



ENVIRONMENTAL MANAGEMENT SYSTEM

Tetbury Commercial Recycling Centre

Waste Recycling & Transfer Facility

(Permit No: EPR/LB3700LZ)

At:

**Babdown Airfield
Beverstone
Tetbury
Gloucestershire
GL8 8YL**

Operator Details:

**Main Office: McCarthy Marland(Recycling) Ltd
Babdown Airfield
Beverstone
Tetbury
Gloucestershire
GL8 8YL**

CONTENTS

Section 1	<i>Introduction & Site Management</i>
Section 2	<i>Identification of Risk</i>
Section 3	<i>Permitted Site Activities & Waste Acceptance</i>
Section 4	<i>Management Competency and Staffing</i>
Section 5	<i>Site Construction Works & Infrastructure</i>
Section 6	<i>Site Security</i>
Section 7	<i>Site Operations</i>
Section 8	<i>Emissions, Monitoring & Amenity Considerations</i>
Section 9	<i>General Housekeeping</i>
Section 10	<i>Information & Record Keeping</i>

APPENDICES

Appendix 1	<i>Permitted Area Plan (EA approved on 24/01/2011)</i>
Appendix 2	<i>Site Layout Plan</i>
Appendix 3	<i>Accident Management Plan</i>
Appendix 4	<i>Updated Environmental Risk Assessment</i>
Appendix 5	<i>Fire Prevention Plan</i>
Appendix 6	<i>Odour Management Plan</i>
Appendix 7	<i>Dust Management Plan</i>

1. INTRODUCTION & SITE MANAGEMENT

1.1. INTRODUCTION:

- 1.1.1** M^cCarthy Marland is a long-established waste recovery, recycling and transfer organisation. It provides an important and expanding service to household, industrial and commercial waste producers within Gloucestershire, Somerset, Oxfordshire, Bristol and surrounding areas.
- 1.1.2** The Company also specialises in the supply of quality stone, gravel, aggregate and sand from the Babdown site. These may be brought to the site by the Company's own vehicles after delivering wastes or recovered materials to authorised outlets elsewhere, or comprise quality products recovered from the mixed wastes segregated and processed at the site.
- 1.1.3** Throughout the operating life of the site new equipment and systems have been introduced to enable ever higher percentages of wastes to be recovered, recycled and reused – as opposed to being disposed of by landfill or incineration. It thus continues to increasingly support European, national and local policy objectives in this regard. Scrap metals (ferrous and non-ferrous), hardcore, aggregate, stone, soils, sand, timber, glass (cullet), paper, card and plastics are all recovered (as economics permit) from the mixed wastes received.
- 1.1.4** To assist the Company in the above objectives **planning approval** was given by Gloucester County Council on the 16th January 2010 to an extension of the site area. Subsequently, on the 21st January 2011, the EA agreed to an application to change the Licence to a '**Standard Rules Environmental Permit**' and increase the permitted area to coincide with that of the revised planning consent.
- 1.1.5** A further application is being made to the Environment Agency to convert the Standard Rules Permit back to the Bespoke format, as it was originally issued. The application is made to regularise the external storage of some materials, which is not addressed in the Standard Rules, and also to increase the annual throughput to 100,000 tonnes.

1.2. SITE MANAGEMENT:

- 1.2.1** The waste management activities, and the measures adopted for their control and for conducting the site operations in such manner that environmental and nuisance risks are minimised, were previously enshrined in the approved site 'Working Plan' which accompanied the (then) Waste Management Licence. This principle remains the same under the 'Permitting' regime. The Permit requires Permit Holders to draw up similar detailed statements of their site operations; including infrastructure, environmental controls, methods of operation, staff training, record keeping etc, but in the form of a 'written management system' (EMS). This EMS has therefore been prepared on that basis, and its adoption and implementation by M^cCarthy Marland should ensure that the operations at Babdown continue to remain free from being causal to any environmental pollution, harm or detriment.

