



Best Available Techniques and Operating Techniques

**Geminor UK, St Mark Street, Hull: Environmental Permit
Variation Application**

Geminor UK Limited

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SLR Project No.: 416.065261.00001

24 March 2026

Revision: V2

Basis of Report

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1.0 Introduction

Geminor UK Limited (Geminor) has retained SLR Consulting Limited (SLR) to prepare an application to vary the Environmental Permit (EP) (Ref: EPR/GP3303PN) issued under the Environmental Permitting (England and Wales) Regulations (as amended) 2016 for the Materials Recycling Facility (MRF), located on St Mark Street, Hull, HU8 7ED.

This Best Available Techniques and Operating Techniques (BATOT) document sets out best practice for operating the site, based on legislation and best available techniques in the industry.

The BATOT will be reviewed and updated on an annual basis or because of any of the following activities (list not exhaustive):

- The issue of an EP variation by the Environment Agency (EA);
- A change to the operational process;
- A significant incident on site;
- A substantiated complaint; or
- Any changes in legislation or guidance documents applicable to the MRF.

This BATOT document is supplemented by the following documents submitted with this EP variation application:

- Non-Technical Summary (Ref: 416.065261.00001/NTS);
- Environmental Risk Assessment (Ref: 416.065261.00001/ERA);
- Fire Prevention Plan (Ref: 416.065261.00001/FPP); and
- Associated Drawings.

No changes have been made to the following documents for this EP variation:

- Baseline Site Condition Report (Ref: 416.065261.00001/SCR);
- Pest Management Plan and
- Odour Management Plan (Ref: 416.065261.00001/OMP).

Geminor is fully conversant with its environmental responsibilities in relation to the site and is fully committed to ensuring that its relevant facilities are designed, constructed and operated to the highest possible standards.

1.1 Environmental Permit

The site operates under a bespoke EP (EA Ref: EPR/GP3303PN) initially issued to Geminor on 6th June 2020. Several administrative variations have been carried out since, and the EP was most recently varied in November 2023 to update Geminor's registered office address.

The EP allows the site to accept dry mixed municipal waste to produce Refuse Derived Fuel (RDF) for onward transfer. The site also operates as a Waste Transfer Station for household, construction, and industrial waste destined for recovery at other sites.

1.2 Proposed EP Variation

This EP variation seeks to make the following changes to the EP:

- Increase the maximum annual throughput;



- Add an additional activity to reflect the production of RDF for recovery – variation to the current AR3 activity;
- Include additional EWC codes; and
- Increase the site’s maximum waste storage capacity. There is no proposed change to the waste treatment activities as a result of the EP variation.

1.3 Report Structure

This report describes the operating techniques that will be implemented at the facility with the conditions of the EP. The report has been drafted to satisfy the requirements of the Environment Agency (EA) and is divided into the following sections:

- **Section 1** Introduction
- **Section 2** Management
- **Section 3** Accident Management
- **Section 4** Operations
- **Section 5** Emissions and Monitoring
- **Section 6** Information

1.4 Site Setting

The site is situated approximately 1.5km north east of Hull city centre within a predominantly commercial area. The site is bounded by St Mark Street to the south which links to the A1165 to the west. The site is bounded by St Mark Street to the south which links to the A1165 to the west. The National Grid Reference (NGR) for the site is TA 10546 29719.

The immediate surrounding land use is predominantly commercial land. There is a residential area approximately 30m to the south along Redcar Street and the River Hull is located approximately 180m north west of the site.

Access to the site is via St Mark Street. The site’s location is illustrated on Drawing 001 and the EP boundary and Site Layout is illustrated on Drawing 002.

The surrounding land uses and local receptors within 500m are identified on Drawing 003, in addition to the cultural and natural heritage within 1km.

A summary of the site’s immediate surrounding land uses is identified in Table 1-1 below.

Table 1-1 Surrounding Land Uses

Boundary	Description
North	Commercial premises dominate the area, beyond which lies a local cycle path and a railway to the north east.
East	Large areas of commercial premises, with a local cycle path adjacent to the EP boundary, an area of open ground and a small residential area.
South	A small residential area surrounded by commercial premises. Beyond this lies a number of listed buildings, and the A165.
West	Large areas of commercial premises, the River Hull and a number of listed buildings.



2.0 Management

2.1 Management System

Geminor is externally certified to the following standards, registered through NQA:

- ISO 14001 (Environmental Management);
- ISO 9001 (Quality Management); and
- BS 45001 (Occupational Health and Safety Management).

The above standards form part of the site's bespoke EMS which governs operations at the facility. The bespoke EMS is implemented on site to ensure that:

- The risks that the activities pose to the environment are identified;
- The measures that are required to minimise the risks are identified;
- The activities are managed in accordance with the management system;
- Performance against the management system is audited at regular intervals; and
- The EP is complied with.

Consequently, operational procedures for the management of the facility ensures that all appropriate pollution prevention and control techniques are delivered reliably and on an integrated basis.

The EMS assists in maintaining compliance with regulator requirements and managing environmental impacts.

2.1.1 Management Structure and Responsibilities

The Site Manager is responsible for day to day operations and compliance with the EMS and the EP.

Whenever the site is open to receive waste, or carry out any of the management operations, it is supervised by members of staff who are suitably trained and fully conversant with the requirements of the EP regarding:

- Waste acceptance and control procedures;
- Operational controls;
- Maintenance;
- Record-keeping;
- Emergency action plans; and
- Notifications to the EA.

2.2 Technical Competence and Training

The site is managed by sufficient staff, competent to operate the site.

The waste management activities undertaken at the facility are under the overall control of a technically competent person who holds a relevant Certificate of Technical Competence (COTC) under the Waste Management Industry Training and Advisory Board (WAMITAB) scheme.

A fully trained member of staff is on site at all times during waste acceptance hours, in order to provide supervision for waste acceptance. This staff member is fully conversant with the waste acceptance procedure, EP, and contents of the EMS.



An assessment of training needs is carried out to identify the posts for which specific environmental awareness training is needed, and the scope and level of such training. The assessment of training needs is reviewed on an annual basis. All staff employed at the facility benefit from a training programme, which ensures their professional and technical development.

Geminor's EMS and training procedure ensure the following:

- All staff have clearly defined roles and responsibilities;
- Records are maintained of the skills required for each post;
- Records are maintained of the training and relevant qualifications undertaken by staff to meet the requirement of each post; and
- Operations are governed by standard operating instructions.

The training programme ensures that relevant staff are aware of the following:

- Regulatory implications of the EP for the facility and their specific work activity;
- All potential environmental effects from operations under normal and abnormal circumstances;
- The need to report deviations from the EP;
- Prevention of accidental emissions and action to be taken should accidental emissions occur; and
- Records of training needs and training received are maintained.

All members of the management team including those responsible for overseeing site activities receive thorough training with regard to the conditions of the EP and their resultant duties. Management are also conversant with an annually refresh their knowledge of the sites EMS.

2.3 Site Security

The site is enclosed by perimeter fencing and the site entrance gates are designed to prevent unauthorised access.

The gates and fencing are inspected weekly to identify any weaknesses or defects. Any defects identified will be repaired with a temporary solution within 24 hours, with a permanent fix implemented within 7 days, unless a timescale is otherwise agreed with the EA.

The site benefits from CCTV that covers all internal and external areas and is monitored 24/7. All doors to buildings are locked when not in use and the processing building is protected by a monitored alarm system.

2.4 Display of Environmental Permit

A copy of the EP is kept available in the site office for reference by all staff and contractors whose work may have an impact on the environment.

2.5 Managing Documentation and Records

Controls are in place to ensure that all documents are issued, revised and maintained in a consistent fashion.

The documents that are included within the scope of the controls are as follows:

- Policies;



- Responsibilities;
- Maintenance records;
- Procedures;
- Results of audits;
- Results of reviews;
- Complaints and incident records; and
- Training records.

Records are made and kept up to date on a daily basis to reflect deliveries, on-site treatment and dispatches.

All records relating to waste acceptance are maintained and kept readily available on site and kept for a minimum of two years after the waste has been removed off site.

2.6 Permit Surrender

A Site Condition Report (SCR) (Ref: 419.08678.00001/SCR) was prepared and submitted to the EA in support of the EP application in June 2020.

This document sets out the condition of the site at the time the EP application was submitted. The SCR has been updated (but not submitted as it is not required for this type of variation) , to reflect the site's updated activities, and will continue to be updated during the operational life of the site as appropriate.

To assist in permit surrender, records will continue to be maintained to demonstrate how the land beneath the site has always been protected between the date of EP issue and the end of operations.

Records to be maintained include:

- Maintenance of surfacing;
- Maintenance of drainage system; and
- Actions taken to clean up incidents and spillages.

2.7 Reporting Non-Compliance and Taking Corrective Action

Non-compliances detected on site will be reported, investigated, and rectified. Staff will maintain awareness of non-compliances in the following areas:

- Actual or potential non-compliance;
- System failure discovered at internal audit;
- Suppliers or subcontractors breaking the agreed operating rules;
- Incidents, accidents and emergencies;
- Other operational system failure; and
- Complaints.

The action taken in response to the non-conformance may include:

- Obtaining additional information on the nature and extent of the non-conformance;
- Discussing and testing alternative solutions;



- Modifying procedures and responsibilities;
- Seeking approval for additional resources and training; and
- Contacting suppliers and contractors.

