of the engineered surfaces and drainage systems will be inspected periodically. Any damaged area will be assessed to determine if any pollution of the land will have occurred and a record maintained in the site diary.

3.3.6 The pond is lined with impermeable clay to minimize the risk of contamination leaching into groundwater. The clay lining is regularly inspected and maintained to ensure it does not leach water.

3.3.7 Spills or leaks onsite are highly likely to be contained by the sealed drainage system. Nevertheless, spill kits will be available site wide to absorb leaks whilst operations are halted.

3.3.8 To minimise the risk of hydraulic / fuel spillages and leaks, resident site vehicles / plant are checked and serviced at manufacturer recommended intervals. This is combined with daily checks of plant to enable any defects to be reported to the TCM for resolution.

3.3.9 Fuel / oil to be used for site plant will be stored in a bunded double skinned tank with a capacity no less than 110% of the primary containment tanks. Regular inspection of the integrity of this tank will be conducted to ensure the risk of any spills or leaks is as low as possible.

3.3.10 As a result of the nature of the wastes accepted at the site, there should be minimal liquids arising provided the load is not contaminated. Any load that generates liquid on initial deposition will be transferred immediately to the vehicle of origin or the non-conformance skip for removal to a suitably permitted facility within the shortest practicable time. The non-conformance/quarantine area will comprise a 12m x 4m covered bay, the location of which is shown in **Drawing No.: SPL1000/08/03**.

Emissions Monitoring

3.3.11 The point of discharge of the site drainage system is visually inspected daily, and prior to discharge, to ensure that it is free from contamination (e.g. excessive suspended sediment, hydrocarbons, odours or unusual colour).

3.3.12 If the water within the drainage system is deemed to be of unsuitable quality the isolation valve will remain closed, and the water will be removed offsite for treatment. The cause and/or a solution will be ascertained as soon as practicable.

3.3.13 The integrity of the engineered surfaces and drainage systems will be inspected periodically. Any damaged area will be assessed to determine if any pollution of the land will have occurred and a record maintained in the site diary.

Process Waters

3.3.14 The non-hazardous/uncontaminated nature of the soils and aggregates to be treated by the wash plant, coupled with the addition of top-up waters for residual loses are unlikely to result in generation of grossly contaminated process waters. Materials to be submitted for the treatment process will have already been fully characterised via the waste acceptance criteria for the site. Nonetheless, process water will be sampled and analysed monthly for a suite of determinands such as TPHs and Metals. This will inform the operational decision as to when to replace the water in the system.

3.4 Odour

Emissions Control

3.4.1 The proposed waste types to be accepted at the facility will not have a significant putrescible content and therefore it is not considered likely that a high risk of odour will be presented.

3.4.2 Where possible, a visual inspection of each load is carried out at the weighbridge by the Weighbridge Operative. Third party vehicles are further scrutinised as it would be assumed the pre-loading criteria may not have been adhered to. After deposit in the tipping area, a further inspection is carried out by a Site Operative. At each stage of these checks if waste is deemed to be highly odorous it will be rejected from the facility. No malodours wastes will be accepted at the site.

3.4.3 If waste is considered unacceptable because of an odour rejection, the delivery vehicle will be re-loaded and sent off-site. If the waste has already been deposited, the vehicle details will be noted and will be requested to return to site to collect the unacceptable waste. A Waste Rejection Note will be issued in both cases. If reloading is not possible, the waste will be transferred to a designated, enclosed quarantine container and removed to a suitable facility as soon as reasonably practicable

Emissions Monitoring

3.4.4 The TCM / Supervisor or other nominated personnel will carry out weekly olfactory monitoring around the site and its boundaries to determine if any wastes present at the site are generating significant odours.

3.4.5 A general daily odour inspection will be conducted. All staff are required to report to management should there be a significant odour. The results and

meteorological conditions will be recorded in the site diary and kept in the offices.

