ENVIRONMENTAL MANAGEMENT SYSTEM

G & C WASTE PAPER LTD

Site Address

UNIT H RD PARK STEPHENSON CLOSE HODDESDON EN11 0BW

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General Considerations

1.1 Site operator/permit type

- 1.1.1 G & C Waste Paper Ltd are applying for a Bespoke Permit and will operate EPR/EP3320LM, a Household, commercial and industrial (HCI) waste transfer station with treatment.
- 1.1.2 This document has been produced in line with other operational documents which should be read in conjunction with the site Fire Prevention Plan (FPP).

1.2 Site locality

1.2.1 The site is located at unit H, RD Park, Stephenson close, Hoddesdon, EN11 OBW as shown on the plan below.

1.3 Permit area/waste management operations

1.3.1 The permit boundary is outlined in green below. All references to 'the site' in this EMS shall mean this area and the associated infrastructure, plant and equipment.



- 1.3.2 The EP is required for the storage (keeping) prior to removal, and treatment (all types of handling/processing) of waste. Waste treatment processes which can be carried out on site will include the following:
 - Sorting (with telehandler or by hand)
 - Separation (by using plant/equipment and by hand)
 - Baling
- 1.3.3 The activities will be undertaken in accordance with appropriate measures specified in the non-hazardous and inert waste appropriate measures guidance.

All process plant and equipment shall be commissioned, operated, and maintained in accordance with the manufacturer's recommendations and shall be fully documented and recorded.

Table 1 Permitted Activities

Activity reference	Description of specified activity	Limits of specified activity
AR1 – waste transfer and treatment	 R3: Recycling/reclamation of organic substances which are not used as solvents. R4: Recycling/reclamation of metals and metal compounds. 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 D8 and D10 to D12. D14: Repackaging prior to submission to any of the operations numbered D1 to 13. D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where the waste is produced) 	 The activities are limited to the operation of a waste treatment and transfer station. Treatment activities are limited to sorting, separation, screening, baling, shredding, crushing, compaction, and bulking. Treatment does not include soil or aggregate washing or heat treatments. The activities are limited as follows: no more than 75,000 tonnes of waste, shall be accepted per year; no more than 50 tonnes per day of waste may be treated for disposal.
AR2 – storage of waste	 R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced) 	No more than 15,000 tonnes of wastes listed in table 2.3a and any processed wastes derived from them shall be stored at any one time. No more than 40,000 tonnes of wastes listed in table 2.3b and any processed wastes derived from them shall be stored at any one time. Waste shall not be stored for longer than 6 months.

1.4 Hours of operation

- 1.4.1 The site will be open during the following hours for the delivery and receipt of waste on site; including depositing, sorting, moving, storing and removing waste: Monday to Friday 07:00 -16.00.
- 1.4.2 During times where the site is closed or not in operation, the site will be locked and secured to prevent unauthorised vehicular or pedestrian access.

1.5 Staffing and management

1.5.1 **Table 1.5 - Staffing Levels**

Position	Employee	Responsibilities
Site manager	1	Overseeing and coordinating all activities which take place at the site
Machine / plant	2	Operating loading plant / site
Office manager	1	Managing site administration
General operatives	2	Sorting waste, maintenance, litter picking etc.
Lorry drivers	2	Collect/delivering skips

1.6 Health and safety

1.6.1 All operations on site will be carried out in accordance with the relevant requirements of the Health and Safety at Work Act 1974.

1.7 Fit and proper person

- 1.7.1 The site's Technically Competent Manager (TCM) will provide the required attendance time at the facility as required by guidance periodically issued by the EA. A copy of TCM's Certificate of Technical Competence (COTC) will always be made available in the site office.
- 1.7.2 The company, through the TCM, will ensure that a nominated deputy is sufficiently trained and familiar with the EP and this EMS document in addition to all relevant company procedures who, in the absence of the TCM, will act the competent person. If either the TCM or deputy is changed, the EA will be informed of the change and the relevant details of the replacement as soon as possible.

2 Site Engineering and Infrastructure

2.1 Site description

2.1.1 The general location of the operational, treatment and storage areas above are shown on the Site Plan Drawing No. GCSP01.

2.2 Site office

- 2.2.1 The site office is located to the right of the site entrance, shown on Drawing GCSP01. The documents listed below will be retained in the site office.
 - The Environmental Permit (original & any subsequent variations)
 - This Environmental Management System (EA agreed document)
 - Fire Plan
 - Current site diary (to record all inspections/visitors to the site)
 - Environment Agency inspection (CAR) forms
 - In-house inspection sheets/recording forms
 - Duty of care transfer notes (for 2 years minimum)
 - Hazardous waste consignment notes (kept for 3 years)
 - Accident book & 1st aid kit

2.3 Weighing and categorising loads

2.3.1 The site has a weighbridge for accurate weighing of loads to and from the site. The weighbridge will be maintained and calibrated on a regular basis. During instances where the weighbridge is out of action, the weight of each load into and out of the site will also be estimated using the standard EA/WRAP agreed volume-to-weight conversion factors.