2.8 Complaints

The complaints procedure and record form are included as Appendix A. The complaints procedure records any complaints Geminor receive in relation to activities covered by the EP, how the complaints are investigated, and any actions taken as a result of complaints.

2.9 Auditing and Legal Compliance

There is a formalised internal auditing procedure to ensure the facility is audited at defined intervals and that the progress of corrective and preventative action is monitored. The site's monthly and quarterly audit procedures are included as Appendix B.

2.10 Monitoring, Measuring, and Reviewing Environmental Performance

Environmental performance is reviewed regularly in accordance with the EMS, and any necessary actions will be taken.

2.11 Operational Control, Preventative Maintenance and Calibration

This document will complement operational procedures to ensure effective control of operations, the use of approved suppliers and contract services, the maintenance of operational equipment and the calibration of monitoring equipment.

Geminor acknowledges that poor maintenance can be the cause of environmental incidents. As the potential of failure of plant could lead to fugitive emissions to the environment, Geminor carry out a programme of Planned Preventative Maintenance (PPM). All items of plant and equipment are regularly inspected and maintained in accordance with the manufacturer's specifications.

Geminor's maintenance procedure, associated checklists, and plant and equipment manuals are included as Appendix C.

2.12 Design and Construction Quality Assurance

All relevant elements of the facility have been designed in accordance with recognised standards, methodologies and practices.

The design process used a risk-based approach and is appropriately documented using drawings, specifications and method statements to provide an adequate audit trail.

Construction Quality Assurance (CQA) plans will govern the construction of any key environmental control infrastructure relating largely to changes to the drainage infrastructure or impermeable pavements. These CQA plans will be prepared by competent and suitably qualified persons and will detail the assurance and validation process.

A competent and suitably qualified person will supervise the construction activities and prepare a validation report confirming that the key construction activities have been carried out in accordance with the CQA plan.



3.0 Accident Management Plan

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

An accident management plan is implemented and maintained at the facility to ensure that the site and staff are fully prepared for any 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 occurrence.

The Site Manager is responsible for implementing the accident management plan and investigating and responding any incidents. A record of any accidents, investigations and the response will be maintained by the Site Manager in the Site Diary.

The following accident management plan describes the techniques that are implemented on Site to minimise the risks posed to the environment. Activities affecting the health and safety (H&S) of operatives, contractors and visitors are managed separately in compliance with H&S regulation and company H&S Policy.

3.1 Accident Management Plan Document Control

Any changes to the Accident Management Plan will be labelled in chronological order and the date of the change recorded. All records of the changes will be listed in the revision history in Table 3-1 below.

Table 3-1 Revision History

Version	Reason for Revision	Date of Revision	Signature of Site Manager
1.0	First Version of Accident Management Plan Finalised and Released		
2.0	Accident Management Plan updated to reflect EP Variation application		



3.2 Hazard Identification and Contingency Plan

The following potential hazards have been identified:

- The acceptance of unauthorised waste;
- Fire;
- Loss of Containment – spillage and leakage;
- Process equipment failure;
- Security and vandalism;
- Flooding; and
- Enforced shutdowns.

The following sections summarise the measures necessary to minimise the potential causes and consequences of accidents.

Hazard	Pathway	Risk management	Likelihood of Accident	Consequence	What is the overall risk
What has the potential to cause harm?	How can the hazard get to the receptor?	What measures will you take to avoid the accident happening and what measures will you take to minimise the impact if the accident does happen? – Who is responsible for what?	How likely is this accident to occur?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence
Unauthorised waste	Via air (odours) Overland (to sewers, surface and groundwater)	The site benefits from waste pre-acceptance procedures and a site-specific Waste Acceptance Procedure (WAP). Upon delivery, all waste is subject to strict visual inspection by Site Operatives and checking against the agreed WAP and declaration on the waste transfer note to identify, reject, and/or segregate potentially non-conforming waste. Only waste authorised by the EP is accepted at the site.	Low	Water contamination	Not significant



Hazard	Pathway	Risk management	Likelihood of Accident	Consequence	What is the overall risk
		<p>In the event that unauthorised waste is delivered to the Site, the waste will be segregated and stored in the designated quarantine/isolation area illustrated on Drawing 002 prior to export from the site.</p> <p>The Site Manager is responsible for implementing risk management measures.</p>			
Fire	Air, water runoff	<p>The site operates and follows the management techniques detailed in the approved Fire Prevention Plan (FPP).</p> <p>The FPP follows the EA guidance for FPPs¹ and details the required mitigation and management methods to prevent a fire of combustible materials stored on Site. The information contained within the FPP aims to meet the 3 main objectives of the EA's FPP Guidance:</p> <ul style="list-style-type: none"> • Minimise the likelihood of a fire happening; • Aim for a fire to be extinguished within 4 hours; and • Minimise the spread of fire within the site and to neighbouring sites. <p>It is noted that the increase in size of the waste stockpiles within the site's existing reception waste storage bay, and outgoing/processed waste storage bay will result in dimensions outside of the scope of the EA's FPP Guidance.</p>	Low	<p>Nuisance (smoke and fumes) and harm to human health.</p> <p>Water contamination (runoff)</p>	Not significant

¹ Fire Prevention Plans: Environmental Permits, May 2018.



Hazard	Pathway	Risk management	Likelihood of Accident	Consequence	What is the overall risk
		<p>Alternative measures have been proposed within the updated FPP to ensure that the site will continue to meet the three objectives of the EA's FPP Guidance.</p> <p>In summary, to prevent and minimise the potential impact of fire, the following action will be taken:</p> <ul style="list-style-type: none"> • A first in, first out principle is applied to prevent the build-up of heat in the waste; • Plant and equipment are maintained and operated in accordance with the manufacturer's instructions. Inspection of plant and equipment is undertaken on a daily basis to check for faults and ensure appropriate safeguards are in place; • Burning is not permitted on site and any fire will be treated as an emergency; • The site benefits from an automatic detection system supplied, installed, tested and commissioned by Helios Systems Ltd; • The site benefits from an automatic suppression system supplied, installed, tested and commissioned by Helios Systems Ltd. Foam, water, carbon dioxide, and powder extinguishers are provided on site; • Smoking is not permitted in the waste storage areas of the site, and a designated area is provided a minimum of 6m from any combustible waste; and • Working practices ensure the assessment of fire hazards and training of employees in fire prevention, e.g. the use of fire 			



Hazard	Pathway	Risk management	Likelihood of Accident	Consequence	What is the overall risk
		<p>extinguishers and emergency procedures.</p> <p>In the event of a fire, the following action will be taken:</p> <ul style="list-style-type: none"> • The Site Manager, Fire Service, EA and neighbouring land users will be notified; • The management of fire on site will be determined by size/severity and in accordance with the FPP; • Site staff will only attempt to extinguish a fire if considered safe to do so; and • The site / buildings will be evacuated. <p>The Site Manager is responsible for implementing risk management measures.</p>			
<p>Loss of Containment - Spillage and Leakage</p>	<p>Runoff and percolation through ground</p>	<p>Loss of containment could lead to spillage and leakage of potentially contaminating liquids. Table 5-1 of this BATOT includes the location and storage arrangement of all potentially contaminating liquids on site.</p> <p>To prevent loss of containment and minimise the risk and impact of releases the following measures are implemented:</p> <p>Storage vessels: Storage tanks are constructed to the appropriate British Standard;</p> <p>Inspection: Tanks are inspected visually on a regular basis by the Site staff to ensure the continued integrity of the tanks, and identify the requirement for any remedial action;</p>	<p>Low</p>	<p>Contamination of groundwater and surface water</p>	<p>Not significant</p>



Hazard	Pathway	Risk management	Likelihood of Accident	Consequence	What is the overall risk
		<p>Spill kits: Materials suitable for absorbing and containing minor spillages are maintained on Site; and</p> <p>Monitoring techniques: Site staff undertake regular monitoring for evidence of spillage and leakage.</p> <p>In the event of any potentially polluting leak or spillage occurring on Site, the following action will be taken:</p> <p>Minor spillages will be cleaned up immediately, using sand or proprietary absorbent. The resultant materials will be placed into containers and will then be removed from Site and disposed of at a suitably permitted facility. The incident will be logged in the Site Diary.</p> <p>Any dry wastes spilled on Site will be collected and transported to the appropriate area of the Site.</p> <p>In the event of a major spillage, which is causing or is likely to cause polluting emissions to the environment, immediate action will be taken to contain the spillage and prevent liquid from entering surface water or drains. The spillage will be cleared immediately and placed in containers for offsite disposal, and the EA will be informed.</p> <p>The Site Manager is responsible for implementing risk management measures.</p>			



