RECYCLED MATERIAL SUPPLIES LIMITED

ENVIRONMENTAL MANAGEMENT SYSTEM

Operational Procedures

Reference: EMS-OP-01

Version 1 Dated 8 May 2025

Primrose Wharf

Knights Road

Silvertown

E16 2AT

DOCUMENT CONTROL SHEET

Client	Recycled Material Supplies Limited
Project	Primrose Wharf, Knights Road, Silvertown, E16 2AT
Document Title	Operational Procedures
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1. INTRODUCTION

1.1 Recycled Material Supplies Limited operate a Physical Treatment facility in Primrose Wharf, Knights Road, Silvertown, E16 2AT.

1.2 The site will accept construction, demolition and excavation waste for treatment. The primary purpose is to manufacture aggregates for use in construction.

1.3 There will be a fully enclosed building for receiving waste. The waste will either be stored for crushing or processed through the wash plant.

1.4 Within the site, there will also be a concrete batching facility.

1.5 The facility will also use the wharf to receive aggregates and remove waste. The permit boundary includes the barge loading area along the wharf front.

1.6 This document provides the Operational Procedures and forms part of the Environmental Management System (EMS). The EMS has been prepared with reference to the relevant guidance document[1].

Waste Activities

1.7 The following activities will be undertaken:

Table 1 - Activities

Description of Activities	Limit of Activities
R3: Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes) R5: Recycling/reclamation of other inorganic materials R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced) D9 - Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D12	Treatment consisting only of sorting, separation, screening, crushing, blending or washing of waste into different components for recovery. No more than 350,000 tonnes of waste shall be treated in any one year. Subject to any other requirements of this permit wastes shall be stored for no longer than 3 years prior to recovery.

[1] Non-hazardous and inert waste: appropriate measures for permitted facilities - Guidance - GOV.UK.

2. GENERAL MANAGEMENT APPROPRIATE MEASURES

Management System

2.1 The company currently does not have a certified Environmental Management System. However, the company has developed its own Management System. The EMS will be updated fully once the permit variation has taken effect. This section provides the EMS summary.

Staff Competence

2.2 The operations will be overseen by a Technically Competent Manager (TCM) to ensure that cover is provided at the site. The TCM will be responsible for ensuring the requirements of continued competency is met. Certificates will be kept in the site office.

2.3 The TCM, in conjunction with the Site Manager, will be responsible for the control of incoming and outgoing vehicles, checking Duty of Care documentation, keeping and maintaining all computerised records, checking in all visitors to the site, issuing Health & Safety instructions and reporting any complaints to the management.

2.4 Other site personnel will include administrative staff and site operatives.

2.5 All staff will be trained to a standard which enables them to perform the responsibilities and the detailed role as set out in job descriptions. The EMS provides the job description for each role including:

- Site Management
- Plant Operatives
- Site Operatives
- Administration
- Drivers

2.6 A record of staff training will be kept for each staff member which includes inductions to new processes and procedures as needed.

2.7 All records required to be made by this permit shall be comprehensible, legible, and consistent. If amendments need to be made, they are done so in such a way that any subsequent amendments remain legible. Records, plans and management systems required to be maintained by this permit shall also be kept on site.

2.8 All reports and notifications required to the permit by the Environment Agency shall be made to the Environment Agency using the contact details supplied in writing by the Environment Agency. Within one month of the end of each quarter, the operator shall submit waste returns to the environment agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

Review Management System

2.9 The EMS will be reviewed and updated if any of the following occur:

- Any compliance issues on the site which require mitigation or management intervention.

- Changes to the site operations.
- Changes to local environment which introduces new receptors to the area.

2.10 Some changes may require staff training; this will be carried out and records updated accordingly.

2.11 The following training matrix will be adopted to guide training needs.

Table 2 – Training Matrix

Training	TCM	Plant Operatives	Site Operative	Admin
Induction	x	x	x	x
Accidents and Emergency	x	x	x	x
Amenity Management	x	x	x	x
Plant Training	x	x		
Vehicle marshalling	x	x	x	
Waste Acceptance / Handling	x	x	x	x
Environmental Permitting	x	x	x	x
Complaints and Incidents	x	x	x	x
Spillage Procedure	x	x	x	
Wharf Operations	x	x	x	

Site Infrastructure Plan

2.12 Drawing No RMS-PW-INF-01 provides the site Infrastructure Plan. This shows the site surfacing, locations of buildings, location of fuel tank and site entrance. Within the Environmental Risk Assessment, all key receptors have been identified on a separate plan.