- 1.2.2 Although a return to a bespoke Permit is proposed the activities are those already set out in this EMS, with only minor amendments made in relation to comments received during routine inspection of the site by the EA. The move back to a bespoke Permit has generated a review of the Environmental Risk Assessment and an updated Fire Prevention Plan (FPP) to reflect current EA guidance.
- 1.2.3 The duly making process has required drafting of an odour management plan and a dust management plan. These form appendices to this EMS and therefore this document has been updated to reference them.
- 1.2.4 The EMS will be reviewed against the activities at the site or following a major incidence or significant operational or environmental issue – whichever occurs first. This may or may not give rise to the need to update the document.
- 1.2.5 The management of the operations is in the hands of the management team of M^cCarthy Marland. A Technically Competent Manager forms part of that team.

2. **IDENTIFICATION OF RISK**

- 2.1 **Methodology:** As described above, the EA has published *risk assessments* for Standard Rules Permits. These include **Standard Rules Set Number 3** (Household, Commercial & Industrial Waste Transfer Station with Treatment) Although a Bespoke Permit is sought this has been adopted and adapted by the Permit Holder as the format for evaluating and overcoming potential environmental risks at the site, and is associated with this EMS as *Appendix 4*.

3. **PERMITTED SITE ACTIVITIES & WASTE ACCEPTANCE**

- 3.1. **The Permitted Site Area** is the land edged green included with the Permit as ‘Schedule 1’. A copy of the plan is appended to this EMS as *Appendix 1*. The Permit Holder undertakes to ensure that all waste activities at the site occur only within that boundary.
- 3.2. **Permitted Site Activities:**
 - 3.2.1 The waste activities that may take place at the facility are those specified under within the Permit to include; the storage, sorting, separation, screening, baling, shredding, crushing and compacting of the **permitted waste types** into different components for disposal or recovery. The locations of the site where these operations occur are set out in the revised site layout plan (SLP) attached to this EMS as *Appendix 2*.

3.3. Permitted Hours of Operation:

3.3.1. The hours approved through the Planning Consent are:

-Mondays to Fridays 07.00hrs to 17.30hrs
-Saturdays 07.00hrs to 14.30hrs
- Sundays No working
- Bank Holidays No working

3.4. Waste Acceptance:

3.4.1 The Site only accepts wastes that conform to the approved range of wastes listed within the Permit .

3.4.2 **The Permit** also restricts the annual throughput of wastes at the site to 100,000 tonnes per annum, and limits acceptable wastes to those of a dry nature only, excluding wastes that are solely or mainly dusts, powders or loose fibre.

3.5. Potential Environmental Risks from the Above Activities:

3.5.1 In relation to the above permitted wastes and related recovery and recycling operations, and with due reference to the Risk Assessment (*Appendix 4*), the potential environmental risks that could arise unless carefully controlled by the Permit Holder are:

- (i) Dust
- (ii) Litter
- (iii) Fouling of adjacent Roads
- (iv) Odours arising from the wastes.
- (v) Noise and vibration from vehicles attending the site and from processing of the wastes.
- (vi) Scavenging by birds or animals.
- (vii) Breeding of flies and insects.
- (viii) Flooding within the facility.
- (ix) Physical harm to visitors or intruders from on-site hazards such as vehicles, plant and equipment.
- (x) Fire due to site accident or arson.
- (xi) Liquid spillages, leachates from the wastes, contaminated surface waters.

3.5.2 The EA’s guidance further advises that the following matters should also form part of the written Environmental Management System:

- installation, operation, inspection & maintenance of site equipment
- accident management
- staff training and technical competence
- operating instructions (as appropriate)
- complaints and incidents procedure
- site security arrangements (including site notice board)
- record keeping and availability of the Permit
- control and monitoring of emissions

- waste acceptance procedures

3.5.3 The manner in which the Permit Holder manages both of the above sets of criteria, and ensures their full control and documentation, is detailed in the following sections of this EMS.

4: MANAGEMENT COMPETENCE AND STAFFING

4.1. Management Competence:

The management of the operations is in the hands of the management team of M^cCarthy Marland . A Technically Competent Manager forms part of that team and the details of certificates and continuing competency can be confirmed on EA site visits.

4.2. Required Level of TCM Attendance:

4.2.1 The Permit stipulates that **‘the site operator shall manage & operate the facility using sufficient competent people’**.

The Company ensures that the TCM is present at the site for at least 12hrs during each operational week. Compliance is demonstrated by a weekly attendance record in the **Site Daily log** .