Hazard	Pathway	Risk management	Likelihood of Accident	Consequence	What is the overall risk
Security and Vandalism	Land and air	<p>The following security measures are in place to limit the likelihood of a security breach or vandalism including:</p> <ul style="list-style-type: none"> • Perimeter fencing with a gated entrance which is locked if appropriate; • Lockable doors on the processing building and office/welfare facilities; • Full 24/7 CCTV coverage of all internal and external areas; • Monitored alarm system for the waste processing building; • Inspection and maintenance procedures; and • A visitor sign in system. <p>All mobile plant is stored in the dedicated mobile plant storage areas (illustrated on Drawing 002) which is covered by the monitored CCTV system.</p> <p>In the event of a breach of security at the Site, the cause will be investigated, and appropriate mitigation measures implemented. This will be recorded in the Daily Site Log. Records to be maintained include inspections and maintenance of security fencing and gates, breaches of security, investigations and actions taken.</p>	Low	<p>Nuisance and harm to human health.</p> <p>Contamination of land and surface water.</p>	Not significant
Flooding	Overland	<p>There are no surface water features within the Site boundary.</p> <p>The site lies within a flood zone 3, and benefits from flood defences to significantly reduce the possibility of flooding.</p>	Low	Inundation of site with flood water	Not significant



Hazard	Pathway	Risk management	Likelihood of Accident	Consequence	What is the overall risk
		<p>In the event that an accident occurs, or additional risks are identified, the Site manager is responsible for carrying out an investigation to determine the cause and implementing remedial action prior to logging this in the Site Diary.</p> <p>The Site Manager is responsible for implementing risk management measures.</p>			
Breakdowns – including mobile and fixed plant and machinery.	Land, surface water and groundwater	<p>Geminor operate a PPM programme for all plant and machinery on site, to prevent the breakdown of machinery and plant on site.</p> <p>In the event that plant and mobile plant breakdowns on site, the Site Manager will decide whether the acceptance of waste will need to cease and be diverted to another facility located nearby, to prevent the build-up of waste in the building. The relevant maintenance company will be called and asked to attend site as soon as possible.</p> <p>In the unlikely event that the site will exceed their storage limit during the period of downtime, waste will be diverted to a suitably licensed facility to ensure the Site does not reach over capacity.</p> <p>The Site Manager is responsible for implementing risk management measures.</p>	Low	Contamination of land, local surface and groundwater	Not significant – due to management measures implemented on site for PPM, as detailed in this EMS.
Enforced shutdowns	Land, surface water and groundwater	<p>If the site experiences a period of an enforced shutdown, waste will not be accepted on site and will be diverted to appropriate licensed facilities in the area.</p>	Low – unlikely for the site to experience enforced shutdown	Contamination of land, surface water and groundwater	Not significant



Hazard	Pathway	Risk management	Likelihood of Accident	Consequence	What is the overall risk
		<p>All waste already stored on site, will be checked on a daily basis to ensure that there is no risk for the potential pollution of the environment. Any processed waste, if possible, will be removed/transferred off site.</p> <p>The Site Manager is responsible for implementing risk management measures.</p>			



4.0 Operations

4.1 Overview of Waste Operations

The site accepts up to 250,000 tpa of non-hazardous waste.

Activities on site comprise the storage and physical treatment of waste by sorting, separation, screening, shredding and baling (and wrapping) for further recovery or disposal. All waste treatment operations take place within a building.

The facility primarily accepts dry mixed municipal waste (non-hazardous) to produce RDF for onward transfer for recovery primarily (the EP also allows for the production of RDF destined for disposal). The site also operates as a Waste Transfer Station for household, construction and industrial waste destined for recovery at other sites.

4.2 Process Description

4.2.1 External Yard

Vehicles (Refuse Collection Vehicles (RCVs)) or articulated bulk haulage vehicles enter the facility off St Mark Road and report to the weighbridge office. The waste is weighed, and the driver confirms the type of waste being delivered. An operator visually inspects the vehicle load to confirm it matches the description and for any contaminants. All appropriate paperwork is checked at the weighbridge prior to the vehicle being directed to the appropriate entrance to the waste processing building.

The roller fast acting door are opened and closed once the vehicle has entered the building.

RDF Bales will be removed from site on stand trailers which are loaded within the building. Drawing 02 illustrates the possible temporary holding areas for the loaded trailers used in the transfer operation. The number of trailers on site is transient across any 24 hour period therefore a permanent location for the transfer operation has not been included.

No waste treatment activities take place within the external yard.

4.2.2 Waste Processing Building

Once inside the waste processing building an operator visually inspects the vehicle load for any contaminants before allowing the vehicle to discharge their load into the large reception waste storage bay located along the western side of the building.

Waste is transferred via a hopper to the processing plant, which undertakes the following treatment processes;

- Sorting;
- Shredding;
- Separating;
- Screening; and
- Baling.

Treated waste is transferred by conveyors to the outgoing/processed waste storage bay along the eastern side of the building, as illustrated on Drawing 002. RDF bales, are transferred to stand trailers within the building and temporarily held in the yard area as described in Section 4.1.1.1 above, or within the designated bale storage area within the waste processing building.



All waste treatment activities on site are undertaken within the waste processing building.

4.2.3 Acceptance of Astro Turf

Geminor propose to accept up to 50,000 tpa of waste Astro Turf from UK sports pitches on a campaign basis under EWC code 17 09 04.

- Astro Turf will be accepted, wrapped and removed from site for further processing and **recovery** only. There will be no treatment of waste Astro Turf on site.
- Astro Turf will be accepted on a **campaign basis** and will arrive suitably sized so that no further treatment would be required prior to wrapping.
- When astro turf is accepted at the facility, RDF processing will temporarily cease and the Astro Turf will be transferred off incoming vehicles in the waste reception building, where it will be baled and wrapped immediately.
- Site Management will ensure that the Astro Turf will be kept separate from existing operations.
- The baled and wrapped Astro Turf will be transferred to the stand trailers (the locations of which are illustrated on Drawing 002) which are located externally for a maximum of 24 hours prior to transfer off site (48 hours for contingency i.e. if a load is not transported off site on the day of loading).

4.3 Permitted Activities

The activities comprise the storage and physical treatment of waste by sorting, separation, screening, shredding and baling (and wrapping) for further recovery or disposal. The permitted activities for the site are listed in Table S1.1 of the EP, and are summarised below.

4.3.1 Listed Activity

The activities at the MRF fall under a Listed Activity as detailed in Schedule 1 of the EP Regulations:

- Section 5.4, Part A (1) (a) (ii) – disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day (or 100 tonnes per day) if the only waste treatment activity is anaerobic digestion) involving physico-chemical treatment and pre-treatment of waste for incineration or co-incineration.

The following Directly Associated Activity (DAA), applies:

- Storage of non-hazardous waste prior to treatment.

The listed activity as defined under Annex II of the Waste Framework Directive can be summarised as follows:

- **D9:** Physico/physico-chemical treatment of waste prior to any other disposal operation;
- **D14:** Repackaging prior to submission to any of the operations numbered D1 to D12;
- **D15:** Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where the waste is produced).

4.3.2 Waste Operation

The facility also requires a waste operation for the treatment of waste on site destined for recovery. Activities will include those detailed in Section 4.2.1 above and will include the following specified waste management activities:



- **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; and
- **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).

4.4 Waste Tonnage and Types

The site will accept up to 250,000tpa of waste.

The site can store up to 1,750 tonnes of waste at anyone time.

The waste list is detailed in Table 4-1 below. Those highlighted in green have been included in the 2024/2025 variation application.

Table 4-1 Waste List

EWC Code	Description
15	WASTE PACKAGING, ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01	Packaging (including separately collected municipal packaging waste)
15 01 02	Plastic packaging
15 01 06	Mixed packaging
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
17 09	Concrete, bricks, tiles and ceramics
17 09 04	Mixed construction and demolition wastes other than those mentioned in 17 09 01 17 09 02, and 17 09 03 (ASTRO TURF)
19	WASTES FROM WASTE TREATMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE WATER INDUSTRY
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 04	Plastic and rubber
19 12 07	Wood other than that mentioned in 19 12 06
19 12 10	Combustible waste (refuse derived fuel)
19 12 12	Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11
20	MUNICIPAL WASTES AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	Separately collected fractions
20 01 01	Paper and cardboard
20 01 02	Glass



EWC Code	Description
20 01 38	Wood other than that mentioned in 20 01 37
20 01 39	Plastics
20 01 40	Metals
20 02	Garden and park wastes (including cemetery waste)
20 02 01	Biodegradable waste
20 02 02	Soil and stones
20 02 03	Other non-biodegradable wastes
20 03	Other municipal wastes
20 03 01	Mixed municipal waste
20 03 03	Street-cleaning residues
20 03 07	Bulky waste

4.5 Waste Storage Arrangements/Plan

Waste storage on site takes place inside the waste processing building on impermeable concrete surfacing, within the following areas:

1. Reception waste storage bay (W13m x L31.275m x H4m);
2. Outgoing/processed waste storage bay (W13m x L6.5m x H4m);
3. Metal skip (W3.66m x L1.83m x H1.37m); and
4. Bale storage area (W9m x L9m x H4m).

When waste astro turf is received, RDF processing will temporarily pause and the astro turf will be set down next to the processing equipment and wrapped immediately using the existing RDF baler, as illustrated on Drawing 02. In this way, Site Management will ensure that astro turf is kept separate from existing operations. Once wrapped, the waste will be stored in a stand trailer (illustrated on Drawing 02) external to the waste processing building for a maximum of 24-48 hours prior to export from site. Waste astro turf is not considered to be combustible however is described below for context.

Each of the storage areas on site are discussed further below and should be read in conjunction with Drawing 02.

4.5.1 Reception Waste Storage Bay

For operational reasons within the larger reception waste storage bay, loose waste is stored within freeform stockpiles which exceed the maximum pile size detailed in the EA FPP Guidance.