2.4 Notice board and signs

- 2.4.1 A notice board is erected at the site entrance and displays the following information:
 - The site name and address.
 - The name of the permit holder and operator.
 - The Environmental Permit number and accompanying statement stating that the site is permitted by the Environment Agency.
 - Environment Agency contact details, Emergency No. 0800 80 70 60 and General Enquires No. 03708 506 506.
 - Operator's "out of hours" emergency contact details (telephone number).
 - Operating hours.

2.4.2 Additional signs are displayed around the site for operational / health & safety purposes. All staff and visitors will be required to comply with the requirements of all signs whilst on site.

2.5 Site security

- 2.5.1 The boundary of the site is protected from unauthorised access by members of the public for security. The site access gates are of steel construction and are lockable to prevent unauthorised vehicular or pedestrian access out-of-hours. The site has two sets of steel gates for vehicle access, the main entrance to the front yard and a side entrance to the rear yard. There is security fencing around the entire perimeter of the site.
- 2.5.2 The site has 24-hour CCTV system which is remotely accessible by Management. The footage can be viewed in real time and a decision made as to what further action to take i.e. visit the site or call the Police, EA or FRS. The Industrial Estate itself also has 24 hour security with CCTV and Security Guards that patrol overnight who will contact the site Management if the need arises.
- 2.5.3 The site security measures will be inspected on a daily basis and any defects which impair the effectiveness of the security will be repaired by the end of the working day. If this is not possible, temporary measures will be put in place to ensure no unauthorised access to the site can be gained until the proper repairs can be carried out as soon as practicably possible.
- 2.5.4 If unauthorised access becomes apparent as a problem at the site the security measures will be reviewed and improvements implemented.

2.6 Fuel storage

2.6.1 All fuel is stored away from the waste areas within the designated tanks to the east of the site, there is 1 x 5000L diesel tank stored inside a container in the front yard. No other hazardous materials are stored on site. The location is shown on site plan GCSP01.

2.7 Rejected Waste

2.7.1 Any waste which is rejected will be stored in the quarantine bay or in a quarantine skip. The location of this skip may vary as operating conditions permit (i.e. to permit the loading of rejected wastes but clear labelling and management control will ensure its use as specified). Rejected waste will be recorded in the site diary and full details recorded on a Rejected Waste Form

2.8 Drainage checks and contingencies

- 2.8.1 The external operational area site surface is constructed of impermeable concrete and drains to surface gulleys to the south and north of the site as shown on drawing GCFPP01 Fire Plan. No run off from the stored waste will enter the surface water as the gradient of the bays has been constructed in such a manner that they slope and any water will run to the back of the bays and be retained in the bays. Any rainwater will subsequently be soaked up by the waste.
- 2.8.2 Daily and weekly checks will take place by trained staff using inspection forms which will check for the following as a minimum:
 - Surface water pooling (blocked drain /heavy rainfall) daily
 - Surfacing cracks in concrete (daily)

2.9 Vehicles, plant and equipment

2.9.1 Waste will be handled using the plant listed in Table 2.1 below. Only trained operators will be permitted to drive/operate the plant listed below. Any changes to the list will be notified to the EA prior to implementation.

Item Number		Function		
Weighbridge	1	Determine load weights in/out		
Telehandler	2	Loading/unloading/movement/sorting		
Forklifts	6	Loading/unloading/movement/sorting		
Baler	1	Baling cardboard / paper		
Shredder	1	Paper shredder		

Table 2.1 - Plant & Equipment

2.9.2 The site has a Planned Preventative Maintenance Programme to ensure all machinery and components continue to remain effective. There is a programme of routine planned maintenance for each item of plant and machinery to manufacturers specifications, as well as the processing equipment in order to prevent breakdown and faults which may pose a fire risk.

A Planned Preventative Maintenance schedule and Maintenance Contract will be in place to ensure that electrical equipment is fit for purpose and to minimise the risk of ignition sources. All faults needing corrective action will be reported to the Site Manager to be implemented. For contingency, G & C Waste Paper recognise that if needed to ensure a continued material throughput, machinery will be hired from specialists if a significant plant breakdown occurs. This is to ensure continued effective operations and prevent excessive storage of materials which are likely to give rise to the exceeding of permitted waste quantities.

3. Site Operations

3.1 Preliminary procedures

3.1.1 Guidance will be given by the site operator to all employees, sub-contractors, other waste carriers and customers regarding the waste types which are acceptable at the site (i.e. a copy of the relevant authorisations for the site such as the EP). Generally, the waste material is brought to site by the companies own skips however, waste is accepted under sub-contractors or is delivered by other known hauliers in these circumstances carrier registration details will be taken prior to tipping of the waste. All haulage operators bringing waste to the site will be periodically checked with the EA to ensure that they are registered as Waste Carriers with the EA.

3.2.1 Waste Acceptance Procedure

All deliveries will report to the site office/weighbridge and the driver will be asked to describe the nature of the waste on the delivery vehicle to check the description of the waste matches the documentation, and the site is permitted to accept the waste. The carrier's license is also inspected at this point.

The vehicle is then weighed and a ticket is produced whilst the driver receives the sites safety rules and instructions if applicable. If the visual check of the load does not match the description or the list of acceptable wastes within the sites Environmental Permit the load will be rejected.

If the load matches the description on the waste transfer note and is a permitted waste the vehicle is then directed to the relevant area or building to discharge the load; at this point a further visual inspection of the waste takes place to ensure there is no non-conforming waste within the load.