3.5 Noise

Emissions Control

3.5.1 The site operations will generate high levels of noise and have potential to cause nuisance. Noise is mitigated by the ring of woods surrounding the site, the topography of the surrounding screening berm and the nearest residential dwelling being ~400m away. All site plant and vehicles will undergo a regular programme of maintenance and servicing in line with manufacturers recommendations.

3.5.2 It should be noted that the surrounding land uses primarily comprise industry, commerce and agriculture, none of which are sensitive receptors to noise. The closest residential receptor, Arm Lee Farm, is located c~400m to the north of the site boundary and a further two residential properties, Eniscloud Meadow Farm and Denewood Farm lie c. 500m southwest and 590m south of the site boundary respectively. Therefore, residential properties in the locality are situated at a significant intervening distance from the site whereby noise would be unlikely to affect them.

3.5.3 All mobile plant will be fitted with low octave reversing alarms and exhaust silencers.

3.5.4 All plant and equipment will be maintained in accordance with the manufacturer's recommendations.

3.5.5 It is therefore considered that potential noise emissions are unlikely to generate complaints at nearby sensitive receptors.

Emissions Monitoring

3.5.6 Given the nature of the proposed operations and the proximity of potential noise sensitive receptors, it is not necessary to undertake instrumental noise monitoring.

3.5.7 The Site Operations Manager (or nominated deputy) will undertake daily review of the noise levels being generated by all mechanical plant/equipment. Noise that is likely to lead to unacceptable emissions off site will be noted and a record made. An attempt will be made to identify the source of the noise and ensure it is ameliorated or otherwise removed off site. A record will be made of such incidents and the corrective actions taken.

3.6 Scavengers, Insects and Other Pests

Emissions Control

3.6.1 None of the proposed permitted wastes putrescible in nature and, therefore, provide a very low potential for attracting scavengers and pests.

3.6.2 The internal storage and handling of wastes will serve to reduce the risk of scavengers, insects and other pests from being attracted to the site. Good housekeeping protocols will also aid in reducing the risk of pests and scavengers being attracted to the site by ensuring that waste residue does not build up.

3.6.3 Should insects posing a nuisance be observed at site, insecticides offering rapid knock-down and long-term treatment shall be utilised.

3.6.4 A record of all incidents related to pests are kept in the site diary.

Emissions Monitoring

3.6.5 Due to the low risk of scavengers and pests being attracted to the site, monitoring of the site for signs of infestations of scavengers, insects and other pests will be conducted periodically. Furthermore, site operatives will be told to report any signs of infestations that they observe while carrying out their daily tasks. If any evidence of such infestations are observed, this will be noted and reported to the Site Operations Manager, TCM or nominated deputy who will action control measures to rectify the issue as soon as practicable. Any incidents will be noted in the Site Diary.

3.7 Litter

Emissions Control

3.7.1 All wastes accepted and processed at the site are only deposited at their respective bays and stockpiles. The residual wastes may pose a potential for litter, but they will be kept in a concrete bay with a roof, which will mitigate potential for washout or wind carrying the lighter material.

3.7.2 All vehicles delivering waste to site will be fully enclosed or sheeted to prevent littler being blown from the vehicle.

3.7.3 Should any material be carried beyond the site boundary, it will be collected immediately. Any incidents will be recorded in the site diary.

Emissions Monitoring

3.7.1 Due to the low risk of litter emanating from the site, dedicated monitoring for litter is not deemed necessary at the site. The site operatives and staff will report any signs of litter immediately with daily site checks and inspections also carried out. In the unlikely event that litter is observed, actions will be taken immediately to identify the source, conduct litter picking and record the incident in the Site Diary.

3.8 Mud and Debris

Emissions Control

3.8.1 An Environmental and Accidents Risk Assessment (EARA) *(Doc. Ref.: SPL1000/07)* has been carried out to support the management of the waste activities. This assessment identified a low risk that any mud or debris will be transferred to the highway given the provision of engineered surfaces throughout site and that waste operations are carried out within a building.

3.8.2 The operator owns a mechanical sweeper which is utilised daily on all road surfaces to prevent the build-up of potentially dusty material.