To justify this deviation from the guidance, the robust fire detection, prevention and suppression measures in place at the site are supplemented with additional management techniques to ensure that the three FPP objectives continue to be met. The alternative measures are further detailed within Section 2.4.5.

Each stockpile will have a maximum height of 4m. The Site Manager is responsible for ensuring that stockpiles are in accordance with Table 2-1. A yellow line is painted at a 4m height around the inside of the bay walls to ensure that the maximum height is not exceeded.



4.5.2 Metal Skip

The shredder benefits from an over-band magnet, to separate metal from the RDF material. Separated metal is stored in a small skip, next to the shredder, within the waste processing building as illustrated on Drawing 02. The skip is removed and replaced, by a third party, within a maximum of 30 days, for further processing at an alternative suitably permitted facility. A maximum of 8 tonnes (6.1m³) of waste will be stored in the skip at any one time.

4.5.3 Bale Storage

As illustrated on Drawing 02 an area at the south of the waste processing building is designated for RDF bale storage. Bales will be stored for a maximum of 7 days.

Stand trailers temporarily holding RDF bales as part of the transfer off site are situated on impermeable surfacing external to the waste processing building. The number of trailers on site is transient across any 24 hour period therefore a permanent location for the transfer operation has not been included. A maximum of ten will be used at any one time. The stand trailers will typically be removed from site within 24-48 hours.

Bale storage arrangements are described further in Table 2-1 below.

4.5.4 Waste Storage Area Summary

Waste storage areas on site are summarised below in Table 2-1, and are illustrated on Drawing 02. Waste storage areas highlighted in grey are not considered to be combustibile in accordance with EA FPP Guidance, but are included in Table 2-1 for completeness.

Table 4-2 Mixed Municipal Waste: Waste Types, Storage Time and Dimensions

Waste Storage Area	Waste Type	Max Storage Time (Days)	Storage Arrangement	Max Length (m)	Max Width (m)	Max Height (m)	Max Volume (m ³)
Reception Waste Storage Bay (inside waste processing building)	Incoming loose RDF and all other waste types if and when storage required	3	Un-processed loose stockpile	31.275	13	5 ²	1626.3 ³

² The height of the bay storage walls is 5m, however a freeboard of a minimum of 1m will be maintained at all times, so waste will only be stored to a maximum height of 4m.

³ It is noted that the dimensions of the large reception waste storage bay is outside of the scope of the EA's FPP Guidance. Alternative measures have been proposed within Section 2.4.5 to ensure that the site will continue to meet the three objectives of the EA's FPP Guidance.



Waste Storage Area	Waste Type	Max Storage Time (Days)	Storage Arrangement	Max Length (m)	Max Width (m)	Max Height (m)	Max Volume (m ³)
Outgoing/Processed Waste Storage Bay (inside waste processing building)	Processed loose waste, and all other waste types if and when storage required	3	Processed loose stockpile	6.5	13	5 ³	422.5
8 Yard Metal Skip (inside waste processing building)	Metal separated from RDF material	30	8 Yard Skip	3.66	1.83	1.37	6.1
RDF Bale Storage (inside waste processing building)	RDF Bales	7	Bales	9	9	4	324
External Stand Trailer Transfer Operation	RDF/Astro Turf Bales	1-2 (usually removed from site on a daily basis and replaced with an empty container)	Bales	13.6	2.4	2.7	89

4.6 Fire Prevention Plan

The site is permitted to store combustible waste and therefore operates in accordance with the agreed FPP. A copy of the FPP is available in the Site Office.

The FPP is written in accordance with the EA's Guidance⁴ and explains how Geminor prevent a fire at the site and how they would manage risks from a fire if one were to occur.

The FPP details the alternative measures that will be implemented on site to account for the stockpile sizes outside of the EA's FPP Guidance to ensure that the three objectives continue to be met.

4.7 Waste Acceptance

The WAP which is followed on site is included as Appendix D. This ensures that the site only accepts waste types which are permitted by the EP.

⁴ [Fire prevention plans: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk)



4.7.1 Hours of Operation

The site is manned with site operatives present on site between 7am and 3am Monday to Friday and between 7am and 1pm on Saturdays.

4.7.2 Load Inspection and Waste Control

All vehicles bringing waste material to the site report to the weighbridge where the load is visually inspected, where possible, to confirm its description and composition against the relevant accompanying documentation. All wastes undergo a further visual inspection during deposition.

Waste will only be accepted at the site if the description in the accompanying documentation is in accordance with the EP and that onsite inspection confirms the waste is consistent with the description provided.

All wastes undergo a further visual inspection during deposition within the reception waste storage bay.

Should the wastes be found not to conform during the visual inspection, then the details will be recorded, and the vehicle turned away. If wastes have already been discharged and are deemed not to conform or otherwise not be permitted, then the waste will be:

- Reloaded on to the delivery vehicle; or
- Removed to a designated quarantine area as appropriate.

Records of non-compliant waste received at the Site will include details on:

- The quantity;
- Characteristics;
- Origin;
- Delivery date and time; and
- The identity of the producer and carrier.

Waste is not accepted unless the site is adequately resourced to receive the waste.

A record will be kept in the site diary of all rejected wastes. In the event of non-conformance, the waste producer and the EA will be notified.

4.7.3 Means of Measurement

The quantity of waste accepted and despatched from the facility will be measured via the weighbridge.

Weighbridge operators record the following within Geminor's electronic waste tracking system Gemisoft:

- Date the waste arrives on site;
- Date the waste was first produced, if it is likely to cause odour;
- List of Waste (LoW) code;
- Vehicle registration number;
- Name of haulage company;
- Name of driver;
- Waste Carrier's registration number;



- Waste producer (waste origin);
- Description;
- Weight; and
- Waste collection point.

Wastes are characterised, as required under the Duty of Care requirements, prior to acceptance of the delivery. On inspection, deliveries which do not have the required information, will either have to produce the correct information, or will be refused entry to the Site. All deliveries and removals from the site are recorded in Geminor's electronic waste tracking system Gemisoft and records will be kept accessible for inspection by management and the EA.

4.8 Site Infrastructure and Equipment

4.8.1 Site Identification Board

A site identification board which is easily readable from outside the entrance during hours of daylight is provided at the main site entrance.

The identification board is inspected at least once per week. In the event of damage or defect that significantly affects the legibility of the board it will be repaired or replaced within a timescale agreed upon with the EA. Any defects and repairs will be recorded in the site diary.

The board displays the following information:

- Site name and address;
- Permit holder;
- Permit number;
- Emergency contact name and telephone number;
- EA national telephone number (03708 506506) and the EA incident hotline (0800 807060); and
- Days and hours the site is open to receive waste.

4.8.2 Plant and Equipment

The following items of fixed and mobile plant are held on site:

- 1 x Tyron Shredder;
- 2 x Teletrucks
- 1 x Cherry Picker;
- 2 x Senebogans;
- 1 x Loading Shovel;
- 1 x Tug;
- 1 x Wrapper;
- 1 x Bailer;
- 1 x Telehandler.

The above is not a fixed plant list.



All items of plant and equipment on site are maintained in accordance with the manufacturer's recommendations.

In addition, whilst Geminor currently operate using a round bailer, for commercial reasons this is to be changed to a square bailer in the near future. The use of a square bailer does not result in any change to operations, or waste activities at the site, and the site layout including the waste processing area is illustrated on Drawing 002.

4.8.3 Plant Maintenance

Maintenance audits and monitoring are carried out in accordance with the manufacturer's specifications which are kept in the site office or available online.

The machinery is maintained in line with Geminor's maintenance procedure and checklists which are included as part of the site's EMS. Plant and equipment manuals are also held within the EMS.

All plant and equipment receives annual Lifting Operations and Lifting Equipment Regulations (LOLER) and Provision and Use of Work Equipment Regulations (PUWER) inspections. Daily checks are carried out on all mobile plant and any findings are recorded in the Site Diary. All mobile and fixed plant servicing and maintenance is carried out as per the manufacturer's instructions. Any defects will be entered into the incident management system.

A Maintenance Checklist allows all site operatives to actively take part in the site maintenance schedule.

The checklist is completed and maintained by the Site Manager with the following information compiled:

- The item that requires maintenance;
- How often maintenance needs to be carried out (daily, weekly, monthly or yearly);
- A record of any particular maintenance instructions;
- Who on site is responsible for each maintenance check;
- Date maintenance completed and who carried out by; and
- Any particular comments.

The checklist ensures that all Site Operatives are aware of their particular responsibilities for maintenance checking. The Site Manager ensures that all Site Operatives are aware of any amendments and additions to the checklist.

The record forms are kept in the site office to ensure that all Site Operatives can access the records.

In the event that plant replacement is required, Geminor will choose new plant with the lowest emission standard available at the time of purchase.

The following control measures will be in place to reduce emissions as much as possible during operations:

- Use of low sulphur fuel;
- Mobile plant to be switched off when not in use to avoid idling; and
- Planned, preventative maintenance schedule to be rigidly followed to avoid the operation of poor performing or inefficient plant.



5.0 Emissions, Management and Monitoring

The site is operated so that there are no point source emissions to air, surface water, groundwater or land.

The Daily Site Monitoring Checklist and Procedure is included as Appendix E.