2.13 The site infrastructure includes:

- Enclosed building
- Internal storage bays
- External storage bays
- Fixed Wash Plant with storage bays
- Fixed dust suppression system
- 2 No. Weighbridges

- 2 Storey Office
- Fixed wheel wash
- Fully concreted site with drainage

2.14 There is a noticeboard at the site entrance which provides the following information:

- The permit holder's Name
- An emergency contact name and telephone number
- A statement that the site is permitted by the Environment Agency
- The permit number
- Environment Agency telephone number 03708 506506 and the incident hotline 0800 807060

Accident Management Plan

2.15 The Company recognises the importance of the prevention of accidents that may have environmental consequences and that it is crucial to limit those consequences.

2.16 An accident management plan will be maintained at the facility to ensure the facility, and facility staff are fully prepared for such incidents. The accident management plan will be reviewed at least every four years or as soon as practicable after an incident with changes made accordingly to minimise the risk of recurrence.

2.17 The Accident Management Plan sets out the contingency measures required to deal with plant breakdowns, vandalism, fires, flooding, and bad weather. These measures are provided for the situations which could change the normal operations.

2.18 For each unforeseen event, the plan sets out the following:

- Likelihood of the accident/event occurring
- Consequence of the accident/event occurring
- Measures taken to avoid the accident occurring
- Measures taken to minimise the impact.

2.19 The EMS also provides a list of emergency contacts as well as contacts for the estate and adjoining businesses to contact in the event of an emergency.

2.20 The Accident Management Plan is provided in the EMS-ERA-V1.

Contingency Plans and Procedures

2.21 In conjunction with the Accident Prevention and Management Plan, the EMS includes Contingency Planning. This includes measures to be implemented if the site is forced to close due to unplanned events, or in the event of breakdowns. The procedures will be used to ensure business continuity without impacting the environment.

A Changing Climate

2.22 The operator is aware of the changing climate the UK is experiencing now and likely to experience in the future. With reference to the EA guidance, the UK can expect the following:

- Higher average temperatures – particularly in summer and winter
- More heat waves and hot days
- Rising sea levels
- Changes in rainfall patterns and intensity
- More storms

2.23 A rainwater collection system will be used to store rainwater from the building. This will allow surface water management and containment of activities to protect against dry conditions which can generate dust.

2.24 The washing plant recycles water in the process.

2.25 The Climate Change Risk Assessment is provided with the EMS-ERA-V1.

Facility Decommissioning

2.26 In the event that the operations cease at the site, the operator will proceed with an application to surrender the permit. This will require a Site Closure Plan to demonstrate that activities at the site have ceased and pose no risk to the environment.

3. SITE OPERATIONS

3.1 The site receives non-hazardous waste from construction projects. The following activities will take place:

Waste Recycling Building

3.2 Waste will be received and treated inside a building.

3.3 The building will be used to receive construction and demolition (C&D) waste for crushing and/or washing.

3.4 The building has been designed to accommodate the crushing plant. The waste will be unloaded inside the building and crushed. The products will be stored in aggregate bays outside. The products will meet the end of waste criteria and will be returned to construction projects in London.

3.5 The building will also be used to receive C&D waste for washing. There will be a separate reception area for this. The waste will be loaded into the wash plant feed hopper inside the building.

3.6 The building will be 60m x 35m. It will be 12m at the rear, rising to 15m at the front. There will be two roller shutter doors for access. One will be used to access the concrete crushing operation, and one will be used to access the wash plant reception area.

3.7 The building will be enclosed on all sides, other than for the provision of roller shutter doors, pedestrian fire exits and the exit conveyor from the wash plant. The conveyor will be enclosed.