3.8.3 All waste storage and treatment areas, service areas and roads immediately surrounding the facility will comprise of hard engineered surfacing which will be maintained to prevent rutting and minimise the opportunity of mud and debris being tracked onto public road networks.

3.8.4 All site areas and public highway networks immediately outside the facility's boundary will be subjected to general housekeeping and materials transit measures. A road sweeper is present on site.

Emissions Monitoring

3.8.5 In order to ensure the road cleaning methods are adequate, a daily inspection of the public highway will be undertaken by the TCM / Supervisor or other trained personnel as directed by the TCM at times when the facility is open for receiving or dispatching wastes. Details of the inspections and any remedial measures taken will be recorded.

3.8.6 All measures taken to ensure any impact relating to mud and debris is minimised are presented in the Dust and Emissions Management Plan *(Doc. Ref.: SPL1000/09).*

4.0 MANAGEMENT SYSTEMS

4.1 Environment, Health, Safety and Quality System

4.1.1 The Facility will operate under an effective system of management currently under development by the operator, Stacey Processing Ltd. Although the system is not externally certified, the company may investigate options for certification in the future. Health and Safety risk assessments have been carried out of the site to ensure compliance with relevant legislation.

4.1.2 Audits and inspections will be conducted to a suitable standard to meet the requirements of the management system and performance will be reported annually to the EA as per the requirements of the Environmental Permit.

4.1.3 Environmental issues will be considered when purchasing items of plant and when design changes are being undertaken at the facility. These considerations will be documented.

4.1.4 Records will be kept of all items required by the Environmental Permit, other legislation and operating procedures.

4.2 Competence

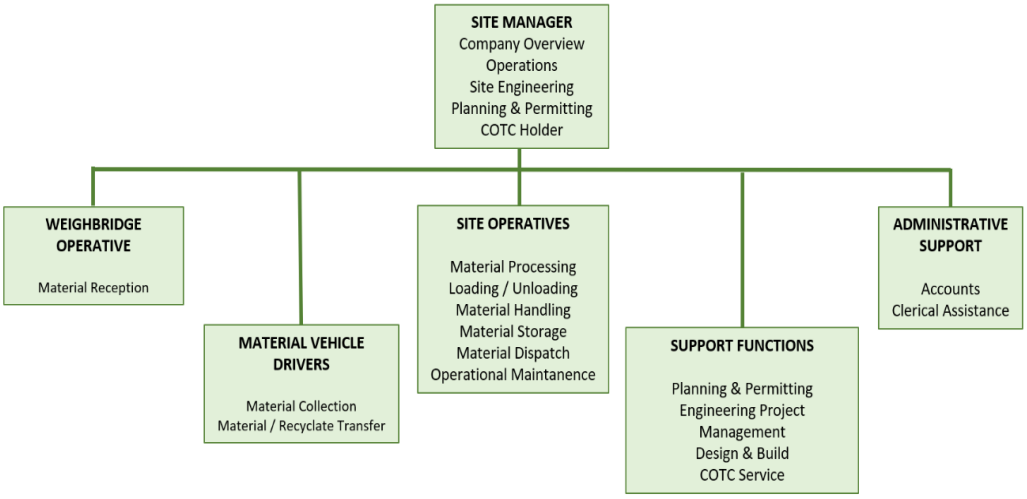
4.2.1 Technical competence for the waste facility will be provided via the WAMITAB Certification Scheme. Employees are selected based upon relevant experience within the waste management and recycling industry.

4.2.2 In order to comply with the regulatory requirements as stated in the Environmental Permitting Regulations, Stacey Processing propose to provide experienced person/s with the appropriate technical competence qualifications to manage the facility. Evidence of their qualifications is attached in **Appendix SS3.**

4.3 Staffing

4.3.1 The likely staffing arrangements are outlined in the company organogram as shown in **Figure SS1**.

Figure SS1: Management Structure for Ryder Point Works



4.3.2 **Appendix SS4** outlines the roles and responsibilities of staff employed within the organisation.