5.1 Surface Water and Groundwater

The site is operated to prevent fugitive emissions to surface water and groundwater.

All waste storage and treatment activities will continue to take place on impermeable surfacing with a sealed drainage system within the main building.

5.1.1 Waste Processing Building

The building benefits from impermeable surfacing throughout and requires no engineered drainage system, due to the inherently dry treatment process and type of waste accepted. Any clean down water runoff is contained within the building.

Any water released from the water cannons via the fire suppression Helios System or through firefighting would be contained within the waste processing building.

5.1.2 External Yard Area

The yard area benefits from a mixture of permeable and impermeable surfacing (as illustrated on Drawing 002), enclosed by kerbing on the boundary where impermeable surfacing meets permeable surfacing.

Bales will be removed from site on stand trailers which are loaded within the building. Drawing 02 illustrates the possible temporary holding areas for the loaded trailers used in the transfer operation. The number of trailers on site is transient across any 24 hour period therefore a permanent location for the transfer operation has not been included. Bales are double wrapped and sealed in plastic wrapping.

All runoff collected within this area drains to a central point in the yard, where via underground pipework, runoff will flow to an interceptor, before transferring to a surface water flow control box (to regulate the release of surface water to sewer). A penstock isolation valve is installed at the release point to sewer, which will be closed by site operatives if required (i.e. during a fire event).

5.1.3 Containment Bunding

Chemicals or fuel used on site are stored in an appropriate tank that benefits from a bund with the capacity to store 110% of the tank capacity. Bunds are:

- Impermeable and resistant to the stored materials;
- Have no outlet;
- Designed to catch leaks from tanks or fittings;
- Have a capacity greater than 110% of the largest tank or 25% of the total tankage (whichever is greater);
- Have pipework routed within bunded areas with no penetration of contained surface;
- Have tanker connection points within the bund; and
- Subject to regular visual inspection.



5.2 Sewer

The site discharges foul water to sewer. A penstock isolation valve is installed at the release point to sewer, which will be closed by site operatives in the event of a fire or spillage ensuring no escape of firewater/pollution from the site.

5.3 Odour

The OMP Details how the site is operated in accordance with the EA's H4 guidance. The OMP should be read in conjunction with this document, however elements of the plan have been summarised below.

5.3.1 Mitigation and Management Measures

A summary of the mitigation and management methods to prevent the release of fugitive emissions of odour is as follows;

- The strict WAP are adhered to, to ensure only permitted wastes are accepted on site;
- All waste treatment activities take place within the main reception building, which uses a combination of fast acting doors and process air ventilation to prevent the fugitive release of odorous air;
- The air within the building is managed through extraction into the odour abatement system prior to release;
- During the working day, the fast action roller shutter doors open and close to facilitate the entry/exit of waste collection vehicles. In this way, negative pressure is maintained within the building and odours treated prior to emission release;
- The air within the building is managed through extraction via a dedicated odour abatement and extraction system which maintains negative pressure within the building. Internal air from within the reception hall is ducted externally to a carbon bed filter system located on the eastern façade of the building. The odour abatement system comprises a filter system to draw air and any odours into the building when the doors are opened to accept delivery / export vehicles. The system is designed to achieve 3 air changes per hour (acph). Odour is discharged post abatement with a performance guarantee of $600 \text{ou}_E/\text{m}^3$;
- Once received and processed, any waste material stored on site within the processing building does not exceed a maximum 72 hours;
- Stand trailers (for transfer of bales offsite) will typically be removed from site on a daily basis and replaced;
- Stand trailers are sealed by closing curtains and doors, at all times, unless waste is being loaded/unloaded;
- Bays are cleaned down regularly to avoid older materials building up and degrading and potentially releasing odours; and
- All vehicles exiting the facility are closed or covered.

Further mitigation and management measures are detailed within the OMP.

5.4 Dust

The risk of airborne emissions of dust is extremely low due to the type of waste to be accepted and the inherent physical properties of the waste.



Dust is further minimised through the following measures:

- All treatment of waste occurs within the main processing building;
- The building benefits from roller shutter doors, which are kept closed and only opened for deliveries of waste or transfer of treated waste off site;
- Speed limits are implemented on site for all vehicles to minimise the mobilisation of particulates;
- Site access roads and operational areas are maintained and swept regularly to reduce dust generation;
- Dusty waste types are stored within the building or in containers/skips;
- Transfer of dusty materials to containers/skips is undertaken within the confines of a building; and
- Daily visual inspection of the site and site boundary is carried out by site personnel.

5.5 Noise

A Noise Risk Assessment was prepared in support of the original planning permission. The assessment concluded that operational noise from the site would have a 'low' risk of adverse impact on residential receptors. It was also highlighted, that due to the location of the site being in close proximity to several other industrial and commercial sites (which contribute significantly to the existing noise environment) it was concluded that the operations at the facility would not be significantly difference to the current soundscape. In context of other standards (BS 8233:2014 and WHO guidelines) which apply to residential properties, predicted noise levels would not exceed these targets either.

The proposed increase to the maximum annual throughput and the maximum waste storage capacity is not considered likely to increase the generation of noise from the site as there is no change proposed to the existing permitted activities.

5.5.1 Mitigation and Management Methods

A summary of the mitigation and management methods to prevent the release of fugitive emissions of noise is as follows;

- Site operations are restricted to hours specified in the planning consent as detailed in Section 4.6.1 above;
- Speed limits are implemented for vehicles using the site. Traffic calming measures are implemented to enforce speed limits;
- The waste processing building benefits from roller shutting doors, which are kept closed at all times unless a delivery is taking place;
- All waste is treated within the waste processing building;
- Waste is deposited in the waste processing building;
- Site access & haul roads and operational areas are maintained and repaired to minimise emissions of noise due to uneven and poor surfacing;
- If horns or alarms are deemed to cause unacceptably high levels of noise, alternative technologies will be explored and implemented;
- Plant is selected & operated to minimise noise. Plant is fitted with noise silencers where possible;



- All site plant and machinery are operated and maintained in accordance with manufacturer's specifications; and
- Auditory inspections are carried out daily & in response to complaints.

If a complaint is received, it will be logged in the Site Diary. The Site Manager is responsible for investigating the complaint and taking action to identify the source of the noise and implement remedial measures where appropriate.

5.6 Pests

Due to the type of waste accepted on site, it is possible that pest infestations might occur. To prevent potential pest infestations from the acceptance, treatment and storage of waste, the site operates in accordance with the Pest Management Plan (PMP) (Ref: 416.08678.00001/PMP).

The PMP should be read in conjunction with this document, however the following management and mitigation measures are implemented on site, to prevent infestations from occurring;

- The WAP ensures that only authorised wastes are accepted onto site;
- All waste is treated within the waste processing building, which benefits from roller action doors which are kept closed at all times, except for incoming deliveries and outgoing transfers;
- Wastes will likely be treated on the day arrival, or within 72 hours, limiting the time for the development of infestations;
- RDF bales are double wrapped, and sealed in plastic wrapping prior to storage within the waste processing building, or with external stand trailers;
- A specialist contractor is employed to provide preventative measures across the site (including rat boxes); and
- The site is inspected daily for signs of pest infestations.

If an infestation becomes an issue, or complaints are received, an investigation to establish the cause will be undertaken and action taken accordingly, e.g. if the problem is caused by a particular waste type, cease accepting that waste until a suitable method statement detailing how the waste is handled, has been prepared and implemented. The Site Manager is responsible for implementing risk management measures in conjunction with the EMS document.

5.7 Litter

The waste types accepted and treated on site could potentially lead to litter escaping the waste processing building. Therefore, the following management and mitigation measures are implemented on site;

- The WAP ensures that only authorised wastes are accepted and all wastes with the potential to generate litter are accepted, and treated within the confines of waste processing building which benefits from roller shutting doors, the layout of which is illustrated on Drawing 002;
- RDF Baled wastes are double wrapped, and sealed in plastic wrapping prior to storage within the waste processing building, or within the external stand trailers. The stand trailers are sealed by closing curtains and doors, at all times unless waste is being loaded/unloaded;
- Vehicles are sheeted or enclosed when arriving and departing the site;



- Bins are provided on site around welfare areas for the use of site visitors and personnel;
- All yard areas and the waste processing building are swept clean every day and any spilt waste deliveries will be removed;
- The site and its immediate surrounding are inspected daily and action is taken to maintain the area free of significant accumulations of litter and debris; and
- Any excessive litter material at the facility or on the highways is cleared using a mechanical sweeper and/or litter picker if required.

The Site Manager is responsible for implementing risk management measures in conjunction with the EMS document.

5.8 Mud and Debris

The access road for the facility is along St Mark Road. Due to the nature of the waste accepted on site, mud and debris do not pose a serious risk. Within the site the following measures will continue to be taken to prevent the deposition or tracking of mud or debris from the Site onto public areas or highways:

- Site roads are maintained free of significant quantities of mud and debris;
- All operational areas are subject to monitoring by staff throughout their shift to identify accumulations of mud or debris requiring remedial action;
- Where necessary road cleaning equipment will be deployed; and
- All vehicles leaving operational areas are checked for cleanliness and cleaned if necessary to ensure that they are clear of loose waste.