3.8 All vehicles will leave the site via the wheel wash.

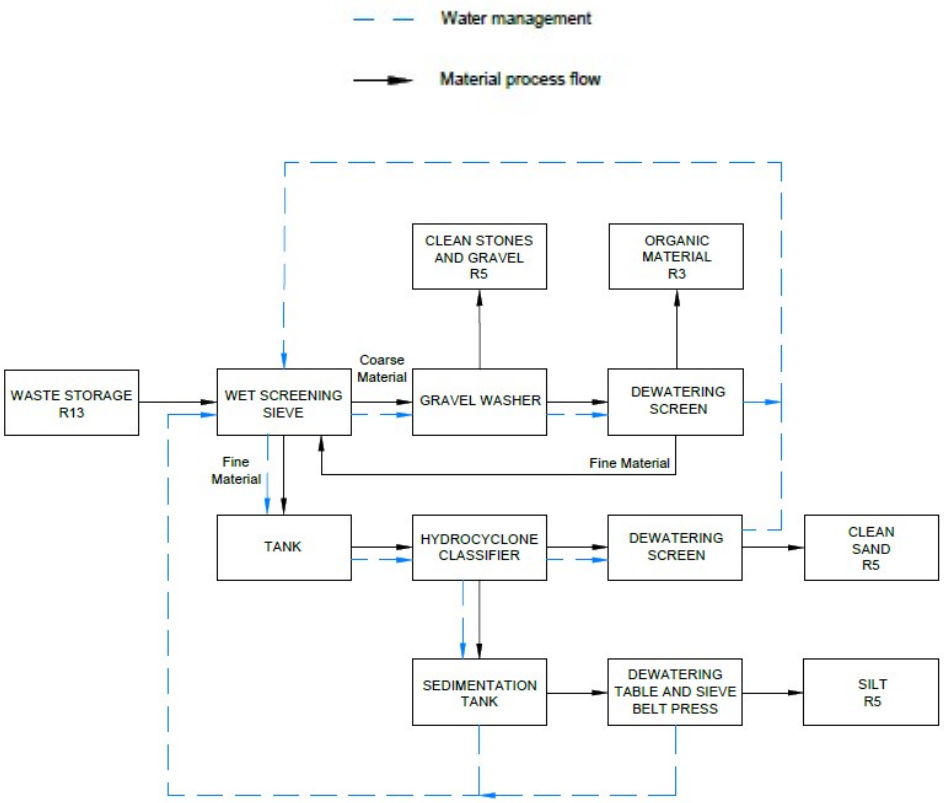
Wash Plant

3.9 The wash plant will treat construction and demolition waste to separate waste into different fractions by particle size separation and gravity separation. Water is used to aid the separation process. The plant will be a bespoke system designed for RMS.

3.10 Mixed C&D waste will be received inside the building and loaded into the feed hopper located inside the building.

3.11 The process flow diagram is shown on Figure 1.

Figure 1 Indicative Process Flow for the Wash Plant



3.12 The processes undertaken in the washing plant comprise screening and sieving, washing, flotation, settlement and filtration. The washing plant consists generally of the following equipment:

- Input hopper
- Wet sieve
- Sword washer (gravel washing system)
- Hydrocyclone unit (sand cleaning and separation)
- Dewatering screens
- Sedimentation tank
- Sieve belt press
- Generator
- Pumps
- Conveyors
- Process water storage tank
- Silt Storage Tank

3.13 The washing process involves the separation of coarse sand and/or gravel particles from the finer silt particles. Waste is transferred within the wash plant using conveyors and enclosed pipework.

3.14 The waste will be received within a bay inside the new building. It will be transferred to the feed hopper of the wash plant by loading shovel or excavator. The feed hopper will also be located inside the building. From the input hopper the material will be transferred by a conveyor onto a series of wet sieves of different mesh sizes (10mm, 20mm and 40mm) where the material is separated into coarse fractions which pass to a gravel washer and a fine fraction which passes to a cyclone. In the gravel washer the coarser material fraction is cleaned, and any residual fine material is washed off the coarse gravel. Gravel is screened and separated from the washer and deposited into a container or deposited directly onto the concrete surface and is then transferred to a storage area. Fine material separated from the gravel is transported back to the wet sieve.

3.15 From the wet sieve the separated sand/silt mixture falls into a tank and is pumped to the cyclone. In the cyclone the sand and the silt are separated. The sand is dewatered and deposited into a container or deposited directly onto the concrete surface and is then transferred to a storage area. The silt is transferred to a sedimentation tank and following settlement is pumped to a belt press for dewatering. The dewatered silt is deposited directly onto the concrete surface and will then be transferred to a storage area, pending loading onto a barge.