4.4 Training

4.4.1 Any new employees are given full induction training by the Site Operations Manager or other appropriately qualified person(s) as appointed by the Site Operations Manager.

4.4.2 Additionally, staff and operatives will receive training to ensure they can perform their role competently.

4.4.3 The assessment of competences of staff is made by the Site Operations Manager or other appropriately qualified person(s) on an ongoing basis. All staff are trained to ensure that they are competent to undertake their respective duties. Particular attention is given to familiarisation of staff with the Environmental Permit for the site, the potential emissions from the site and the prevention of accidental emissions. Training will be tailored to individual requirements.

4.4.4 An induction and personal training plan is developed for each individual and is regularly updated to reflect staff needs and skills.

4.5 Operating Procedures

4.5.1 A number of specific standard operating procedures which cover the onsite activities at the proposed waste operation have been developed as it currently operates under waste permit exemptions. Copies of these standard operating procedures are held by Stacey Processing. These will be periodically reviewed and updated where deemed necessary.

4.6 Maintenance Procedures

4.6.1 A documented maintenance schedule is developed in accordance with equipment suppliers and manufacturer's recommendations. Any plant that is used will be hired with a full repair/maintenance contract (which includes oils, greases etc) incorporating specified response times to reduce downtime. An inspection regime is developed for each piece of plant in order to visually inspect condition and identify immediate repair requirements.

4.7 Records

4.7.1 A record of the types and quantities (in tonnes) of wastes received and removed from the facility will be maintained. A summary of the types and quantities of wastes deposited at the site and removed from the site will be provided to the EA quarterly in an agreed format. All Duty of Care documentation in relation to waste movements will be kept for 5 years.

4.7.2 The following significant events at the facility will be recorded, as detailed below:

- Maintenance;
- Breakdowns;
- Emergencies;
- Problems with waste received and action taken;
- Facility inspections;
- Attendance of technically competent management at the facility;
- Despatch of records to the Agency;
- Severe weather conditions;
- Complaints received;
- Visitors to the facility;
- Pest or vermin incidents; and

- Rejected loads and the reason for rejecting the load.

4.7.3 The Site Operations Manager or nominated person will maintain a record of all the above information in the site log or on inspection forms, as appropriate. Records relating to significant events will be kept for up to 6 years, or where involving off site environmental effects or pollution of land or groundwater until permit surrender.

4.7.4 All records and copies of inspection forms will be kept at the facility at all times and will be available for inspection at all reasonable times by any authorised officer of the EA.

4.7.5 The facility records may be kept either as:

- Hand generated log;
- Computer generated hard copies; or
- Computer permanent storage media.

4.7.6 To ensure the security of records they will be housed in either locked containers or kept in offices that shall be locked when not attended.

4.7.7 Records will be disposed of in accordance with company policy, which shall ensure an appropriately secure method e.g., shredding and recycling, where feasible.

4.8 Visitors

4.8.1 Persons visiting the facility will be required to report to the site office. A record of the time and reason for their visit will be logged in the signing-in book. Visitors entering the working areas will be briefed and inducted with respect to facility safety and accompanied where necessary.

4.8.2 All visitors will be made aware of the requirement for Personal Protective Equipment (PPE). No person will be allowed entry to the facility without the correct protective equipment. The facility employees are responsible for the Health and Safety of all visitors and will ensure that they are given sight of a copy of the Health and Safety Plan and are made aware of any potential threats to their safety or welfare.

4.8.3 There will be additional induction requirements for contractors visiting site that are providing a service or undertaking works such as maintenance. A permit to work system will be employed for more hazardous maintenance activities to ensure compliance with health and safety requirements.

4.9 Site Inspections and Audit

4.9.1 Every working day, site inspections will be conducted of the waste operation working areas. The facility shall be inspected on every working day by the Site Operations Manager or other nominated persons for defects in plant, equipment or structure or in any working practice that may affect satisfactory compliance with the Environmental Permit. Inspections shall be undertaken by staff suitably qualified and/or experienced in the day-to-day operation of the facility. This will include the following inspection points:

- Waste storage levels;
- Waste type storage area separation;
- Cleanliness;
- Site emissions;

- Leakages/Spillages;
- Monitoring data (where relevant);
- Stationary plant condition
- Mobile plant condition; and
- Integrity of site surfacing, drainage systems and security provisions, where applicable.