If mud, debris or waste arising from the site is deposited onto public areas outside the site, the following remedial measures will be implemented:

- The affected public areas outside the site will be cleaned;
- Traffic will be isolated from sources of mud and debris within the site to prevent further tracking of mud and debris, and measures will be taken to clear any such sources as soon as practicable; and
- Provision will be made for road sweepers on the site access roads to stop any mud being carried onto public roads, and bowsers made available to damp down areas during dry periods to ensure that dust is not a problem.

5.9 Materials Input

This section describes the non-waste materials that will be used at the site. The selection and substitution of materials used are also discussed and the techniques used to minimise their use described. Measures include the keeping of an inventory of materials, minimisation, regular review of new developments in raw materials and the implementation of suitable substitutions where possible.

No raw materials are required for the processing plant for waste treatment, however a list of raw materials is detailed in Table 5-1 below – with the wetting agent for the fire suppression system having a consistent volume stored on site.



Table 5-1 Potentially Contaminating Liquids: Storage Arrangements

Type	Storage Location	Storage Arrangement
Gas Bottles	Eastern side of the waste processing building (external).	Locked gas cylinder cage.
Fuel Storage (Diesel Tank)	South west corner of the waste processing building (external).	Containers surrounded by a leakage containment bund capable of containing at least 110% of the volume of the largest container within the bund.
Ad Blue Tank	South west corner of the waste processing building (external).	Tank surrounded by a leakage containment bund capable of containing at least 110% of the volume of the largest container within the bund.
COSHH Storage Area	Western side of waste processing building (external).	Dedicated COSHH container surrounded by a leakage containment bund capable of containing at least 110% of the volume of the largest container within the bund.
Wetting Agent Storage for Helios fire suppression system	Within Helios fire suppression system area, east of waste processing building.	Biodegradable, environmentally friendly wetting agent (required for the fire suppression system) stored in IBC.

5.9.1 Raw Materials Selection

Wherever possible, raw materials will be selected that minimise environmental impact. Consideration will be given to such factors as degradability, bio-accumulation potential and toxicity. Reviews will be frequently undertaken to ensure that all raw materials are appropriate for use, that consumption is optimised and that opportunities for reduction and improvements are implemented.

Materials storage and management will be governed by Geminor’s EMS. An inventory of materials held and used will be maintained by the Site Manager. Geminor will periodically review the use and sourcing of raw materials and where cost effective environmental benefits can be obtained through the use of alternatives this is implemented. Quality assurance systems in place maintain materials quality requirements and stock levels will be minimised as far as practicable, consistent with operational needs.

5.10 Waste Minimisation

Given the nature of the processes, the opportunity for waste minimisation is limited. However, minimisation of waste will be considered as and when appropriate.

Use of raw materials and opportunities for substitution or minimisation will be considered as part of Geminor’s EMS.

Measures will be in place for the prevention and reduction of waste and will include:

- Process control and the site-specific WAP to minimise the creation of rejects or unacceptable materials; and
- Plant and equipment will be maintained on a routine basis to prevent breakdowns.



5.10.1 Waste Streams and General Arrangements

The site will generate relatively small amounts of waste that require disposal. The largest potential waste streams will be recycled in the process.

If required, other industrial and commercial waste which may arise as a result of the operations will be segregated and consigned to appropriate skip or container for onward disposal in compliance with the Duty of Care requirements as follows:

- General industrial waste will be contained within skips. This will be recycled off-site on a regular basis;
- Office waste will be contained in bins or closed skips; and
- Empty drums/containers will be stored within designated areas.

The Site Manager will be responsible for implementing waste management requirements and ensuring that silos, drums and all other storage areas are labelled and maintained in an appropriate location and condition. Staff will be responsible for ensuring waste is correctly consigned and for notifying the Site Manager when skips or containers may contain inappropriate items.

5.10.2 Disposal Options and Controls

Although not anticipated, any materials that are not recycled or re-used on site will be disposed off-site as controlled waste. All controlled waste will be disposed of in accordance with the duty of care requirements to licensed disposal facilities.

Copies of waste transfer notes will be held for a minimum of two years and any hazardous waste consignment notes (if required) will be held for a minimum of three years. Arrangements for disposal of waste will be reviewed annually by Geminor. This will provide checks on contractors and review of requirements for licensing and registration.

5.10.3 Records

Records will be maintained to satisfy the requirements of the Duty of Care requirements.

5.11 Waste Recovery or Disposal

Any containers are segregated, labelled, covered and maintained in a satisfactory condition. Storage areas are protected from vandalism by site security arrangements. Storage areas are designated and marked as appropriate.

Any waste produced in the process is either transferred offsite to a suitably licensed facility for further recovery or disposal.

5.11.1 Best Practicable Environmental Option (BPEO)

Waste management will be reviewed every year. This will be undertaken to confirm that the best environmental options are being used for the dealing with waste from the installation.

5.12 Energy Efficiency

Geminor is not a participant in a Climate Change Levy Agreement (CCA).



5.13 Energy Management System

5.13.1 Basic Energy Requirements – Energy Efficiency

Measures will be taken to minimise energy use by ensuring plant and equipment is not left running when not in use.

Energy use will be managed in conjunction with the EMS and reviewed as part of Geminor's energy procedure at least annually as one of the significant environmental aspects of operation. The purpose of the procedure is to reduce energy usage within the Company.

Energy specification and consumption of each unit operation for the treatment equipment is described within the EMS.

Periodic energy audits and training for key staff will take place. Areas where new technology provides an opportunity for energy reduction will be identified and incorporated into the relevant procedure.

The installation and equipment will be operated and maintained to minimise the use and loss of energy. Basic energy control measures will be in place:

- Process equipment will be turned off when not in use;
- Operating housekeeping and maintenance measures will be in place for the operation of the plant; and
- Where new equipment is purchased consideration will be given to energy efficiency.

5.14 A Changing Climate

Geminor recognise that a changing climate could affect future operations on site. Therefore, where relevant and applicable Geminor will consider the potential impact of a changing climate on their operations, and plan for potential negative climate impacts.

New guidance and information with regard to climate change will be reviewed, considered, and implemented where pertinent to operations on site.



6.0 Information

All relevant notifications and submissions to the EA regarding the site will be made in writing and quote the EP reference number and the name of the EP holder.

Records will be maintained for at least 6 years, however in the case of off-site environmental effects, and matters which affect the condition of land and groundwater, the records are to be kept until permit surrender. Duty of Care records will be kept for a minimum of 2 years.

6.1 Reporting and Notifications

6.1.1 Changes in Technically Competent Persons

The EA will be informed in writing of any changes in the technically competent management of the Site and the name of any incoming person, together with evidence that such person has the required technical competence.

6.1.2 Waste Types and Quantities

A summary report of waste types and quantities accepted and removed from the Site for each quarter, will be submitted to the EA within 1 month of the end of the quarter unless otherwise required by the EP conditions.

6.1.3 Relevant Convictions

The EA will be notified of the following events:

- Geminor being convicted of any relevant offence; and
- Any appeal against a conviction for a relevant offence and the results of such an appeal.

6.1.4 Notification of Change of Operator's or Holder's Details

The EA will be notified of the following:

- Any change in the operator's trading name, registered name or registered office address; and
- Any steps taken with a view to the company going into administration, entering into a company voluntary arrangement or being wound up.

6.1.5 Adverse Effects


The EA must be notified without delay following the detection of the following:

- Any malfunction, breakdown or failure of equipment or techniques;
- Any accident;
- Fugitive emissions which have caused, is causing or may cause significant pollution; and
- Any significant adverse environmental and health effect.



Appendix A Complaints Procedure and Record Form



	ENVIRONMENTAL MANAGEMENT SYSTEM Complaints Procedure	Appendix 05_Complaints
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1.0 PRINCIPLE

This section outlines the general procedure for receiving a complaint at the St Marks Street Materials Recycling Facility. The purpose of this procedure is to ensure that any site operative working on site is aware of the procedures for the correct recording of a complaint.

2.0 SCOPE

This procedure covers how to record and respond to a complaint.

3.0 RESPONSIBILITY

All site operatives are responsible for carrying out the procedure as detailed in Section 4 below. Any changes required are the responsibility of the Site Manager or designated person to update and re-issue the amended procedure.

4.0 COMPLAINTS RECORD


Any complaints received from the local public or any local receptor are to be recorded on the Complaints Record form, included as Appendix 5A. The complaint is also to be recorded in the site diary.

All site operatives are required to follow the steps set out below if a complaint is received at the site;

1. Record details of the complainant (including; name, address and a telephone number) if provided.
2. Make a record of the date and time the complaint was made.
3. What happened, what was the complaint actually about?
4. Was anyone else on site or other stakeholders aware of the issue and if so, who?
5. Once confirmation is made that the complaint issue relates to the site, investigate the source of the problem. Contact the Site Manager.
6. Record how the site has implemented methods to ensure the issue will not cause complaint in the future.
7. Make a record of any signs of pollution. If the complaint (such as emissions to groundwater or a local watercourse) is significant, the Environment Agency will need to be contacted on 0800 807060 as soon as possible. The severity of the incident shall be determined by the Site Manager.
8. The Site Manager shall send an email to the local Environment Agency office.
9. All Complaint Record forms shall be signed and dated.

Any actions taken in response to the complaint are to be recorded on the Complaints Record form (Appendix 5A) and the site diary.

On site visits, if the local Environment Agency Site Officer requests to see the site diary, all complaints should be shown.

