

**Environmental Permit –  
Management, Operations and Monitoring Summary**

Morris Recycling Limited  
Unit 34 Coneygree Road  
Coneygre Industrial Estate  
Tipton  
DY4 8XP

Permit number: TBC

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## Revision History

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INTRODUCTION	3
1 MANAGEMENT	4
1.1 General management	
1.2 Environmental and Competence Management System	
1.3 Site Drawings	
1.4 Site security	
1.5 Site notice board	
2 OPERATIONS	6
2.1 Permitted activities	
2.2 The site boundary	
2.3 Waste acceptance	
3 EMISSIONS AND MONITORING	6
3.1 Fugitive emissions of substances	
3.1.1 Storage areas of liquids	
3.1.2 Inspection and maintenance of containment	
3.2 Odour	
3.3 Noise and vibration	
3.4 Pests, scavenging animals and birds	
3.5 Control of mud and debris and loose waste	
3.6 Control, monitoring and reporting of dust, fibres and particulates	
3.7 Control of litter	
3.8 Leaks and spillages	
3.9 Fires on the site	
4 INFORMATION	9
4.1 Records	
4.2 Reporting	
4.3 Notifications	

## INTRODUCTION

An application has been made for an Environmental Permit for the storage and treatment activity for PVC and uPVC plastic recycling. This document is the written management system which sets out the systems that the site has in place and is a working document for staff to refer to.

The facility is currently operational and operating under waste exemptions WEX273152 and WEX363011. The site is applying for an environmental permit as the site would like to operate a hammermill on uPVC window frames which is a treatment activity not covered by an exemption and the Environment Agency is reforming exemptions meaning that the site will not be able to continue operating without an environmental permit in future years. The business extrudes the materials into pellets, for further use by PVC manufacturers into plastic PVC products.

## 1 – MANAGEMENT

### 1.1 General management

Managing Director, Andy Morris, has years of experience of operating a PVC recycling facility and he is supported by a team of trained operatives that operate the facility and trained staff that provide administration and management support. Due to the process producing pellets for use in the re-manufacture of PVC products, continuous high-quality functioning is key to ensuring a high quality pellet is produced.

All site staffs work under direct supervision of a member of staff who are knowledgeable in the process and who will be fully conversant with the permit conditions, once the permit is issued. All environmental core documents are made available immediately in the site office so it can be referenced by site staff and the Environmental Permit will be made available to staff once issued by the Environment Agency.

### 1.2 Environmental and Competence Management System

#### *Environmental Management System*

The site operates an environmental management system that complies with the Environment Agency 'Develop a Management System'<sup>1</sup>. The EMS is not externally certified.

The Environmental Permitting Regulations require all applicable waste facilities to have a written management and technical competence conditions applied.

The core documents for the environmental management system are:

- Management, Operations and Monitoring Summary
- Fire Prevention Plan
- Accident Management Plan
- Acceptance and Rejection Procedure
- Non-conformance Reporting Procedure
- Environmental Complaints Record

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<sup>1</sup> <https://www.gov.uk/guidance/develop-a-management-system-environmental-permits>

### *Competence Management System*

To satisfy the technical competence condition 1.1.1 of the environmental permit, the site is implementing a Competence Management System to the EU Skills private standard. The contract has been signed with Lloyds Register to certify the standard. The 12 month grace period to achieve certification will be applied, however EU Skill rules will be followed, including agreeing the schedule within 4 weeks of permit issue, completing stage 1 within 6 months and stage 2 within 12 months.

### **1.3 Site Drawings**

The current drawings for the site are as follows:

Drawing Title	Drawing Number
Site Location Plan	01
Environmental Permit Boundary	02
Site Infrastructure Plan	03
Site Storage and Internal Layout Plan	04
Site Drainage Plan	05
Fire Protection Plan and Fire Hydrant Locations	06
Water Pooling Plan	07
Receptor Plan 1km	08
Block Material Flow Diagram	09
Severn Trent Waste Water Map	569353-1

### **1.4 Site security**

The site has:

- external storage area - fully enclosed with a combination of 16.4ft walling, wooden railway sleepers and the main building. Entrance to the external storage area is via 1 gated entrance. The site gate is locked shut at all hours and only opened for deliveries or collections. The gate is checked daily and the boundary weekly for operational security, the results are recorded on the Daily Environmental Monitoring Reports.
- Building – half brick/half cladding built, with two roller shutter door and two pedestrian entrances, all are locked at all times
- Office area – access via one pedestrian entrance. This is locked at all times.
- The site has internal and external CCTV that covers the site 24 hours a day.