4.9.2 The above-described daily monitoring will aid in the identification of significant emissions, including noise, dust and odour. This aspect is very important for the proposed Waste Operation given the site's proximity of other industrial activities, including a carbon processer and a quarry. The completion of these daily inspections will allow for the sources of any recorded emissions to be located, identify the responsible party and hence attribute responsibility for remedial action.

4.9.3 Should an on-site problem be identified, the Site Operations Manager or nominated person will arrange for the appropriate mitigation technique to be applied as soon as is reasonably practicable.

4.9.4 Should a fugitive emission source be identified as being outside the Environmental Permit Boundary of the proposed site, then the Site Operations Manager/TCM or appointed deputy will make contact with the operators of the facility containing the emission source and inform them accordingly, where this is able to be identified.

4.9.5 Records shall be kept of daily inspections and shall be made available for inspection as reasonably required by authorised officers of the EA. Any defects shall be rectified promptly.

4.9.6 In addition, under the environmental management system, the site is subject to both internal and external audit. Copies of the audits will be kept in the site office.

4.10 Site Security

4.10.1 All reasonable precautions are taken to prevent unauthorised access to the site.

4.10.2 Access to the facility will be via a metalled road Hopton Via Gellia east of the site. There is a security gate at the site entrance, adequate fencing is provided to prevent unauthorised access. In addition to this, CCTV will be utilised to monitor the site. Exit from the site will be to the west, onto Hopton Via Gellia.

4.10.3 Furthermore, the site will be locked outside of operational hours to prevent unauthorised access.

4.10.4 The integrity of the site boundary, entrance and exit gateway as well as perimeter structures are inspected on a weekly basis. Any damage to the integrity of the boundary, gates or any other security structure, where practicable, will be repaired by the end of the working day. If it is not possible to make repairs within a working day, temporary repair measures will be implemented. Final repairs will be carried out within 7 working days of the damage being detected or any other such period as agreed in writing with the EA. All damage and repairs (temporary or permanent) are recorded in the Site Diary.

4.11 Site Identification Board

4.11.1 A site identification board is attached to the frontage of the site detailing the following information:

- The permit holder's name (company name) and permit number;
- An emergency contact name and the permit holder's telephone number;
- A statement that the site is permitted by the Environment Agency; and
- The Environment Agency incident hotline 0800 80 70 60

4.11.2 The site identification board will be inspected on a weekly basis and any damage repaired within 7 working days for minor repairs and for major repairs at a timescale agreed with the Environment Agency. Details of any damage and repairs undertaken are recorded in the Site Diary.

4.12 Complaints

4.12.1 Any complaints relating to the facility will be managed as follows:

- Details of the complaint and the complainant will be logged in the Site Diary and electronically.
- The complaint will be investigated. Corrective actions and preventative actions will be undertaken where the source of the complaint can be identified and is attributable to activities undertaken at the facility.
- The details of the action taken will be reported back to the complainant. This will include cases where the complaint is unsubstantiated i.e. the complaint fails to be linked to any activity occurring at the facility. All investigate works and compliant outcomes will be recorded in the Site Diary.

4.13 Staff Welfare Facilities

4.13.1 Staff rest and wash facilities are situated adjacent to the site offices.

4.14 Non-Compliances

4.14.1 The weighbridge operative involved in waste acceptance checks will be trained to effectively identify and manage non-conformances in the loads received, complying with EA Guidance and any permit conditions.

4.15 Health and Safety

4.15.1 The company recognises the importance of Health and Safety for both its staff and visitors to its facility. The company will develop appropriate Health and Safety practices for the site.