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The complaints received are to be reviewed at future site audits to ensure these complaints will be avoided in the future.

5.0 HEALTH AND SAFETY

All site operatives shall work with due regard to all relevant Health and Safety Regulations currently in existence relevant to operations on site. All site operatives have a duty of care to report anyone who does not comply with the relevant Health and Safety Regulations to the Site Manager.

6.0 NOTIFICATION AND DISTRIBUTION LISTS

Once approved this document shall be published and will be effective from date of approval. Where appropriate, paper copies of this document shall be distributed as Controlled copies.

Electronic notification to named users shall be recorded in the Audit History Report when a document is published/becomes approved or effective.

7.0 CIRCULATION LIST

Location	Document Type
Site Office	Paper/Electronic copy
Head Office	Paper/Electronic copy

8.0 REVISION HISTORY

Version	Reason for Revision	Supersedes Document Dated	Signature of Site Manager
1.00	Original	N/A	


END OF DOCUMENT

Geminor UK Limited

ST MARKS STREET MATERIALS RECYCLING FACILITY COMPLAINTS FORM	
	REPORT No.
Message/Letter recieved by:	Date Recieved:
Passed to:	Time:
1) COMPLAINANT	
Name:	
Address:	
.....	
Post Code.....	
Telephone:.....	
2) NATURE OF COMPLAINT	
Description:	
Date of incident:.....	
3) INVESTIGATION AND ACTION TAKEN	
Complaintant contact: IN WRITING/TELEPHONE/FAX/E-MAIL/IN PERSON	
SIGNATURE:	
NAME:	
DATE:	

Appendix B Audit Procedures




	ENVIRONMENTAL MANAGEMENT SYSTEM Environmental Permit Audit Form	Appendix 06C Environmental Permit Audit Form
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Environmental Permit Audit Form

Date of Assessment:


Section Number	Condition Number	Requirements	Auditors Comments	Remedial Action Taken (if required)
1. MANAGEMENT				
1.1 General Management	1.1.1	The operator shall manage and operate the activities: (a) in accordance with a written management system, that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, and non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and (b) using sufficient competent persons and resources.		
	1.1.2	Records demonstrating compliance with condition 1.1.1 shall be maintained.		
	1.1.3	Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.		
	1.1.4	The operator shall comply with the requirements of an approved competence scheme.		
1.2 Energy	1.2.1	For the following activities referenced in		

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Section Number	Condition Number	Requirements	Auditors Comments	Remedial Action Taken (if required)
Efficiency		Schedule 1, table S1.1 (AR1 and AR2) the operator shall: (a) take appropriate measures to ensure that energy is used efficiently in the activities; (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and (c) take any further appropriate measures identified by a review.		
1.3 Efficient use of raw materials	1.3.1	For the following activities referenced in Schedule 1, table S1.1 (AR1 and AR2) the operator shall: (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities; (b) maintain records of raw materials and water used in the activities; (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and		

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Section Number	Condition Number	Requirements	Auditors Comments	Remedial Action Taken (if required)
		(d) take any further appropriate measures identified by a review.		
1.4 Avoidance, recovery and disposal of wastes produced by the activities	1.4.1	<p>The operator shall take appropriate measures to ensure that:</p> <ul style="list-style-type: none"> (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment. 		
	1.4.2	The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.		
2. OPERATIONS				

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Section Number	Condition Number	Requirements	Auditors Comments	Remedial Action Taken (if required)
2.1 Permitted Activities	2.1.1	The operator is only authorised to carry out the activities specified in Schedule 1, table S1.1 ('the activities').		
	2.1.2	For the following activities referenced in schedule 1, table S1.1. Waste authorised by this permit shall be clearly distinguished from any other waste on site.		
2.2 The site	2.2.1	The activities shall not extend beyond the site, being the land shown edged in green on the site plan at Schedule 7 to this permit.		
2.3 Operating techniques	2.3.1	The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.		
	2.3.2	If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan , and shall implement the approved revised plan in place of the original		

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		from the date of approval, unless otherwise agreed in writing by the Environment Agency.		
	2.3.3	Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table		
	2.3.4	Waste shall only be accepted if: (a) it is of a type and quantity listed in schedule 2 table S2.2; and (b) it conforms to the description in the documentation supplied by the producer and holder.		
	2.3.5	The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that the operation is provided with the following information, prior to the receipt of the waste: (a) the nature of the process producing the waste; (b) the composition of the waste; (c) the handling requirements of the waste; (d) the hazardous property associated with the waste, if applicable; and (e) the waste code of the waste.		

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Section Number	Condition Number	Requirements	Auditors Comments	Remedial Action Taken (if required)
	2.3.6	The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.		
3. EMISSIONS AND MONITORING				
3.1 Emissions to water air or land	3.1.1	There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 table S3.1.		
	3.1.2	The limits given in schedule 3 shall not be exceeded.		
3.2 Emissions of substances not controlled by emissions limits	3.2.1	Emissions of substances not controlled by emissions limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including but not limited to, those specified in any approved emissions management plan have been taken to prevent, or where that is not practicable, to minimise those emissions.		
	3.2.2	The operator shall: <ul style="list-style-type: none"> (a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period 		

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Section Number	Condition Number	Requirements	Auditors Comments	Remedial Action Taken (if required)
		<p>specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emissions limits;</p> <p>(b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.</p>		
3.3 Odour	3.3.1	<p>Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent, or where that is not practicable to minimise the odour.</p>		
3.4 Noise and Vibration	3.4.1	<p>Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.</p>		

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Section Number	Condition Number	Requirements	Auditors Comments	Remedial Action Taken (if required)
3.5 Monitoring	3.5.1	The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit: (a) point source emissions specified in tables S3.1.		
	3.5.2	The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.		
	3.5.3	Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, unless otherwise agreed in writing by the Environment Agency.		
3.6 Pests	3.6.1	The activities shall not give rise to the presence of pests which are likely to cause pollution, hazard or annoyance outside the boundary of the site. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved pests management plan, have been taken to prevent or where that is not practicable to minimise the presence of pests on site.		

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Section Number	Condition Number	Requirements	Auditors Comments	Remedial Action Taken (if required)
	3.6.2	The operator shall: (a) if notified by the Environment Agency, submit to the Environment Agency for approval within the period, a pests management plan which identifies and minimises risks of pollution from pests; (b) implement the pests management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.		
3.7 Fire Prevention	3.7.1	The operator shall take all appropriate measures to prevent fires on site and minimise the risk of pollution from them including, but not limited to, those specified in any approved fire prevention plan.		
4 INFORMATION				

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Section Number	Condition Number	Requirements	Auditors Comments	Remedial Action Taken (if required)
4.1 Records	4.1.1	All records required to be made by this permit shall: <ul style="list-style-type: none"> (a) be legible; (b) be made as soon as reasonably practicable; (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and (d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender: <ul style="list-style-type: none"> i. off-site environmental effects; and ii. matters which affect the condition of the land and groundwater. 		
	4.1.2	The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.		
4.2 Reporting	4.2.1	The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.		

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	4.2.2	<p>For the following activities referenced in schedule 1, table S1.1 (AR1 to AR3) a report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:</p> <p>(a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;</p> <p>(b) the annual production/treatment data set out in schedule 4 table S4.2; and</p> <p>(c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.</p>		
	4.2.3	<p>Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:</p> <p>(a) in respect of the parameters and emission points specified in schedule 4, table S4.1;</p> <p>(b) for the reporting periods specified in schedule 4, table S4.1 and using the forms specified in schedule 4, table S4.4; and</p>		

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Section Number	Condition Number	Requirements	Auditors Comments	Remedial Action Taken (if required)
		(c) giving the information from such results and assessments as may be required by the forms specified in those tables.		
	4.2.4	The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.		
	4.2.5	Within one month of the end of each quarter, the operator shall submit 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.		
4.3 Notifications	4.3.1	In the event: (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately— (i) inform the Environment Agency, (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and (iii) take the measures necessary to prevent further possible incidents or accidents;		

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Section Number	Condition Number	Requirements	Auditors Comments	Remedial Action Taken (if required)
		<p>(b) of a breach of any permit condition the operator must immediately—</p> <p>(i) inform the Environment Agency, and</p> <p>(ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;</p> <p>(c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.</p>		
	4.3.2	<p>Any information provided under condition 4.3.1 (a)(i) or 4.3.1 (b)(i) where the information relates to the breach of a limit specified in the permit, shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.</p>		
	4.3.3	<p>The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:</p> <p>Where the operator is a registered company:</p> <p>(a) any change in the operator's trading name,</p>		

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		<p>registered name or registered office address; and</p> <p>(b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.</p> <p>Where the operator is a corporate body other than a registered company:</p> <p>(a) any change in the operator's name or address; and</p> <p>(b) any steps taken with a view to the dissolution of the operator.</p> <p>In any other case:</p> <p>(a) the death of the named operators (where the operator consists of more than one named individual)</p> <p>(b) any change in the operator's name(s) or address(es); and</p> <p>(c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.</p>		
	4.3.4	<p>Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise</p>		