If the waste discharged correctly matches the transfer note description the vehicle will be directed back to the site office to complete the ticket/transfer note procedure.

Any non- conforming waste (waste that is not described or permitted on the Environmental permit) discovered within the load will be removed back to the waste producer or to a suitably licensed site. All rejected wastes will be noted in the site diary and a Rejection Form completed, the Environment Agency shall be informed if necessary.

3.2.2 Persistent Organic Pollutants (POPs)

POPs Are not accepted at site. If found they are isolated and either returned to producer or sent to an appropriately authorised site.

3.3 Waste procedure

3.3.1 Once a load has been accepted by the operator the contents of the delivery vehicle will be discharged into the relevant area or bay shown on the site drawing GCSP01 in accordance with the following procedures:

All mixed loads will be deposited into the mixed waste reception bays in the external yard and crudely sorted by hand (or mechanically) into recyclable materials such as paper, cardboard, plastics, wood, metal etc and transferred into the appropriate recycling bays/skips.

All dry mixed waste (cardboard, paper and plastic) will be discharged inside the building for sorting and baling. Paper will be shredded in the shredder prior to baling.

3.4 Waste Storage, Types and Quantities

3.4.1 The locations of the operational and storage areas are shown on Drawing No. GCSP01. The nature of operations at waste facilities means that certain operational areas may change depending on processing requirements.

The waste types handled on site will consist of household, construction and industrial non-hazardous waste and dry mixed waste (cardboard, paper and plastic).

The site can accept 75,000 tonnes of waste into the site per annum. The table below details a summary of the main wastes types which will be accepted and stored at the site including proposed storage quantities in m³.

Table 3.4 – Stockpile sizes / Waste Storage Times

The storage of wastes on site is shown in GCSP01Site Plan and the quantities and dimensions are shown in the table below.

LOCATION	DIMENSIONS (m)	CAPACITY M ₃	TIME
BUILDING			
Main building	7 x 5 x 2	70	48 Hours
Cardboard			
Main building	7 x 5 x 2	70	48 Hours
Dry mixed waste			
EXTERNAL	DIMENSIONS (m)	CAPACITY M ₃	TIME
External bay mixed skip	8 X 8 X 3	192	48 Hours
waste			
External bay mixed skip	8 X 8 X 3	192	48 Hours
waste			
External bay baled	10 X 8 X 3	240	48 Hours
cardboard /plastic			
Wood Tipping Bin	1.25 x 0.75 x 1	0.9	8 Hours
Metal Tipping Bin	1.25 x 0.75 x 1	0.9	8 Hours
Wood Roll-on-off	6.10 x 2.25 x 1.77	23	1 Week
Metal Roll-on-off	6.10 x 2.25 x 1.77	23	1 Week

The waste shall be progressively rotated every few hours and the site supervisor/operator shall monitor the stock for any hot spots or change in the wastes nature and record within the site log.

All recovered/recycled materials and waste residue stored shall be removed when storage area/bin is full. This will be checked and recorded on the daily site log to ensure waste is removed within the previously specified time of 48 hours. This demonstrates rotation of waste well within the storage times of below 3 months as a minimum as stated in the FPP guidance. If for any reason the building, bay or bins become full to capacity the site would cease accepting waste until sufficient capacity is restored.

The bays and storage within containers have been designed to keep tonnages of waste stored to a limited low tonnage. This will ensure the waste is rotated as residual waste needs to be removed before further waste can be accepted onto site. Levels will be checked and recorded at all times throughout the day to ensure capacity is available.

The waste within the building is stored to a maximum height of 2m therefore the edge of the roof is 7.8m above the waste stockpile rising to a further 2m to the apex of the roof. The airspace beneath the roof acts as a thermal break, stopping conductive heat transfer.

3.5 Record keeping

- 3.5.1 G & C Waste Paper Ltd use detailed waste transfer notes to ensure compliance with the Waste Duty of Care Code of Practice March 2016 (Section 34(9) of the Environmental Protection Act 1990).
- 3.5.2 The following details are recorded for every load of waste deposited and leaving the site:
 - The date and time of delivery.
 - The name and address of the waste producer.
 - Description of the waste including type, quantity and EWC codes.
 - How the waste is contained e.g. loose, container type.
 - The carrier's name and address.
 - Driver's name, signature and vehicle registration No.
 - Signature of person producing/accepting/carrying the waste
 - Additional handling notes made by the driver after inspection of load.
 - SIC code of the transferor.
 - Waste hierarchy declaration.
- 3.5.3 A summary of waste types and quantities deposited at and removed from the site and origin and destination details are then forwarded to the EA, with submission due within one month of the end of each quarter as below:
 - a) Quarter 1: January to March (due on or before 30th April)
 - b) Quarter 2: April to June (due on or before 31st July)
 - c) Quarter 3: July September (due on or before 31st October)
 - d) Quarter 4: October December (due on or before 31st January of the following year).