4.2.2 The Permit stipulates that **“the operator shall comply with the requirements of an approved competence scheme”**.

TCM(s) will achieve this by taking the on-line WAMITAB / CIWM Continuing Competence Test every two years as required.

4.2.3 Site Personnel: There are 48 operatives in total. These comprise administrative staff, site operatives and labourers, drivers, three fitters and supervisors. All operatives are trained appropriately according to their specific tasks. They are made aware of the existence and importance of the Environmental Permit and of this written Management System, and copies are freely available for their examination. They are instructed in the need to take all reasonable measures, when undertaking their duties, to safeguard their health, the environment and local amenities, and of the need to conform at all times to the regulatory requirements of the Permit

4.2.4 Training & Competence Record: A record of all staff training (internal & external), including any formal qualifications will be maintained at the site and updated routinely.

5. SITE CONSTRUCTION WORKS & INFRASTRUCTURE

5.1.Site Preparation:

5.1.1 Original Site Preparatory Works:

(i) Prior to its acquisition by Valley Trading in 2001 the site was rough grassland. It was classified as a ‘brownfield’ site due to its historic use as an airfield. Existing soils were stripped, the site levelled and partially surfaced with concrete (min of 200mm thickness on a compacted hardcore base) and partially with hardstanding (clean crushed hardcore & aggregate).

(ii) The planning consent required substantial earth bunds to be created around the majority of the site as a visual screen and noise barrier, and to provide site security. The agreed height for these is now 5.5metres which requires a base of up to 25metres width to enable structural stability and safe landscape management of the reinstated surfaces. These bunds were built using imported inert materials under a registered exemption (regulation 17 of the 1994 Regulations) and from surplus materials excavated during the site preparation work. The stripped top soils from the site were used in the reinstatement of these bunds and are currently subject to shrub planting to further enhance the visual appearance of the site and its security.

5.1.2 Subsequent Site Construction Works & Infrastructure Provision:

(i) A substantial site control office, staff amenity and workshop complex has been installed inside the northern boundary of the site adjacent to the main site entrance. A spacious, impermeably paved car parking area has been constructed to the side & rear of this complex. Two weighbridges are located just within the site entrance and electronically linked to the site office block. Good security arrangements have been introduced at the site, and these are described at **Section 6** below.

(ii) A large metal clad waste reception and recycling building (**WRB**) has been constructed on the southeast corner of the site. This was extended late 2017/ early 2018. It provides for the majority of the various waste processing, sorting and recovery operations to occur within its confines and on its concrete base. This base being constructed to a strength of 35Nm² and minimum thickness of 250mm.

(iii) Extensive concrete paving has been installed around the **WRB** on which to safely store wastes and undertake certain segregation processes. It has been extended to provide a wide, safe vehicular access road from the entrance gates to the **WRB**. The concrete was laid to the following specification; strength - 35Nm² and minimum thickness of 200mm. It is intended that increasing areas of the site will be concreted as the business develops.

(iv) Drainage from within the **WRB** is directed to sealed sump outside the building close to the surface water collection system and inside the tipping reception area. These are pumped out as necessary for authorised disposal elsewhere via an authorised and licence contractor. The levels are checked as part of the site daily log, walk around check. This can be seen in **Appendix 7**

(v) Other operational areas of the site are constructed from either impermeable paving or good quality compacted and level hardcore. The hardcore areas are

utilised only for the storage and processing of '*specified waste*'. A list of these permitted *specified* wastes is given in the Permit..

(vi) The site also utilise concrete storage bays for the storage of wood prior to its collection for off site further recycling. Green waste and plastic may be in a container or in a bay. The FPP now limits the amount of these materials and the duration they can be stored. Additionally the “fines” ie the non recyclable element left after the processes in the WRB have been completed, are stored externally, on a concrete surface and with contained drainage.

(vii) The following mechanical plant has, progressively, been installed to assist in the recovery of increasing percentages and types of waste:

- A static waste separation plant has been built within the **WRB**. This comprises of a continuous conveyor belt feeding mixed wastes through a screen, various magnets and an enclosed hand-separation line, to enable cardboard, plastics, non-ferrous metals, ferrous metals wood and inert materials to be individually 'picked' or mechanically separated, with metals extracted via various magnets.
- Mobile & 'fixed' rotary screens ('trommel' type) & (3-way split type) to enable different grades of aggregates and soils to be produced and recovered from mixed inert wastes.
- Mobile 'finger' screen – again to enable specific aggregate grades to be produced at the site for re-use elsewhere.
- Mobile stone crushing plant on site to process stockpile of segregated inert wastes.
- Waste baling machine to densify segregated plastics, paper and card etc into bales.