3.16 The process recycles water. The water is passed through a press to separate the fines from the water. The water will be recycled. The fines will produce a filter cake which will either be recirculated through the plant or sent off site.

3.17 The process will produce the following secondary aggregates:

- Silty Clay
- 0-2mm Coarse to very coarse sand
- 2-4mm Very fine gravel
- 4-10mm Fine gravel
- 10-20mm Medium gravel
- 20-40mm Coarse gravel
- Type 1 Unbound Mixture
- Class 6F5 Selected Granular Material

3.18 All these products will be used in the construction industry.

3.19 The process is a wet system, recycling the water through the washing process.

3.20 The residual silt will be removed from the site using the wharf.

4. WASTE PRE-ACCEPTANCE, ACCEPTANCE AND TRACKING

Pre- Acceptance

4.1 The operator has vast experience with C&D waste. This facility will replace the existing operational facility at Sunshine Wharf.

4.2 The following wastes will be typically accepted at the site. The full waste list is provided in EMS-ERA-V1.

Table 3 –Wastes to be Typically Accepted at the Site

EWC Code	Description	Area in Site	Treatment Activities
17 01 01	Concrete	Main Building	Crushed
17 01 02	Bricks	Main Building	Crushed
17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06	Main Building	Crushed
17 03 02	Bituminous mixtures other than those mentioned in 17 03 01	Main Building	Crushed
17 05 04	Soils and Stones	Main Building	Wash Plant
17 09 04	Mixed construction and demolition wastes other than those mentioned in 170901, 170902 and 170903	Main Building / Wash Plant	Wash Plant
19 12 12	Mixed C&D waste from other similar sites	Main Building / Wash Plant	Wash Plant

4.3 The pre-acceptance checks will require site administration staff to record the following information:

- The source and nature of the waste
- Potential risks associated with the waste
- Classification of the waste
- Volume of waste
- Timescales for work

4.4 The office staff will refer to the TCM / Site Manager to confirm that the site has capacity to receive the waste and can treat/transfer the waste.

4.5 Once approved by the TCM, the work will be booked in.

Waste Acceptance

4.6 The operator handles a defined set of wastes. All drivers are trained to check the loads at the collection point. Any issues will be reported to the site management. If necessary, the TCM or site manager will visit the site and confirm the status of the waste. This procedure reduces the likelihood of non-compliant waste being received at the site.

4.7 On arrival at Primrose Wharf, the driver will report to the weighbridge office to complete the waste transfer note. The driver will be informed about the correct unloading area.

4.8 The weighbridge office staff will notify the TCM/Site Manager about expecting a delivery and the correct building door will be opened.

4.9 As the waste is unloaded, the machine driver will visually check the waste.

4.10 The waste acceptance procedures are set out in Figure 2.

Quarantine

4.11 Any non-compliant waste found in the load will be segregated and quarantined. The customer will be charged for the additional handling costs associated with these wastes.

4.12 Typically, with C&D waste, there may be times when the excavation work may include buried plastic pipes or membranes. Any such waste will be left at the source site. If it is encountered at Primrose Wharf, it will be removed and placed into a quarantine container. This may be a skip or an enclosed bin. The TCM will check the quarantine area daily and arrange to remove any such waste once the area is nearly 75% full. The skip will be located inside the building. Enclosed/covered skips/bins can be stored outside.

4.13 Details of all rejected loads will be recorded in the site diary. This will include the driver details, vehicle registration, nature of the waste, date/time of rejection.

4.14 A duty of care transfer note or hazardous waste consignment note will be generated for each non conforming waste load returned off site.

Waste Tracking

4.15 The TCM will maintain records of the waste being accepted, its treatment and outputs. The aggregates produced on site will be certified and will be dispatched from the site as certified products. Any waste removal from the site will be accompanied by a Waste Transfer Note.