3.6 Management techniques

- 3.6.1 All measures necessary to achieve a high level of protection of the environment and to ensure that the site is operated in accordance with this EMS and EP conditions will be strictly adhered to.
- 3.6.2 The manner in which the facility is managed is a critical element in ensuring emissions from the site operations are minimised. Therefore, management of this facility will ensure:

- a) staff are competent to manage and operate the facility;
- b) waste acceptance procedures are in place;
- c) appropriate storage and handling procedures are in place;
- d) waste/product dispatch procedures are in place;
- e) procedures and control techniques in place to minimise potential emissions to air, land and water;
- f) documents are in place (this EMS and FPP) to ensure standards are maintained, including incidents and complaints management procedures;

4 Environmental Control, Monitoring and Reporting

4.1 Site inspections and maintenance

- 4.1.1 The type and inspection frequencies for maintenance/housekeeping are listed on the Checklist. The Checklist will be completed by a person who is familiar with the requirements of the EMS and EP for the site. All details of defects, problems and repairs carried out will be recorded on the form on the day that each event occurs. Detailed comments may also be recorded in a site diary. All repairs will be carried out as soon as practically possible.
- 4.1.2 All repairs to site security will take place as soon as practically possible and the site will be made secure until the repair has been carried out. Any major defects found during the daily site inspection will be repaired as soon as practically possible.

4.2 Control of mud and debris

4.2.1 Vehicles will be visually inspected before exit at the weighbridge to check that loads are safe and that no mud is carried out by the vehicles. This will reduce the risk of mud/debris escaping onto the public highway. Visual inspections of the vehicle running surfaces at the site will also be carried out daily and staff will report any problems with mud or debris on the site roads immediately to the site manager.

4.2.2 The deposit of material on the access road or public highway will be treated as an emergency and will be cleared immediately by the operator using either a brush and shovel or vacuum tanker/road sweeper if necessary. Silt will not be washed into roadside drains or gullies.

4.3 Control of dust

4.3.1 It is considered that the types, nature and quantity of waste permitted to be accepted at the site will present a low risk of dust generation by the operation of the site.

The potential for the facility to generate fugitive dust is controlled by mister systems and handheld hoses which are sufficient in length to cover the entire site and is used when necessary i.e. dusty loads /hot days. All staff have been trained on damping down and drivers have been trained in how to deposit loads to minimise any emissions.

There is no trommel on site to generate dust and most sorting is carried out by hand so dust emission will be minimal. In the unlikely event that complaints are received from neighbours regarding dust emissions from site being of nuisance or that during routine site inspections the EA observe dust being emitted from site operations to such an extent that they consider a nuisance being caused the operator shall instruct that operations cease until the problem has been resolved.

Monitoring of dust, fibres and particulates will be carried out by visual inspection by the TCM and experienced site staff to ensure that the site is not generating unacceptable concentrations of dust, fibres and particulates due to its operation.

Visual checks are carried out throughout the day whenever a skip lorry deposits its load or when a potentially dusty waste is loaded such as hardcore, this will be covered with handheld hoses to supress any dust.

The staff have been trained to have a constant awareness of any potentially problematic loads upon discharge in the waste reception areas. All staff are trained regarding dust emissions and suppression by the Management.

The results of visual dust, fibres and particulate monitoring will be recorded in the site diary if any issues arise. The site diary is maintained in the site office.

4.4 Odour control

4.4.1 **Control and monitoring of odours**

It is considered that the types, nature and quantity of waste permitted to be accepted at the site will present a low risk of excessive odour generation by the operation of the facility.

The facility will handle mixed HCI wastes, which may contain malodorous materials, which may not be identified until they are discharged into the waste reception area. It will be the responsibility of the TCM, Site Manager and site staff, as part of their daily duties, to identify and record in the site diary, wastes giving offensive odours, and the actions taken to suppress the nuisance.

Waste discharged into a waste reception area that is found to be excessively malodorous will be identified and removed from site on the next transfer vehicle for disposal.

The monitoring of odour generation and levels in general will be continuous throughout the daily operation of the facility by the site staff and action will be taken as appropriate (see above) to control and remediate any excessive generation. Further monitoring will be carried out the Site Manager in the morning prior to starting work (avoiding the possibility of possibly being desensitised to any odour present) and in the afternoon prior to closing the site for the day. Should an odour issue be noticed formal odour monitoring will be carried out using Odour Monitoring Form in Appendix 5.

Any actions taken will be recorded in the site diary by the TCM, Site Manager or site staff.

4.5 Litter control

- 4.5.1 Given the nature of wastes accepted at the site (i.e. light wastes including paper/cardboard) and the external operations, there is a risk of litter from the site so careful management is required to reduce the risk.
- 4.5.2 Daily inspections for litter will be carried out for the presence of windblown litter and operatives will be instructed to collect the litter and place it in a skip or bay for disposal/recovery. Regular checks of the site boundary and areas immediately beyond the site boundary will be carried out by site operatives throughout the day and at the end of the working day. Any litter or debris found will be placed in skips or bays.
- 4.5.3 All light wastes are compacted and kept in a secure bay or container. In the event of high winds then any free-standing light waste will be transferred to a sealed skip or container and covered to prevent it being blown off site.

4.6 Control of pests, birds and other scavengers

- 4.6.1 As the site will be accepting household waste skips there is potential for small amounts of non-permitted food waste which may give rise to the risk of pests. The site will reduce this by immediately securing any food waste in a sealed bin and removing it from site as soon as possible. Daily inspections will be carried out for the presence of pests and the results of the inspection noted in the site diary or site inspection form.
- 4.6.2 As rejected or wastes likely to attract pests will be stored for no more than 48 hours, it is unlikely that pests will become problematic. If any occurrences are noted, a pest controller will be called to site to eradicate the problem within a suitable timescale agreed with the EA.