(viii) Mains water, telephone and electricity supplies are all installed at relevant areas of the site.

5.2. Infrastructure Location, Inspection & Maintenance:

5.2.1 The plan provided with the appended FPP shows the approximate locations of the above infrastructure. As described above, much of the plant in use is of mobile type, and thus its precise location within the site at any time may vary depending upon work load and available space etc.

5.2.2 **General Inspection & Maintenance:** Items (i) to (x) above (in paragraph 5.1.2) are inspected daily by a responsible person during the 'daily site walk around' and the findings reported in the **site daily log**. Should any infrastructure appear deficient in any way, or damaged or worn out etc, this will be detailed in the **daily log** and remedial work or replacements arranged as soon as possible to a standard no less than that when new. Once the matter has been satisfactorily dealt with, this will also be record in the **daily log**.

6: SITE SECURITY

6.1. Current Provision:

- 6.1.1** As described, soils stripped from the site during its preparation were used in the construction of the landscaped bunds that now surround much of the site (see **Appendix 2**). These bunds are of significant size – some 25m wide and some 5.5m high. Further security for these boundary sections is provided by dense planting of trees and shrubs along their lengths – which is also valuable in the visual improvement of the facility.
- 6.1.2** The boundaries of the site are further secured by the provision of a range of fencing and walling and gates at the site entrance. These are locked shut at all times when the site is unattended.
- 6.1.3** The site is alarmed and floodlighting has been provided for all key operational areas. In addition, CCTV monitors the main site areas. (Workshop, Offices, WRB etc).
- 6.1.4** The WRB is gated at all three vehicle entrances and has doors for the pedestrian entrances. These are closed and locked when the facility is closed.

6.2. Site Identification Board:

6.2.1 A site prominent identification board is provided close to the site entrance. This is constructed from durable materials and clearly displays the following information:

- Site name and address.
- Permit Holder's (Company) Name.
- Permit Number.
- Emergency contact name and telephone number.
- A statement that the site has been Permitted by the Environment Agency.
- The Agency's national 'phone numbers: 03708 506 506 (for general enquiries) and 0800 807060 (incident hotline).
- Days and hours when the site is open to receive waste.

As well as providing key information to site visitors, this level of information should also be sufficient to enable any concerned individual to alert the Company or the EA to any problem during non-operational hours. It will be maintained in a fully legible condition.

6.2.2 Visitors:

i) All visitors to the site are required to report to the site office on arrival and to sign the visitors' book. No one will be allowed to attend the operational areas or recycling building unless on official business or accompanied by the site management.

ii) In the event of unauthorised intrusion, the circumstances will be entered in the **site daily log**. Should additional security measures appear necessary these will be discussed in advance with the EA.

6.3. Inspection and Maintenance of Security Provision:

- 6.3.1** Gates are locked at all times when the site is unattended.
- 6.3.2** Fencing, planted boundaries, walls gates and the notice board are inspected during the daily site walk around to assess their continuing integrity. In the event of damage or failure of any constituent part, temporary repairs (at least) will be instigated before the end of that working day to ensure that the site remains secure. Full repair or replacement as necessary will be affected as soon as practicable.
- 6.3.3** The findings of the inspections are reported in the **site daily log** and the details of any necessary remedial work together with the date of its completion will be recorded in the **site daily log**.

7. SITE OPERATIONS

7.1. Waste Quantity Measurement & Related Records:

- 7.1.1** Two vehicle weighbridges are provided at the facility, located adjacent to the concrete haul road to the **WRB and** close to the site entrance. They are linked electronically to the site control office, providing digitised records of the wastes entering and leaving the facility. They were professionally installed and are professionally inspected, checked, maintained and stamped accordingly to the specified weights and measures standards and in accordance with the manufacturer's recommendations.
- 7.1.2** Comprehensive records are kept of the types (including the appropriate LoW codes) and quantities of wastes, and these records (including transfer notes & consignment notes) also contain details of; the origin and /or destination the wastes, supplier and /or transferee, dates and times of all transfers, identity and authorisation of carriers / transferees and carrier vehicle registration numbers. A copy of these records (in electronic and /or paper form) is kept within the site office and is available for inspection, as required, by an authorised officer of the EA.
- 7.1.3** In the event of weighbridge failure, there is a secondary weighbridge to use as a backup. In case of failure of both weighbridges which is extremely unlikely the weights will be estimated using accepted volume to weight conversion factors.