4.16 Accidents / Incidents / Non-Conformances

4.16.1 The likelihood and consequences of accidents and associated preventative / mitigating measures are presented in the Environmental and Accident Risk Assessment for the site *(Document Reference: SPL1000/07).*

4.16.2 Stacey Processing has written procedures for handling, investigating, communicating and reporting of potential non-compliances and environmental complaints and associated remedial actions. In summary, any non-compliances identified onsite will be reported to the EA within 24 hours. Details of the non-compliance and corrective actions will be recorded on appropriate recording

forms and held electronically for a period no less than two years. Any records of non-compliance will be archived until Environmental Permit surrender.

4.16.3 Daily site inspections will be conducted by the Site Operations Manager or other nominated representatives for defects in plant, equipment or structures or in any working practice that may affect satisfactory compliance with the Environmental Permit. Inspections shall be undertaken by staff suitably qualified and/or experienced in the day-to-day operation of the facility. The main points of inspection shall include:

- Waste storage levels
- Waste type storage area separation
- Cleanliness
- Site emissions
- Leakages / Spillages
- Monitoring data (where relevant)
- Plant condition
- Integrity of site surfacing, drainage systems and security provisions, where applicable

4.16.4 Should a problem be identified, the Site Operations Manager will arrange immediate repair or other appropriate remedial action.

4.16.5 Records shall be kept of daily inspections and shall be made available for inspection as reasonably required by authorised officers of the EA. Any defects shall be rectified as soon as reasonably practicable.

4.17 Climate Change Adaption Planning

4.17.1 Following the 'Non-hazardous and inert waste treatment: examples for your adapting to climate change risk assessment' (Updated 17 May 2023) from the Environment Agency, the primary potential risks to the site concerning climate change are identified as follows:

- Summer daily maximum temperature
- Daily extreme rainfall
- Average winter rainfall
- Drier summers
- Storms

Summer daily maximum temperature

4.17.2 Higher summer maximums may bring a greater potential for fire if the temperature exceeds the rated working temperature of the equipment in operation at the site, in particular electrical equipment. The management plan must ensure the equipment is sufficiently shaded or cooled for operation.

4.17.3 They will also cause a higher likelihood of dust emissions from processes, stockpiles and site roads. These can be mitigated by increased or adapted dust suppression techniques which will be included in the management plan.

4.17.4 Increased risks of drought may impact the water supplies for the site. This will affect the wash plant and the dust suppression systems in place. As a result, reduction of the wash plant throughput and alternate dust suppression measures will need to be planned and other methods of retaining and conserving water can be sought.

4.17.5 Wildfire risk will increase with the increased temperatures. The management system needs to account for how the potential ignition sources will be monitored and how this may affect the surroundings of the site.

Daily Extreme Rainfall

4.17.6 Increased extreme rainfall requires potential mitigation for any future events that may overwhelm the drainage systems at the site and cause the surface water pond to overflow.

4.17.7 There also needs to be consideration for the potential washout of uncovered stockpiles of material that may be affected by extreme rainfall. Adequate plans for the storage of materials that may be washed away need to be considered, although most sub-3mm materials are stored undercover at the facility.

Average Winter Rainfall

4.17.8 Increased average winter rainfall may cause the surface water pond to overflow. The waste materials stores in the vicinity of the pond present a low risk to associated flood waters. Monitoring and review of the capacity of the pond should be reviewed for future potential for overtopping and improvement measure implemented as appropriate.

Drier summers

4.17.9 Increased risks of drought may impact the water supplies for the site. This will affect the wash plant and the dust suppression systems in place. As a result, reduction of the wash plant throughput and alternate dust suppression measures will need to be planned and other methods of retaining and conserving water can be sought.

Storms

4.17.10 The increased likelihood of storms brings a greater risk of high winds that may be damaging to the site infrastructure and create conditions for fugitive emissions, especially dust. However, most stockpiles with a sub-3mm particle size will be within engineered bays and adequate water supply will be available to temporality manage any increased risk from dust emissions until any repairs can be instigated. The associates risk from storms is therefore considered very low.