4.7 Control and monitoring of noise & vibration

4.7.1 The waste operations will be carried out so as to minimise the noise from the site. The measures detailed below will ensure the noise levels at the site are managed appropriately by identifying the likely sources of noise arising from the operations on site and the actions to be followed.

Potential Noise Source	Action to be taken to prevent or minimise
Vehicles travelling to and from the site for delivery /collection of wastes.	All vehicles are required to be driven onto and off site with due consideration for neighbouring premises.
Loading/unloading of waste delivery vehicles	Vehicles must be well maintained and moving parts to be regularly lubricated.
	All vehicles must be driven slowly around the site (5mph site speed limit).
	Engines to be switched off when not in use. No shaking of vehicle bodies whilst raised.
Operation of loading plant (i.e. telehandler/360)	Drop heights to be kept to a minimum, particularly when loading empty tipper/ skip/ container to minimise noise/vibration.
	Engines to be switched off when not in use. Plant to be well maintained and operated. Moving parts to be regularly lubricated. All vehicles must be driven slowly around site.

Table 4.7 - Noise Management Table

4.8 Complaints procedure

4.8.1 Any third party complaints received will be recorded on the Complaints Form and will include a record of the complaint, particulars of the complainant and details of any action taken to alleviate the problem to ensure the likelihood of a future third party complaint is minimised. See Appendix 4

5 Emergency & Contingency Procedures

5.1 General

- 5.1.1 In addition to obligations imposed by RIDDOR '13 (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013) the permit holder will notify the EA of any serious injuries to employees and other site users or members of the public arising as a result of operations on site. Minor injuries such as cuts and grazes etc. will be recorded in the accident book on site.
- 5.1.2 For all emergency situations, the deposit of any further waste will be suspended where necessary to allow action to be taken safely. If necessary, staff and other users of the site will be evacuated to an area which is a safe distance away from the hazards.

5.2 Fire

- 5.2.1 The site has a Fire Prevention Plan which has been prepared in accordance with EA guidance to meet the following three objectives :
 - minimise the likelihood of a fire happening
 - aim for a fire to be extinguished within 4 hours
 - minimise the spread of fire within the site and to neighbouring sites

See Fire Prevention Plan for further details.

5.2.2 For quick reference, the following actions will be taken when fire is detected or suspected during operational hours:

STEP 1 SAFETY	 ALERT ALL STAFF (CALL EMERGENCY SERVICES ON 999 IF REQUIRED) IF FIRE IS IN MAIN BUILDING THE AUTOMATIC SUPPRESSION SYSTEM WILL COME ON IF THE FIRE IS IN THE EXTERNAL YARD THE OWNER CAN TURN ON THE SPRINKLERS REMOTELY EVACUATE AFFECTED AREA CONDUCT ROLE CALL IF REQUIRED
STEP 2 EXTINGUISH	 IF SAFE TO DO SO SHUT DOWN ELECTRICS, MOVE MECHANICAL EQUIPMENT AWAY AND SHUT DOWN. IF SAFE TO DO SO USE A SUITABLE EXTINGUISHER AND/OR WATER HOSES/SOIL IF EMERGENCY SERVICES ARE USED DIRECT THEM TO THE FIRE AND SUPPORT THEM WITH IDENTIFYING POTENTIAL SOURCES OF IGNITION SUCH AS FUEL STORES
STEP 3 CONTAIN CLEAR UP	 IF SAFE TO DO SO IMPLEMENT FIRE WATER CONTAINMENT MEASURES I.E. SANDBAGS AND SURFACE WATER GULLEY COVERS. WHEN FIRE IS EXTINGUISHED ENSURE REMOVAL OF CONTAMINATED MATERIAL COMPLETE INCIDENT REPORT AND IMPLEMENT IMPROVEMENT MEASURES WHERE POSSIBLE, UPDATE FIRE PLAN WHERE NECESSARY
STEP 4 IMPROVE	 INSPECT INFRASTRUCTURE OF SITE FOR ANY DAMAGE CAUSED BY THE FIRE COMPLETE INCIDENT REPORT, MAKE NOTE IN SITE DIARY IMPLEMENT IMPROVEMENT MEASURES WHERE POSSIBLE AND UPDATE FIRE PLAN IF NECESSARY

Outside of operational hours the following procedure will be followed.