7.2. Summary of the Permitted Site Treatment & Transfer Processes:

- 7.2.1** Permitted Processes; the waste management activities taking place at the site are those listed in the Permit namely: sorting, separation, screening, baling, shredding, crushing or compacting of the permitted wastes into different components for (as appropriate) reuse, recycling or recovery. Each of these activities is likely to be put into practice at the site during the currency of the Permit.
- 7.2.2** Recovered materials that meet an approved standard may be transferred from the site for direct reuse elsewhere; whilst others may be delivered to specialist organisations for further processing before full recovery is achieved (e.g. scrap metals). Non-recoverable residues are transferred to authorised disposal facilities elsewhere.

7.3. Management of the Permitted Site Treatment & Transfer Operations (*including Control of Deliveries & Dispatch*):

- 7.3.1** All site operations are directed towards the recycling, recovery and/or transfer of essentially non-putrescible household, industrial and commercial waste arisings from Gloucestershire and Bristol. These operations are described as follows:
- i) The facility principally receives wastes comprising rubble, hardcore, soils, foundry sand, timber, paper, card, plastics, glass and metals. These may arise from

household, commercial and industrial sources in any and in varying proportions depending upon the supplier and economic circumstances.

ii) All loads are inspected in a limited capacity upon collection from customers premises.

iii) Closer inspection then follows at the tipping stage (tipping floor of the **WRB** or outside storage area in the case of inert waste). If the operator is unsatisfied with any particular item(s) then the driver is required to either return it to the supplier or quarantine in a secure container or bund pending further investigation. In the event of such action being necessary the details will be entered in the **site daily log and non-conformance folder**.

iv) Similar scrutiny continues during the storage and processing of the wastes, with the operators trained to take appropriate action if they spot any suspicious material. Such action may include professional investigation of the offending waste and, possibly, specialist removal. The Environment Agency may be consulted over such ‘rogue’ finds and its advice taken as appropriate.

v) In the event of gas cylinders or furnishings likely to contain POPS being found in a delivery, these are transferred to a free venting area outside the Building for safe storage pending removal through one of the specialist collection schemes.

vi) Any lead acid batteries delivered to the facility are stored separately, inside the building, in an acid resistant leak-proof container. Hazardous waste consignment notes are raised prior to their removal from the site.

vii) Wastes (as opposed to recovered products which have ceased to be waste) dispatched from the site for further treatment, disposal or recovery are fully described, quantified and appropriately containerised in accordance with the Duty of Care. They are transported only by authorised waste carrier and dispatched only to authorised outlets. In the event of any quarantined wastes being held at the site which is known to be hazardous, this will be removed within 14 working days of its receipt wherever possible. Other quarantined waste will (where possible) be removed from the site to authorized outlets as soon as is practicable.

viii) Inert Waste Deliveries: If the delivered wastes are wholly inert they are tipped within the ‘inert waste storage are identified on the **SLP (Appendix 2)** and with the aid of a mobile machine, sorted according to size, for possible mechanical size reduction at the site to an appropriate quality standard for reuse in construction works or hardstanding elsewhere.

ix) Manual and/or mechanical sorting of the mixed wastes then takes place to recover as much scrap metal (ferrous and non-ferrous), timber, plastic, cardboard and green waste as possible. These materials are stored within bays underneath the sorting plant/ picking station (within the **WRB** or outside on concrete) pending further treatment or removal to an authorised facility elsewhere for recycling.