Figure 2 – Waste Acceptance Procedures

PRE-ACCEPTANCE (ENQUIRY) STAGE

- Obtain information about the source and nature of the waste (including type, quantity, EWC code)
- Check waste classification documents.
- For third party deliveries, confirm that the carrier and the site have appropriate registration/authorisations in place
- Check that sufficient storage/treatment capacity will be available at the site
- Maintain appropriate records

ACCEPTANCE (INITIAL INSPECTION) STAGE

- Ensure that the delivery driver reports to the Site Office
- Obtain all necessary Duty of Care (DoC) paperwork for the load from the delivery driver
- Visually inspect the load and confirm that it is suitable for acceptance at the site
- If the load is confirmed as acceptable, check that the DoC documentation is consistent with the information provided at the pre-acceptance stage and with the delivered load
- Complete and sign and retain our copy of the DoC documentation
- Direct the driver to unload in the appropriate area of the site OR reject the load and record details

ACCEPTANCE (SECONDARY INSPECTION) STAGE

- Ensure that the load has been deposited in the correct area of the site
- Visually inspect the load and confirm that it is suitable for acceptance at the site
- If the load is not suitable, arrange for the deposited loads to be removed from the site
- Waste types and quantities received at the site shall be recorded

Concrete Batching

4.16 In addition to the waste activities, there will also be a concrete batching facility. For the purposes of this site EMS, the concrete batching process has also been included.

4.17 It will include storage silos, aggregate bays, concrete batching unit (with building) and small office.

4.18 The incoming materials will include cement, aggregates and sand. The sand and aggregates will be imported using the wharf. The cement will be delivered by road and transferred into a storage silo.

4.19 The aggregates will be loaded into a feed hopper. The sand will be loaded into a separate feed hopper. These materials will be conveyed into a mixing unit, where the cement is added from the silo tank.

4.20 A road mixer lorry will reverse into the building via the southern elevation, and the mixed materials will be transferred into the vehicle with water. The mixing will continue in the vehicle until it is ready to discharge at the end market.

4.21 The process is likely to produce in the region of 50,000m^3 of concrete per year. Aggregates and sand will be delivered by barge. Cement will be delivered in enclosed lorries.

5. WASTE STORAGE

5.1 The site has defined areas for receiving and storing waste and aggregates. This section deals with waste storage only.

5.2 Aggregates will also be stored on the site including primary aggregates for concrete batching operation and secondary aggregates that have been certified as being products. Whilst no longer a waste, the volume of products in each bay has been set out in Table 4.

Table 4 – Storage Volume Non Hazardous Waste

Waste Area	Dimensions	Height	Volume m^3
Non-Hazardous Waste for crushing	15m x 15m	5m	800
Non-Hazardous Waste for wash plant	15m x 10m	5m	525
Aggregate Bay	6m x 10m	5m	150
Aggregate Bay	6m x 10m	5m	150
Aggregate Bay	6m x 10m	5m	150
Aggregate Bay	6m x 10m	5m	150
Silt Bay	15m x 10m	5m	500

5.3 The total storage volume of non-hazardous waste stored in the building will be 1,325m^3.

5.4 The waste will be continuously processed to maintain capacity. The storage bays will be checked daily.

5.5 Some outputs from the crushing process may be transferred to the wash plant.

5.6 The site has been designed to receive waste inside the building and store aggregates outside. This avoids/minimises any potential for cross contamination.

6. WASTE TREATMENT

6.1 The purpose of waste treatment at this site is to produce aggregates. The plant and machinery is bespoke for this specific purpose.

6.2 The operator has an established reputation for managing C&D waste and therefore it is unlikely that non-compliant waste will be accepted at the site.

6.3 The wash plant is bespoke technology designed to wash and separate different grades of aggregates. The technology will be installed by the provider and subject to a service agreement.

6.4 The outputs from the crushing and wash plant will be certified and classified accordingly.

7. EMISIONS CONTROL

Point Source Emissions to Air

7.1 There will be no point source emissions to air.

7.2 The treatment process does not produce gases.

Point Source Emissions to Surface Water and Sewer

7.3 The entire site is concreted and will have sealed drainage inside the building.

7.4 The site will be zoned into different drainage areas as follows:

- Waste Building - sealed drainage.
- Roof Water – stored in tank for use.
- Wash plant footprint – capture water for use in wash plant.
- External storage and parking area – attenuation tank with hydrobrake release to sewer
- Upper level – captured and released to River Thames

7.5 The drainage system will be checked daily. For the sealed tank, once 80% full, arrangements will be made with an approved contractor to empty the tank and transfer the contents to an authorised facility.