STEP 1 ALERT	 BT REDCARE WILL ALERT THE OWNER DIRECTLY AND WILL ALSO CONTACT THE EMERGENCY SERVICES. THE OWNER WILL ALSO BE ALERTED BY CCTV ON THEIR PHONE. IF THE FIRE IS IN THE MAIN BUILDING THE AUTOMATIC SUPPRESSION SYTEM WILL TURN ON AND START TO EXTINGUISH THE FIRE, IF THE FIRE IS IN THE EXTERNAL YARD THE OWNER CAN TURN ON THE SPRINKLERS REMOTELY.
STEP 2 EXTINGUISH	 IF SAFE TO DO SO USE A SUITABLE EXTINGUISHER AND/OR WATER HOSES/ SOIL IF EMERGENCY SERVICES ARE USED DIRECT THEM TO THE FIRE AND SUPPORT THEM WITH IDENTIFYING POTENTIAL SOURCES OF IGNITION SUCH AS FUEL STORES
STEP 3 CONTAIN CLEAR UP	 IF SAFE TO DO SO IMPLEMENT FIRE WATER CONTAINMENT MEASURES I.E. SANDBAGS AND SURFACE WATER GULLEY COVERS. WHEN FIRE IS EXTINGUISHED ENSURE REMOVAL OF CONTAMINATED MATERIAL COMPLETE INCIDENT REPORT AND IMPLEMENT IMPROVEMENT MEASURES WHERE POSSIBLE, UPDATE FIRE PLAN WHERE NECESSARY
STEP 4 IMPROVE	 INSPECT INFRASTRUCTURE FOR ANY DAMAGE CAUSED BY THE FIRE COMPLETE INCIDENT REPORT, MAKE NOTE IN SITE DIARY IMPLEMENT IMPROVEMENT MEASURES WHERE POSSIBLE AND UPDATE FIRE PLAN IF NECESSARY

5.3 Breakdowns

5.3.1 In the event of plant breakdowns, alternative plant will be sourced until the existing plant is repaired to prevent potential over stockpiling of waste. If an alternative plant cannot be used then waste will be stored securely until the plant is repaired and if necessary, waste will be diverted to an alternative site. The repair will be carried out at the most convenient location with absorbents used to clear oil or fuel spillages; most likely on the concrete surface.

5.4 Spillages

5.4.1 Fuel which may be stored on site will be contained within a bunded receptacle/container to contain any primary leaks. If any oil and vehicle maintenance chemicals are kept on site, they will be stored securely. In the event of a spillage a spill containment kit (absorbent pads, booms or granules) will be used to prevent further spillage and the contaminated absorbents placed in a skip for disposal to a suitably permitted facility.

6 Training for Site Staff

6.1 Training needs assessment

- 6.1.1 All new and existing site staff receive specific training based on their responsibilities to ensure all operations are carried out without harm to the environment or amenity of the surrounding area. Training in all aspects of the site and waste operations at the site with regard to the individual responsibilities of the site staff will help to prevent incidents occurring which may have an adverse impact on the environment and/or the employees and their co-workers.
- 6.1.2 An employee training record is kept for each individual which details a list of the training needs of all site staff and also serves as a training review for existing site staff which will be carried out annually or a period set at the operator's preference.

6.2 Fire safety / firefighting training

6.2.1 Regular fire drills are undertaken by site management to ensure proper procedures are followed by employees in the unlikely event that a fire incident occurs. Please see Fire Prevention Plan for further information

6.3 Recognition of waste types training

6.3.1 All employees are given induction training and subsequent regular training to identify those waste types which are permitted for acceptance at the site under the EP and those wastes which are not. This will include specific training to identify those common wastes which may be found following deposit and are not permitted at the site and will also include more obscure wastes and how to handle these wastes safely. All employees are advised that they should refer any unrecognisable or unknown wastes to senior management, who should, in turn, follow procedures outlined in the EMS and/or contact the EA to agree a suitable method for removal.

6.3.2 Training is provided to all site users who handle waste on site and those in charge of administration and reporting. Training will also be provided to drivers responsible for collecting wastes from the site of production who will then be able to advise the producer that an alternative facility must be sought for any non-compliant wastes.

6.4 Plant operation training

6.4.1 Any employees who are required to operate loading or treatment plant for the movement or processing of waste will be required to undertake the necessary qualifications for the operation of the specific item of plant in question. This will be required prior to operating the plant and will be obtained through necessary external certification programmes.

6.5 Permit / Management System training

6.5.1 All employees will be inducted into the operating conditions as prescribed in the EP for the site. Whilst much of the above training will provide specific guidance on many aspects of these documents, all employees will be made aware of the location of the EP and EMS in the site office. All managerial positions will be made fully aware of the sites operating conditions.

7 Site closure plan

- 7.1 In the event that the site ceases to operate as a waste transfer/treatment facility as set out in the site's EP, the following steps will be followed to achieve site closure:
 - a) Contact the EA to advise the Environment Officer(s) that the site plans to cease / has ceased the acceptance of wastes under the permit.
 - b) The amount of residual processed and unprocessed waste on site will be assessed by the TCM to set a timetable for the final processing and timely removal of waste from site.
 - c) Following removal of all waste, plant and machinery from site a Site Investigation will be undertaken to ascertain the ground conditions of the land to which the site relates.
 - d) A surrender application will then be submitted to the EA for determination.

8 Climate Change

Risk is the probability of an individual being exposed to an work place hazard and the impact of such exposure. The Primary risk is assessed with no mitigation in place such as managerial procedures and Personal Protective Equipment (PPE).

Probability

Probability of exposure

HIGH – exposure is probable: direct exposure likely with no / few barriers between hazard, source and receptor.

MEDIUM – exposure is fairly probable: feasible exposure possible, barriers to exposure less controllable.

LOW – exposure is unlikely: several barriers exist between hazards source and receptors to mitigate against exposure.

VERY LOW – exposure is very unlikely; effective, multiple barriers in place to mitigate against exposure.

Consequence

Consequences of Exposure

HIGH – the consequences are severe: sufficient evidence that short or long term exposure may result in serious damage.