Depending upon its apparent composition, the screened residual waste may be dealt with in one of two ways:

a) The clean soil, stone, concrete or aggregate residual may be transferred to the

outside inert waste storage area (see **SLP**) for direct reuse elsewhere, or for further screening or size reduction before such reuse, by way of the various types of plant described earlier.

b) Residual comprising mixed rubble, concrete, stone and soils etc it may be fed by mechanical shovel with 360° grab action into the hopper of one of the mechanical rotary waste separation (Trommel-type) screens at the site for type separation and particle size grading. The screened product(s) are then transferred to the inert waste storage area pending reuse or disposal elsewhere (depending upon particle size and quality).

c) Residual mixed waste that come of the end of the belt from the static sorting plant is sent for incineration or landfill depending on various factors at the time or removal.

7.4. Other Site Environmental Management Considerations:

7.4.1 Fuels are stored in modern, purpose built, bunded fuel stations. Lubricating oils and any other liquids used in the operation or maintenance of the Permitted Site (cleansing fluids, paints etc) are stored in the secure and impermeably surface workshop, under cover. Containers are labelled clearly with their contents.

7.4.2 The capacity of the fuel tank bund is at least 110% of that of the fuel tank itself and it is filled and emptied with great care to ensure minimal risk of any spillage by a professional authorised contractor. During filling care is also exercised to ensure it is not filled to more than 90% of its theoretical capacity - to allow for expansion in hot weather.

7.4.3 The bunded area, the fuel tank and any other bunded drums containing liquids are inspected periodically and their condition recorded in the **site daily log**. Should there be any sign of damage or likely failure, immediate steps will be taken to repair or replace the offending item and ensure continuing freedom from leakage.

7.5. Classification of the Waste Management Operations

The Environmental Permit lists those waste activities that are permitted at the site. These are as set out below, and the Permit Holder undertakes to ensure full compliance with these limitations in regard to the Permitted waste operations;

Permitted Waste Management Activities	Limits of the Permitted Activities
<p>R13: Storage pending recovery of the waste.</p> <p>D15: Storage pending disposal of the waste.</p>	<p>Treatment consisting only of manual sorting, separation, screening, baling shredding crushing or compaction of wastes into different components.</p> <p>If intended for disposal, no more than 50 tonnes of such waste will be treated per day.</p>

D15: Repackaging (containerisation) of waste prior to its disposal.	No more than 50 tonnes of intact &/or shredded tyres of waste codes 16 01 03 and 19 12 04 will be stored at the site at any one time.
D9: Physico-chemical treatment prior to residues being disposed of	
R3: Recycling or reclamation of organic substances that are not used as solvents.	
R4: Recycling or reclamation of metals and metal compounds.	
R5: Recycling or reclamation of other inorganic materials.	

7.6. Available Spill Kit:

7.6.1 A spill kit is maintained under cover within the facility located within the workshop and in each of the companies HGV vehicles. The granules etc are to be used when dealing with any leakage or spillage of oils or similar liquids from Site Equipment vehicles or from ‘rogue’ oily waste, whilst the lime is held for the neutralisation of any acid that may be spilt or leak from ‘rogue’ batteries or other non-compliant acidic-type waste arising within the site.
Responsible employees are fully trained in the use of the spill kit.

7.6.2 Any containerised residues arising from the cleansing of such spillages will be viewed as ‘Hazardous Waste’ and their removal from the site will conform in full to the Hazardous Waste Regulations 2005 (completed consignment notes / registered carrier etc).

7.6.3 It is the duty of a nominated employee to inspect the spill kit(s) periodically and ensure it remains available, complete and viable, and to report accordingly in the **Site Daily log**.

7.7. Inspection and Maintenance of Operational Plant & Equipment:

7.7.1 All site plant and equipment is inspected by a nominated employee at least once per working week and the findings reported. Should repair, modification or renewal of any plant, equipment or infrastructure appear necessary this will be reported to the site management for appropriate action as soon as possible. On site machinery is periodically checked by the onsite workshop staff and maintenance records, inspection sheets and defect rectification paperwork are kept on site.

8. EMISSIONS, MONITORING & AMENITY CONSIDERATIONS

Point Source Emissions: The only point source emissions from the site are of unpolluted waters from the roof of the **WRB** to soakaway.

Control of Dust & Litter:

8.1 The facility forms part of the Babdown Industrial Estate where indoor and outdoor manufacturing and materials storage and movements commonly occur. Any additional contribution to dust nuisance etc from the operations is thus unlikely to be significant. Further, being located at such a remote spot with residences some considerable distance away, its potential for adverse impact on the local amenity considerations is considered minimal.