7.6 The above ground fuel tank is bunded in accordance with the regulations.

Point Source Emissions to Groundwater

7.7 There will be no point source emissions to groundwater.

7.8 The entire site is concreted.

Fugitive Emissions to Air

7.9 There is a risk of emissions to air from particulate matter. The site has been designed to minimise emissions by locating the waste reception and treatment areas within the building.

7.10 The operator has implemented an Environmental Management System, and the following procedures are applicable to this activity:

- Dust Management Plan, including monitoring.
- Regular cleaning

Odour

7.11 With reference to the Environmental Risk Assessment, the likelihood of odour being generated and causing a nuisance or harm is low.

7.12 The nature of the waste being accepted is unlikely to generate odour.

Noise and vibration

7.13 The site is in an industrial area, with road traffic and other industries dominating.

7.14 The waste crushing operations will take place inside a fully enclosed building. The hours of operation will be

07:00-17:00 Monday to Friday

07:00-1300 Saturday

No operations on Sunday or Public Holidays

7.15 The site is a safeguarded wharf. The use of the wharf will be determined by the tides and loading/unloading may take place outside of these hours.

Complaints

7.16 The Site Manager has the overall responsibility for this procedure.

7.17 The administration staff will all be responsible for handling complaints and recording on the correct form. All complaints must be referred to the Site Manager. In this context, a complaint may be received directly from a resident, customer or from a Regulator.

7.18 When the site receives a complaint, a record is summarised in the Site Diary. Full details will be provided on the complaints form, see Appendix A.

7.19 All staff based in the office will be trained on recording complaints and to make sure they notify the TCM immediately.

7.20 The TCM will review the activities that may have given rise to the complaint. If necessary, the CCTV footage will be reviewed to note any specific operational issues that may have given rise to the source of the complaint. Other actions will include:

7.21 Review of site diary and London Air Quality Network monitoring stations for any unusual regional weather events occurring during the day on which the compliant was made, for example Saharan dust storms.

- Review site diary and establish what site activities were taking place at the time the complaint even occurred.
- Review waste types accepted that day.
- Identify whether there were any other activities in the area taking place that could have generated dust/noise e.g. road works or construction works.
- If it is established that the emissions were attributable to activities being undertaken at the site, as necessary review the relevant operational procedures and implement improvements and provide additional training to site.
- The action taken will be reported to the Environment Agency.

7.22 The Site Manager will report the findings to the complainant and implement appropriate corrective action in accordance with a specific management plan or the Operational Procedures.

7.23 The TCM will aim to provide feedback within 48 hours of receiving the complaint.

8. EMISSIONS MONITORING AND LIMITS

Dust Monitoring

8.1 Dust monitoring will be carried out in accordance with the DEMP.

Noise Monitoring

8.2 Noise levels will be checked by the Site Manager Daily. No formal noise monitoring is required.

9. WASTE MINIMISATION, RECOVERY AND DISPOSAL

9.1 The operation is designed to primarily manage C&D waste to produce aggregates.

9.2 The wash plant is bespoke technology that is designed to maximise the separate of aggregates for re-use.

9.3 Options for maximising the recycling potential of C&D waste is continuously monitored by RMS.

10. IMPACT ASSESSMENT

10.1 A Risk Assessment is provided as a separate report.

Appendix A
Complaint Form

Notifier Details	
Name -	
Address – Postcode -	
Contact Details -	
Tel -	
Email -	
Date -	
Complaint Ref Number -	
Nature of Complaint	

Investigation Details	
Investigation carried out by -	
Position -	
Date & time investigation carried out -	
Weather conditions -	
Wind direction and speed -	
Investigation findings -	
Feedback given to Environment Agency and/or local authority -	
Date feedback given -	
Feedback given to public -	
Date feedback given -	

Review and Improve	
Improvements needed to prevent a reoccurrence -	
Proposed date for completion of the improvements -	
Actual date for completion -	
If different insert reason for delay -	
Does the dust management plan need to be updated -	
Date that the dust management plan was updated -	

Closure	
Site manager review date	
Site manager signature to confirm no further action required	