MEDIUM – consequences are significant; sufficient evidence that exposure to hazard may result in damage that is not severe in nature and reversible once exposure ceases (e.g. irritant).

LOW – consequences are minor; damage not apparent though reversible adverse changes may occur.

VERY LOW – consequences are negligible; no evidence of adverse changes following exposure.

Risk Matrix

		Consequences				
		Very Low	Low	Medium	High	
_ikelihood	High	Low	Medium	High	High	
	Medium	Low	Medium	Medium	High	
	Low	Low	Low	Medium	Medium	
	Very Low	Very Low	Low	Low	Low	

For all hazards identified either procedures or PPE have been developed. Residual risk will remain and are detailed in the tables below.

Non-hazardous and inert waste treatment Risk Assessment

	Impacts	Risk Level (Likelihood X Consequence= Risk)		ood X k)	Mitigation Consideration F	Retained Risk
	Impact 1 Potential for increased waste reactions or fires involving heat sensitive or combustible waste.	L	Μ	Μ	 Heat sensitive wastes are stored either in the main roofed building or in external bays covered by misters. There is suitable segregation and separation distances 	М
Summer daily maximum temperature This may be around 7°C higher compared to average summer temperatures now.	Impact 2 Dry vegetation in and around hot cutting areas presents an increased fire risk.	VL	VL	VL	 There is no dry vegetation in the operational areas There is no hot cutting areas Visual inspections for fire, site monitored by CCTV cameras. 	Very Low
	Impact 3 Potential increase in high temperature expansion and stress of plant, pipework and fittings.	L	L	L	 Regular inspection of equipment and site infrastructure Regular maintenance of plant. Minimal plant, pipework & fittings on site 	L

	Impact 4 Potential increased dust emissions from processing areas and site roads.	L	L	L	 Regular housekeeping of site Localised dust suppression system on site. Waste received is not a dusty waste. 	
	Impact 5 Stockpiled food and drink containers, food contaminated wastes and 'black bag' type wastes:	L	L	L	Waste stream not accepted.	
Winter daily maximum temperature This could be 4°C more than the current average with the potential for more extreme temperatures, both warmer and colder than present	Impact 1 Slightly higher winter maximums could generate regular odour complaints and pest infestations.	L	L	L	 Waste stream is not known to cause odour complaints. No odorous waste accepted under waste acceptance procedure. 	
	Impact 2 Lower winter temperatures could result in an increased risk of pipes (or similar) freezing.	L	L	L	 Regular inspection of equipment and site infrastructure Regular maintenance of plant. 	

Daily extreme rainfall Daily rainfall intensity could increase by up to 20% on today's values.	Impact 1 Potential for increased site surface water and flooding.	L	Μ	Μ	 Ensure susceptible assets are located in an area of the site that minimises the risk of damage from flooding. Avoid the design or permanent or critical infrastructure in areas at risk. 	М
	Impact 2 There is potential for drainage systems and interceptors to be overwhelmed.	L	М	Μ	 drainage systems are inspected and maintained 	М
Average winter rainfall	Impact 1 Potential for increased site surface water and flooding	L	Μ	Μ	 Site drains away from the waste storage areas drainage systems are inspected and maintained 	М
Average winter rainfall may increase by over 40% on today's averages.	Impact 2 Potential for drainage systems and interceptors to be overwhelmed.	L	Μ	Μ	 drainage systems are inspected and maintained external areas where wastes are handled or stored are provided with sealed drainage 	М

Sea level rise Sea level rise which could be as much as 0.6m higher compared to today's level.	Impact 1 If a site is located near the coast there is potential increased risk of flooding.	VL	VL	VL	•	Site is not located near the coast	VL
Drier summers Summers could see potentially up to 40% less rain than now	Impact 1 Potential increased use and reliance on mains water for dust suppression, cleaning and fire water.	L	L	L	•	Mains water is adequate	L
River flow The flow in the watercourses could be 50% more than now at its peak, and 80% less than now at its lowest.	Impact 1 Increased impact from on-site drainage systems where they are connected to watercourses.	VL	VL	VL	•	Drainage system is not connected to watercourse.	VL
	Impact 2 Increased risk of water course flows being too high to allow discharge and drainage backs up on site.	VL	VL	VL	•	Not applicable to site.	VL

9. Review of Management System

- 9.1.1 The Management System will be reviewed in its entirety at least annually or following any substantial change in site operations or complaint.
- 9.1.2 Other activities which may prompt review of the Management Plan are variations to the environmental permit, accident, complaint, breach or a change in the site setting or sensitive receptors.
- 9.1.3 Where the review results in required changes, this will be documented and maintained with the site records, for example, waste storage volumes, changes to abatement measures, new or altered equipment.