8.1.1 Nevertheless, every step is taken to ensure such potential problems remain minimal.

In the event of a dust or litter problem occurring from waste storage areas under (say) high wind conditions, the offending wastes will be damped down or sheeted over to minimise such emissions. Further, under such windy conditions no tipping of wastes will be permitted other than within the enclosed WRB. In addition, as necessary, the concreted surfaces of the site will be swept to remove fine material and damped down during dry, windy conditions using the onsite water bowser or sprinklers.

8.1.2 Should any litter migrate from the storage or tipping areas of the site, this should be noted during the daily site walk around and will be collected up before the end of that working day and containerised for disposal accordingly. If litter is observed beyond the site boundary this will be dealt with similarly. Any complaint of dust /litter being generated at the facility will be acted upon and remedied as a priority and the details recorded in the site daily log before the end of that day.

8.1.3 The site is now subject to a Dust Management Plan which forms part of this EMS.

8.2 Deposits on the Highway:

8.2.1 All loads of waste (both received and dispatched) are required to be sheeted or netted over. The wastes themselves are required to be of an essentially dry nature, and the surfaces upon which they drive before entering or leaving the site are of concrete or tarmac construction (the access road from the main highway to the site is some 1km long). In addition, the internal site roads are frequently swept using the site's own mechanical, motorised brush. *Hence there is very little risk of any such fouling.*

8.2.2 Monitoring: Despite highway fouling being very unlikely, the estate haul road and the highway entrance to it is inspected before the end of each working day and, should any offending material be observed that might have arisen from the site activities, this will be cleaned up immediately. The cause of any such road fouling will be investigated and, where possible, measures taken to prevent or minimise reoccurrence. Records of such events will be entered in the **site daily log**.

8.3. Control of Odours:

- 8.3.1 Due to the physical and chemical nature of the wastes approved for the site, the wastes received do not normally have any objectionable odour. However, it is possible (but highly unlikely) that a particular delivery of wastes may contain odorous ‘rogue’ materials that have escaped the pre-deposit inspection. In such an event, remedial action will be taken immediately, and this may involve priority treatment of the load at the site (sorting, segregation etc) followed by removal and authorised disposal of the offending odorous materials. Any such load and the action taken will be noted in the **site daily log**.
- 8.3.2 Wastes and segregated substances are not stored at the site for unnecessarily long periods thus minimising any odours that could develop as the materials ‘age’.
- 8.3.3 Monitoring:** Simple olfactory (sniffing) monitoring is carried out during the daily site walk around and should any malodor be detected its source will be investigated. If considered to be a problem, the offending material will either be removed from the site before the end of the following day or, depending upon the perceived severity of the problem, will be subject to priority processing and then removed as soon as possible. Any such incidents will be recorded in the **site daily log**.

The site is now subject to an Odour Management Plan which forms part of this EMS.

8.4. Noise and vibration:

- 8.5.1 Due to the remoteness of the site the risk of noise or vibration nuisance from the permitted waste activities is very low. The handling of inert components occurs in the central open area, but this is well screened by the high soil bunds that surround much of the site. In addition, the facility is close to other industrial activities and remote from dwellings.
- 8.5.2 Operations are not permitted during ‘unsociable’ hours (see **paragraph 3.3.1**).
- 8.5.3 The Permit Holder ensures that noise levels are kept under review and site operatives and drivers are instructed to ensure minimum noise generation, particularly when operating mechanical plant or filling empty containers.
- 8.5.4 All site vehicles, processing plant and equipment is serviced and maintained in accordance with manufacturer’s recommendations and, should any complaint of noise be received, this will be investigated and dealt with immediately, and recorded in the **site daily log**.
- 8.5.5 **Monitoring:** The site manager remains alert to general noise levels at the site and, is instructed to respond immediately should any unusually high noise levels be noticed or reported. Corrective action would then be taken at the earliest possible opportunity and the matter recorded in the **site daily log**.

8.6. Control of Pests & Scavengers:

8.6.1 Waste of a nature likely to attract insects, rodents or birds etc, are not permitted at the site. Otherwise, the rapid turnover and processing of materials within the **WRB** normally precludes any significant opportunity for habitats to become established.