5.0 ACCIDENTS & THEIR CONSEQUENCES

5.1 Emergency Planning

5.1.1 An Environmental and Accidents Risk Assessment (EARA) *(Doc. Ref.: SPL1000/07)* has been prepared in support of this application. The matrix identifies potential hazards at the facility, the likelihood and consequence of an accident or emergency relating to hazards, and the risk management measures that will be put in place to ensure that risks are reduced to an acceptable level.

5.2 Emergency Contact

5.2.1 In the event of any significant environmental emergency / incident, a representative of Stacey Processing will notify the EA by telephone immediately but first having due regard for the incident at hand and any remediation actions required to ensure the safety of site personnel and the immediate environment.

5.2.2 Details of any environmental incident will be confirmed to the EA in writing by e-mail on the next working day after identification of the incident. This confirmation will include: the time and duration of the incident, the receiving environmental medium or media where there has been any emission as a result of the incident, an initial estimate of the quantity and composition of any emission, the measures taken to prevent or minimise any further emission and a preliminary assessment of the cause of the incident.

5.2.3 Any incident notified to the EA will be investigated and a report of the investigation sent to the EA. The report will detail, as a minimum, the circumstances of the incident, an assessment of any harm to the environment and the steps taken to bring the incident to an end. The report will also set out proposals for remediation and for preventing a repetition of the incident.

5.3 Control of Fires

5.3.1 No waste will be burned within the confines of the site boundary. All fires within the facility will be treated as a potential emergency and dealt with accordingly. Fires may occur in relation to:

- Plant failure – fixed or mobile plant fires
- Within waste in delivery vehicles
- Within waste storage areas

5.3.2 If the fire can be controlled without endangering operatives, appropriate actions will be undertaken using available fire-fighting equipment. Fires will be tackled by a minimum of two facility operatives.

5.3.3 In the event that a large fire occurs at the facility, the following actions would be undertaken:

- Person(s) discovering the fire will raise the alarm.
- Report the incident to the TCM / Supervisor.
- All site personnel and visitors will be accounted for and evacuated to a safe location.
- Contact the emergency services and state the nature of the incident.
- Ensure access is clear for the emergency services but prevent access to the facility from anyone else until the emergency is over.
- Follow all instructions given by the emergency services.
- The EA will be informed forthwith of any fires that occur at the facility.

5.3.4 All buildings are provided with smoke alarms and a dedicated fire alarm with audible and visual signals in the key building areas. Out of hours remote third party monitoring and CCTV will also be implemented. All mobile plant vehicles will be equipped with fire suppression.

5.3.5 All fire-fighting equipment at the facility will be clearly marked and tested, at appropriate intervals, to confirm their suitability and functionality. Site personnel will be made aware of the locations of all fire-fighting equipment and will be trained in their correct use.

5.3.6 A record of the occurrence of a fire will be maintained in the site log, along with any actions taken. An Incident and Accident Report will be completed by the TCM / Supervisor.

5.3.7 Following approval by the fire services and / or TCM, any residues from the fire will be disposed of accordingly at a suitable permitted waste management facility.

5.4 Explosions

5.4.1 In the unlikely event that materials with explosive elements are discovered within a waste delivery that has already been accepted, the following action would be taken:

- Contact the TCM / Supervisor or in their absence, the nominated deputy.
- Check that all site personnel and visitors are accounted for and are moved to a safe location.
- Contact the emergency services and state the nature of the incident (including whether any fires have occurred).
- Follow all instructions given by the emergency services.
- If injuries have occurred, medical assistance will be called.
- No further wastes will be accepted at the facility until the TCM / Supervisor has given authority.
- The EA will be informed forthwith of any arisings of explosive materials or any explosions that occur.

5.4.2 Once the emergency is over and the emergency services have declared that the area is made safe, an incident report shall be completed. A written account of the incident will also be forwarded to the EA no later than 14 days after the incident.

5.5 Flooding

5.5.1 The Environment Agency's flood zone mapping shows that the site lies within a Flood Zone 1 which is described as having a 'low probability' of flooding (less than 1 in 1,000 annual probability of river or sea flooding). The nearest area of flood risk is located approximately 1500m north and is designated at a Flood Zone 3.