All reasonable precautions are taken to prevent unauthorised access to the site. If boundaries and gates are damaged and their integrity is impaired, they shall be repaired. Where it is not possible to make proper repairs within the working day, temporary measures will be implemented until a full repair can be arranged.

### **1.5 Site notice board**

Once the environmental permit has been issued, the site will install a notice board including all the information laid down in the EA guidance "Develop a Management System"<sup>2</sup>. The notice board will be positioned at the entrance within one month of the permit issued. The boards will be checked weekly and a record of the check made on the Daily Environmental Monitoring Report.

<sup>2</sup> <https://www.gov.uk/guidance/develop-a-management-system-environmental-permits>

## **2 – OPERATIONS**

### **2.1 Permitted activities**

The permitted activities will be listed in Schedule 1, Table 1.1 of the Environmental Permit.

### **2.2 The site boundary**

The activities on site shall not extend beyond the site boundary – see Environmental Permit Boundary Plan drawing no.02. The site boundary has been provided during permit application and will be included in a Schedule of the permit once the permit is issued.

### **2.3 Waste acceptance**

'Waste types and quantities' will be detailed in a Schedule of the permit and this Table will be used as a reference to ensure the correct wastes is received on site. The total quantity of waste applied for on the permit application is less than 50,000 tonnes per annum.

As a specialised PVC plastic and uPVC window recycling company, the site will only process and accept plastic and window frames and will reject all non-confirming material as it will impact operations, therefore the site will always conform to its permit. As our acceptance criteria is so critical, all vehicles will be checked upon delivery and the material will be visually assessed upon arrival. All customers, including new customers will be frequently reminded of the sites acceptance criteria and quality is strictly controlled.

The waste in is sourced from window fitters, window manufacturers, PVC manufacturers, metal recycling companies, Material Recycling Facilities (MRFs) and waste companies. Due to the nature of the material, this type of plastic is generally not mixed with other wastes and therefore not mixed with non-target materials upon delivery. All by products that are separated from the window i.e metal, glass, rubber is separated to a high-quality standard and removed from site onto the appropriate recyclers.

## **3 - EMISSIONS AND MONITORING**

### **3.1 Fugitive emissions of substances**

The site infrastructure and operations are managed in such a way that the risk of fugitive emissions shall not cause pollution. The following systems are in place to prevent and minimise any potentially polluting emissions:

- All waste entering the site is visually inspected before delivery. The material received is uncontaminated plastic window frames. When unloaded the material is stored on an impermeable pavement in designated areas of the external yard area. The design, construction and maintenance of the waste storage areas is such that it is capable of containing the stored material. The impermeable pavement in the storage areas are inspected on a weekly basis and any defects reported on the Daily Environmental Monitoring Report and rectified as quickly as possible.
- Inbound waste is sourced from window fitters, window manufacturers, PVC manufacturers, metal recycling companies, Material Recycling Facilities (MRFs) and waste companies and therefore the quality of the material received is clean and separated.

- All engineered hard standing areas is constructed from concrete. The nature of the storage of material ensures that the area will remain free of standing water during normal weather events.

### **3.1.1 Storage areas of liquids**

Liquid waste is not permitted on site.

All chemicals for the process are stored within the building or within appropriate bunds.

Oils and liquids for maintenance are stored in a dedicated area. Adequate spill granules are in place and available in all areas.

### **3.1.2 Inspection and maintenance of engineered containment**

All areas are inspected weekly to ensure the continuing integrity and fitness for purpose of their construction. The inspections are reported on the Daily Environmental Monitoring Report. If any damage is detected which breaches the integrity of the engineered containment so that it no longer meets the specified standard, the affected area will be isolated with immediate effect and repairs will be carried out.

### **3.2 Odour**

The material received is window frames and PVC plastics which the risk of odours is considered very low. Due to this, the site does not have an Odour Management Plan, however should any odour complaints be received, investigations would be conducted and a plan put in place as necessary.

### **3.3 Noise and vibration**

The site operations are contained within the building:

- small and large warehouse buildings - the equipment is plastic reprocessing equipment which are all low noise generating
- Hammermill building – the sorting of the window frames does involve a shredding and metal sorting process which can create noise

Noise level assessment including background noise level readings are being undertaken and from that a Noise Management Plan will be written and submitted to the Environment Agency.