8.6.2 **Monitoring:** An annual contract is placed with a local pest control specialist to monitor and control any pest problem as necessary. The site is also checked for any evidence of pest or vermin infestation during the daily site walk around. In the event of any infestation being suspected, immediate action is taken to deal with it including any or all of the following; more intense inspections, in-house bating, trapping or spraying. The outcome of the inspections and any necessary action taken are recorded in the **site daily log**.

8.7. Flooding:

8.7.1 Flooding of the site is highly unlikely since the surrounding land is either at the same level as the site or generally falls away from it. Only part of the site is impermeably surfaced and the hardstanding areas rapidly soak away into the underlying soils following rain. For flooding to occur it would only be under the most extreme weather conditions or a major mains water leak, and which would not only affect the site but all other industries on the estate. It would be a major issue involving many other neighbouring ownerships similarly.

8.7.2 Nevertheless, to further ensure avoidance of such a problem, weekly inspection of the interceptor, associated drainage and drainage pond is undertaken, and should any obstruction be found to its free flowing condition or should emptying and cleaning be required, this will be undertaken within the following two working days. Such inspection, the findings and any action taken will be recorded in the **site daily log**.

8.7.3 In the extremely unlikely circumstance of site flooding occurring, all operations within the affected areas will cease until the matter has been fully resolved. This could involve the advice and support of the appropriate service undertakings – fire brigade, Water Company, local authority and the EA. This would be recorded in the **site daily log**.

8.8. Complaints: In the event of any complaint being made relating to site emissions or local amenity issues, the Permit Holder will react immediately to investigate and deal with its cause, and will record the complaint and action taken in the **site daily log**. The advice of the Agency will be sought should a particular problem persist.

8.9 – Fire is addressed separately in the revised and updated Fire Prevention Plan that forms part of this EMS.

9. GENERAL HOUSEKEEPING

9.1. Site Inspection: As described earlier, the site is subject to daily and weekly walk around by a trained employee to ensure that all of the following infrastructure,

environmental and amenity control provisions and installations remain effective. The findings are routinely recorded in the **site daily log**:

- 9.2.1 Site Surfaces (both Impermeable & Hardstanding):** All are inspected periodically and any defects or deformities noted in the **site daily log**. Depending upon the level and or nature of the necessary repair, efforts are made to return the affected area to sound working condition within three working days. Should there be a risk of polluting liquids penetrating through the impermeable surfaces, all activities above the damaged area will cease until full repair has been achieved. Completion of the repair will be noted in the **site daily log**.
- 9.2.2 Cleansing of Site Surfaces:** All internal roads are kept free of obstructions to ensure the free flow of vehicles, and are swept as necessary to remove any deposits.
- 9.2.3 Drainage System:** The interceptors, associated gullies and drains are inspected weekly for any minor damage or blockages etc, and after heavy rain. They are emptied and cleaned as necessary. In the event of a significant defect being noted every attempt will be made to overcome this immediately.
- 9.2.4 Leaks & Spillages:** Site vehicles and equipment is maintained to a high standard to minimise any risk of lubricant or fuel leaks. Any leakage from these or from any of the wastes delivered to the site will be cleaned up immediately by staff using the site spill kit.
- 9.3. Community Considerations:** It is the Permit Holder’s intention to encourage good relationships with neighbouring organisations and any locally affected individuals. Efforts will be made at all times to minimise disturbance to such neighbours and any complaints dealt with as a priority. All details of such will be entered in the **site daily log**.

10. INFORMATION & RECORD KEEPING

10.1. The Permit details the manner and duration for which site records should be kept and the information to be provided to the EA on a regular basis . The Permit Holder undertakes to meet these requirements at all times.

10.2.In relation to this and as a minimum, the following records will be maintained at the site:

- ◆ The Permit.
- ◆ The Environmental Management System.
- ◆ Accident Records.
- ◆ Copies of Transfer Notes and Consignment Notes.
- ◆ A daily log of the types and quantities of wastes received and dispatched.
- ◆ Quarterly Returns made to the Environment Agency.
- ◆ Agency Inspection Records (CAR forms).
- ◆ **Site Daily log (or other records) containing details of the following site inspections, maintenance and relevant standards:**

-----END-----