Appendix 1 Rejected Waste Form

G & C WASTE PAPER LTD REJECTED WASTE - RECORD FORM

Appendix 2 Daily Checklist

Week ending	Monday	Tuesday	Wednesday	Thursday	Friday
Checked By (Initials)					
Paperwork (transfer notes)					
Gates /Fences – trespass, vandalism					
Signage condition					
Drainage system					
Plant – general condition/maintenance					
Check condition of site buildings					
Diesel tank and bund integrity					
Is Quarantine Area clear?					
Fire Fighting Equipment					
Integrity of concrete surfacing					
Integrity of bay walls					
Dust Suppression (functioning)					
Is waste within bays?					
Are all liquids bunded?					
Evidence of spillages/leaks					
Spill Kits available					
Any loose litter on site or escaping off site					
Any bad odour on site or escaping off site					
Any pests on site (rats, birds, flies etc)					
Any loud noise / vibration on site					
Site diary entries					
Any mud on access road / entry to site					

NOTES

Appendix 3 Training

G & C WASTE PAPER LTD

EMPLOYEE TRAINING NEEDS ASSESSMENT / REVIEW

EMPLOYEE NAME				DATE COMPLETED						
POSITION					REVIEW DUE					
TRAINER			OUTCOME	OUTCOME PASSED						
POSITION						FUR	THER TI	RAINING REQUIRED		
CARRIED OUT /SIGN OFF >	Y/N	SIGNED BY EMPLOYEE	SIGNED BY TRAINER				Y/N	SIGNED BY EMPLOYEE	SIGNED	BY R
ENVIRONMENTAL PERMIT				FIRE PREVENTION PLAN						
MANAGEMENT SYSTEM				FIRE SAFETY						
SITE RULES				EMERGENCY PROCEDURES						
RECORD KEEPING / TRANSFER NOTES				STORAGE /PILE SIZE LIMITS						
RECOGNITION OF WASTE TYPES				STORAGE DURATION						
SECURITY				FIRE DETECTION						
VEHICLE CHECKS				FIRE ALARMS						
PLANT OPERATION				FIRE	FIGHTING EQUIPME	NT				
PLANT CHECKS				FIRE WATER CONTAINMENT MEASURES						
AMENITY - LITTER, ODOUR, PESTS etc.				SPIL	L CLEARANCE					
NOTES AND ACTIONS:										

Appendix 4 Complaints Form

G & C WASTE PAPER LTD

COMPLAINTS REPORT FORM

Date Recorded:	Reference Number:
Name and address of caller	
Telephone number of caller	
Time and Date of call	
Nature of complaint (noise, odour, dust, other) (date, time, duration)	
Weather at the time of complaint (rain, snow etc.)	
Wind (strength, direction)	
Any other relevant information	
Potential reasons for complaint	
The operations being carried out on site at the time	
	Follow Up
Actions taken	
Date of call back to caller	
Summary of call back conversation	
	Recommendations
Change in procedures	
Changes to Environmental Management System (EMS)	
Date changes implemented	
Form completed by	
Signed	
Date completed	

Appendix 5 Complaints Procedure

COMPLAINT RECORDING PROCEDURE

Any complaints received will be recorded in the site diary and on the Complaints Form. This form will normally be completed, signed and dated by the Site Manager; if they are not available the Office Manager will complete the form.

- 1) The name, address and telephone number of the caller will be requested (Caller may remain anonymous if they choose to).
- 2) Each complaint will be given a reference number.
- 3) The caller will be asked to give details of:
 - a) the nature of the complaint;
 - b) the time;
 - c) how long it lasted;
 - d) how often it occurs;
 - e) Is this the first time the problem has been noticed; and
 - f) what prompted them to complain.
- 4) The person completing the form will then, if possible, make a note of:
 - a) the weather conditions at the time of the problem (rain, snow, fog etc.);
 - b) strength and direction of the wind; and
 - c) the activity or activities taken place on the site at the time the noise was detected, particularly anything unusual.
- 5) The reason for the complaint will be investigated and a note of the findings added to the report.
- 6) The caller will then be contacted with an explanation of the source of the complaint if identified and the action taken to prevent a recurrence of the problem in future.
- 7) If the caller is unhappy about the outcome or unwilling to identify themselves the caller will be invited to contact the Environment Agency and/or the Local Authority.

Note: Following any complaint the relevant management plan(s) will be reviewed to ensure appropriate actions are in place to counter any problems.

Appendix 6 Site Plan



Appendix 7 Daily Housekeeping Checklist

DATE	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
CHECKED BY (INITIALS)						
IS SITE CLEAR OF ANY BUILD UP OF DEBRIS? INCLUDING ON AND AROUND THE PLANT AND MACHINERY. MAINTAIN GOOD HOUSEKEEPING.						
HAS THE SITE SURFACE BEEN SWEPT AND CLEARED OF DUST AND DEBRIS? MAINTAIN CLEAR SITE SURFACE.						
HAS THE SITE SURFACE BEEN DAMPED DOWN TO STOP RESUSPENSION OF ANY DUST? KEEP SITE SURFACE DAMPED DOWN IN DRY WEATHER.						
ARE ALL WASTES SECURELY CONTAINED? PLACE ANY LOOSE LITTER OR DEBRIS IN RELEVANT WASTE STORAGE AREA.						
ARE ALL OTHER STORAGE AREAS CLEAR AND SAFE KEEP AREAS TIDY & SAFE TO AVOID SLIPS TRIPS AND FALLS						
HAS ALL PLANT BEEN CLEARED OF DEBRIS AND WIPED DOWN DAILY? NO WASTE SHOULD BE ALLOWED TO BUILD UP ON ANY PLANT OR VEHICLE						
ARE BAYS SWEPT & CLEARED OF WASTES WHENT EMPTIED?						
BAYS MUST CLEARED REGULARLY.						