5.5.2 The following actions may be taken by the Site Operations Manager or other designated person where flooding from any source presents a risk to the site:

- If possible, all stocks of chemicals / fuel will be removed from the risk areas.
- All plant will be removed from the area at risk.

5.5.3 Facility operatives will not attempt to enter the flooded area until a risk assessment has been undertaken or the flood has subsided.

5.6 Control of Leaks and Spillages

5.6.1 Waste will not be accepted that is liquid or sludge. Any spills or leaks from wastes will be captured by the sealed internal drainage system which is directed to a sump, pumped and tankered for transfer off-site to an appropriate facility.

5.6.2 Daily visual inspections of concrete surfaces for signs of ponding, overflowing onto exposed surfaces or ineffective drainage will be conducted. Facility operatives will report any such incidents to the TCM / Supervisor. Should the concrete surfaces show signs of ineffective drainage, no further use will be permitted until repairs to concrete or drainage systems are undertaken.

5.6.3 Above ground storage tanks, drums and bunded areas will be inspected weekly whilst the facility is operational. In the event of a spillage, facility operatives will inform the TCM / Supervisor who is responsible for assessing the situation and deciding on the most appropriate actions to be undertaken.

5.6.4 All necessary measures will be taken to contain any spillage or discharge by means of suitable material and equipment. The actions undertaken will depend on the size of the spillage, the location of the spillage in relation to sensitive receptors and the nature of the spilled material.

5.6.5 Where spillages of dry wastes occur, these will be cleared by either manual or mechanical means, for example handpicking, sweeping or shovelling, dependant on the size and location of the spillage.

5.6.6 Minor spillages of liquid will be contained using spillage kits or any suitable readily available absorbent material, e.g. chipped wood product. This material will be disposed of in a manner appropriate to the type of material absorbed. Materials from used from spill kits will be replaced. Should a significant spillage occur on an external non-waste storage area, the penstock valve will be closed to prevent the discharge of the spilled material to surface water. The spillage will be contained as much as possible and cleaning will be conducted.

5.6.7 If a major spillage of liquid occurs the following actions will be undertaken, where appropriate:

- Report the occurrence to the TCM / Supervisor immediately;
- Trained facility operatives will take immediate action to try and contain the leak where it is safe to do so.
- If it is safe to do so, the cause of the spill or leak will be isolated and / or moved to a bunded area.
- If the liquid spillage is large, inert material such as clay or sandbags will be used to make a temporary containment bund to prevent pollution of any surface water, land or groundwater. The TCM / Supervisor or designated person will contact the EA to discuss best practicable disposal options.
- Access to the immediate area should be restricted until a disposal/clean up solution is implemented.
- If the spillage cannot be contained using approved methods, senior management will be contacted immediately and specialist advice and help will be sought.
- If a vehicle is identified as leaking, wherever practicable, it will be stored on an impermeable pavement within a bunded area, where the spillage can be contained until such time as a repair is affected.

5.6.8 The Environment Agency will also be informed in accordance with the permit requirements of major spillages, having due regard to first take appropriate measures to deal with any emergency in hand.

5.6.9 The locations of spillage kits and other emergency equipment will be detailed within the Site Emergency Plan.

5.7 Investigation of Accidents & Incidents

5.7.1 For any accident, incident or dangerous occurrence, an 'Incident and Accident Report' will be completed by the TCM / Supervisor. All relevant details of the accident, incident or dangerous occurrence will be recorded, together with any additional statement, photographs, logs or records that may assist in the full investigation of the accident, incident or dangerous occurrence.

5.7.2 After an Environmental Incident and Emergency has been made safe, an investigation will be conducted, if necessary, by the TCM / Supervisor and other Personnel as appropriate.

6.0 REPORT CLOSURE

6.1.1 This report has outlined the proposed process controls, activities and management systems for the site, as well as the emission controls and monitoring to be conducted during the operational period of the site. Cognizance has also been given to accidents and their consequences.

6.1.2 The supporting appendices and drawings to this report are included in the following sections.