All on site mobile plant and machinery complies with current legislative requirements and all company delivery and collection vehicles are similarly equipped. A Preventative Maintenance Plan is in place to ensure machinery is kept in good working order.

Any complaint will be record on the Environmental Compliant Record, investigated with a record of any likely causes noted at the time, actioned accordingly and a concluding record made.

### **3.4 Pests, scavenging animals and birds**

The wastes received on site i.e window frames and uPVC profiles do not attract scavenging animals, birds and other pests. Scavenging animals, birds and other pests are monitored weekly and reported on the Daily Environmental Monitoring Report. If there was a recorded increase in pests, an outside contractor would be employed to monitor, bait and remove any pests from the site.

### **3.5 Control of mud and debris and loose waste**

The site is immediately adjacent to the road network and no vehicles come into contact with mud on the site due to an impermeable pavement and therefore the risk of mud being carried onto the highway is extremely low.

### **3.6 Control, monitoring and reporting of dust, fibres and particulates**

Permitted waste types do not include dusts, powder or loose fibres so only a minor magnitude of risk is estimated. Any dust created by the hammermill process, albeit low, is contained within the building. All waste materials stored outside, is heavy window uPVC and thus unlikely to blow around.

Site staffs continuously undertake visual monitoring of aerial emissions. On detection or notification of visible aerial emissions that are likely to be transported beyond the site boundary, immediate action would be taken to stop the waste handling operations giving rise to the emissions. All incidents and remedial actions will be recorded on the Daily Environmental Monitoring Report.

### **3.7 Control of litter**

The site monitors and controls litter accordingly. The main raw materials are in the form of window frame uPVC or PVC plastics and are heavy and unlikely to cause litter problems external to the site. By products are separated after processing and stored within containers. Daily checks are carried out and good housekeeping standards are implemented as standard practise.

### **3.8 Leaks and spillages**

Environmental incidents are often the result of mechanical breakdown of plant and vehicles. The site operates a proactive maintenance program for items of plant which are integral to the site operating within the Environmental Permit. This incorporates the manufacturer's recommended maintenance and inspection schedules. In the event of plant failure, the site would not accept waste beyond the capacity allowed within the Environmental Permit.

Any spillages are cleaned with absorbent materials if necessary, spill granules are available on site and the contaminated absorbent material would be disposed of at an authorised facility. All details will be recorded on the Daily Environmental Monitoring Report.

### **3.9 Fires on the site**

Waste will not be burned on site.

See Fire Prevention Plan.



## **4 - INFORMATION**

### **4.1 Records**

All records required by the permit will be legible, made as soon as reasonably practicable by the site and retained for a minimum of 6 years at the site. Records of events effecting the environment shall be kept until the permit is surrendered.

All waste entering the site is weighed either:

1. on the weighbridge and a weighbridge ticket is printed, this includes the following information:
  - Time and date received
  - Vehicle registration and waste carrier details
  - Producers name and address
  - Description of the waste by EWC category and quantity in tonnes
2. on pallet scales and the weight received is recorded on paper records and then transferred to the internal computer records system

All waste leaving the site is weighed and a weighbridge ticket is printed, this includes the following information:

- Time and date removed
- Vehicle registration and waste carrier details
- Name of company accepting waste and the carrier
- Description of the waste by EWC category and quantity in tonnes
- Disposal facility accepting the waste

The weighbridge is inspected at least annually, and a Certificate of Verification issued. The weighbridge is maintained and cleaned on a regular schedule.

### **4.2 Reporting**

It is understood that a summary of waste in and waste out of the site will need to be reported to the Environment Agency on a quarterly or annual basis (awaiting confirmation once permit issued). All reports and notifications required by the Environmental Permit will be sent to the Agency using the format detailed in the environmental permit.

### **4.3 Notifications**

Following permit issue, the Environment Agency will be notified when any machinery, breakdown or failure of equipment causes significant pollution. The Environment Agency will also be informed when there is a breach of limit or when there are significant environmental effects. The confirmation of such an event shall be submitted in writing within 24 hours.

The Agency will be informed of changes to the following:

- The Environment Agency shall be given prior notice in writing of any proposed changes to the core environmental management system documents, appendices, drawings and figures.

- The Environment Agency shall be informed of any preparatory works to be undertaken.
- The Environment Agency shall be informed of any commencement, cessation and recommencement of waste storage operations.
- The Environment Agency shall be informed of any changes of the operator's company details, including death and bankruptcy.
- All notifications and submissions will be sent to address specified by the Environment Agency and will quote the reference number and name of the Permit Holder.