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Section Number	Condition Number	Requirements	Auditors Comments	Remedial Action Taken (if required)
		<p>the subject of an application for approval under the Regulations or this permit: (a) the Environment Agency shall be notified at least 14 days before making the change; and (b) the notification shall contain a description of the proposed change in operation.</p>		
	4.3.5	The Environment Agency shall be given at least 14 days' notice before implementation or any part of the site closure plan.		
4.4 Interpretation	4.4.1	In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.		
	4.4.2	In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "without delay", in which case it may be provided by telephone.		
Schedule 1 Operations	- Table S1.1 Activities	AR1: Activity listed in schedule 1 of the EP Regulations S5.4 Part A(1)(a)(ii) Description of specified activity and WFD Annex I and II Operations D9: Physico-chemical treatment of waste prior to any other disposal operation D14: Repackaging prior to submission to any of the operations numbered D1 to D12. D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary		

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Section Number	Condition Number	Requirements	Auditors Comments	Remedial Action Taken (if required)
		<p>storage, pending collection, on the site where the waste is produced).</p> <p>Limits of activities: Pre-treatment of waste to produce Refuse Derived Fuel (RDF). Treatment operations shall be limited to physical and mechanical treatment consisting of sorting, screening, shredding and separating, baling and wrapping. Non-hazardous waste types as specified in Schedule 2 table S2.2.</p> <p>Directly Associated Activity: AR2: Storage of non-hazardous waste prior to treatment</p> <p>Description of specified activity and WFD Annex I and II Operations D14: Repackaging prior to submission to any of the operations numbered D1 to D12. D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where the waste is produced)</p> <p>Limits of Activities: Storage shall be on an impermeable surface with sealed draining.</p> <p>AR3: Description of specified waste activity and WFD Annex I and II Operations</p>		

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		<p>R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).</p> <p>R3: Recycling/reclamation of organic substances which are not used as solvents.</p> <p>R4: Recycling/reclamation of metals and metal compounds.</p> <p>R5: Recycling/reclamation of other inorganic compounds</p> <p>Limits of activities: Treatment and storage of non-hazardous waste – operations shall be limited to: Physical treatment including sorting, separating, screening, baling and shredding for the purpose of recovery. Treatment shall be carried out in an enclosed building and on an impermeable surface with sealed drainage system. Waste types as specified in Table 2.2.</p>		
	Table S1.2 Operating techniques	<p>Description: Application</p> <p>Parts: Sections 1.2, 1.4, 1.6 and 1.8 of the application documents provided in response to section 3a – technical standards, Part B3 of the application for,</p> <p>Date Received 12/12/2019</p> <p>Description Application</p> <p>Parts Best Available Operating Techniques</p>		

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Section Number	Condition Number	Requirements	Auditors Comments	Remedial Action Taken (if required)
		Document Date Received 12/12/2019 Description Application Parts Odour Management Plan Reference 419.08768.00001 August 2019 Date Received 12/12/2019 Description Application Parts Noise and Vibration Management Plan Date Received 12/12/2019 Description Application Parts Pest Management Plan Reference 419.09678.00001 version 1 Date Received 12/12/2019 Description Additional Information Parts Fire Prevention Plan Revised – Version 2 Date 06/05/2020		
Schedule 2 – List of Permitted Waste	Table S2.2 Permitted waste types and quantities for the RDF Facility and the Materials Recycling Facility.	Refer to table S2.2 at the end of this audit form.		

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Section Number	Condition Number	Requirements	Auditors Comments	Remedial Action Taken (if required)
Schedule 3 – Emissions and monitoring		<i>Refer to table S3.1 at the end of this audit form</i>		
Schedule 4 - Reporting		<i>Refer to tables S4.2 and S4.3 in the EP.</i>		
Schedule 5 - Notification		<i>Refer to permit for Part A and Part B standard notification forms</i>		
Schedule 6 - Interpretation		<i>Refer to permit for standard interpretation of terms</i>		
Schedule 7 – Site plan		<i>Refer to permit EPR/GP3303PN for site plan</i>		



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Table S2.2 Permitted waste types and quantities for the RDF Facility and the Materials Recycling Facility

Maximum Quantity	150,000 tonnes per year
Waste code	Description
19	Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 07	Wood other than that mentioned in 19 12 06
19 12 10	Combustible waste (refuse derived fuel)
19 12 12	Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11
20	MUNICIPAL WASTES AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	Separately collected fractions
20 01 01	Paper and cardboard
20 01 02	Glass
20 01 38	Wood other than that mentioned in 20 01 37
20 01 39	Plastics
20 01 40	Metals
20 02	Separately collected fractions (except 15 01)
20 02 01	Biodegradable waste
20 02 02	Soil and stones
20 02 03	Other non-biodegradable wastes
20 03	Other municipal wastes
20 03 01	Mixed municipal waste
20 03 02	Street-cleaning residues
20 03 07	Bulky waste

Table S3.1 Point source emissions to sewer, effluent treatment plant, or other transfers off-site – emission limits and monitoring requirements

Monitoring point reference	Source	Parameter	Limit (including unit)	Reference Period	Monitoring frequency	Monitoring standard or method
Surface water flow control box to sewage Treatment Works shown on site plan in schedule 7	Uncontaminated surface water from roofs and gutters	None	None	-		

	ENVIRONMENTAL MANAGEMENT SYSTEM Monthly Auditing Checklist	Appendix 6A Monthly Auditing Checklist
		Version: 1 Effective: March 2023
Authored by: SLR Date: March 2023	Reviewed by:	Approved by:

Date of Audit:	Auditor:	Supervisor or Manager:

1	Housekeeping	Findings Y/N	Comments
	General tidiness		
	Tools and parts returned to proper place		
	Walkways and work surfaces free of obstacles and trip/slip hazards		
	All exits free of obstacles inside and outside.		
	Spills or wet areas (slip hazards) cleaned up immediately, if not, have they been isolated.		
2	PPE	Findings Y/N	Comments
	All employees in work areas of yard wearing appropriate PPE		
	Safety shoes and glasses, face shield (where eye injury is possible)		
	Hearing protection, hard hats (where necessary)		
	Apron, goggles and gloves when moving or charging batteries.		
3	Safe Operating Practises	Findings Y /N	Comments



ENVIRONMENTAL MANAGEMENT SYSTEM

Monthly Auditing Checklist

Appendix 6A Monthly Auditing Checklist

Version: 1
Effective: March 2023


Authored by: SLR

Reviewed by:

Approved by:

Date: March 2023

	All employees observed following Safe Systems of Work		
	All Visitors in designated areas		
4	Risk Assessments	Findings Y/N	Comments
	Are risk assessments current and up-to-date?		
	Are risk assessments being complied with access to Site, de-sheeting procedure?		
5	Machine Guards	Findings Y/N	Comments
	Are guards in place on moving mechanical devices?		
6	Fire Safety	Findings Y/N	Comments
	Have fire drills been carried out?		
	Is fire detection and suppression system working?		
7	Waste containers/bays displaying & storing correct wastes	Findings Y/N	Comments
	All bays labelled to reflect contents		
	Waste stored in correct storage bays		
	Waste stored is within permitted limits?		

	ENVIRONMENTAL MANAGEMENT SYSTEM Monthly Auditing Checklist	Appendix 6A Monthly Auditing Checklist
		Version: 1 Effective: March 2023
Authored by: SLR	Reviewed by:	Approved by:
Date: March 2023		

8	Evidence of spills in the yard and equipment storage areas	Findings Y/N	Comments
	Are stains, dead vegetation, oil or diesel evident in the yard or equipment storage areas?		
	Have the spill/containment kit and associated materials been replenished; including absorbent granules, pads, booms, floor Dry, bio mediation product, shovels, bags, etc?		
9	Are the following areas clean and tidy	Findings Y/N	Comments
	Staff welfare		
	Working areas		
	Toilets		
	Fridge		
10	Welfare Signs	Findings Y/N	Comments
	Are No Smoking signs displayed?		

END OF DOCUMENT

Date: March 2023
Location: St Marks Street, Materials Recycling Facility
Date
Auditor:
Supervisor or Manager:

<i>Check Item</i>	<i>Findings</i>		<i>Comments</i>
Housekeeping: General tidiness, tools and parts returned to proper place, walkways and work surfaces free of obstacles and trip/slip hazards, All fire exits free of obstacles inside and outside, Spills or Wet areas (Slip Hazards) cleaned up immediately, if not, marked off.	Yes	No	
All employees in work areas of yard wearing appropriate PPE: Safety shoes and glasses, face shield where eye injury is possible, hearing protection, hard hats when necessary, rubber boots in washbays, apron, goggles and gloves when moving or charging batteries	Yes	No	
MSDS: Up to date, including Risk Assessments and accessible to all employees. (Employees must know how to use MSDS to obtain information on chemicals.)	Yes	No	
Fire Extinguishers inspected annually (tagged), mounted and marked in designated location of workshop, office, operational buildings and yard. Verify other fire fighting equipment intact, i.e. smoke alarms, detection and suppression.	Yes	No	
Company vehicles properly maintained: both mechanically and kept in a clean condition.	Yes	No	
Evidence of spills in the yard and equipment storage areas: stains, dead vegetation, oil or diesel. If yes what action has been taken.	Yes	No	
Spill Containment Materials Available to personnel and in proximity of possible contamination area:	Yes	No	
Are No Smoking Signs Displayed	Yes	No	
All containers labelled to reflect contents and waste in correct storage containers including rubbish cans, used oil buckets, aerosols etc...to reflect contents	Yes	No	
Signs in place including, visitors, face shields, exit, eye wash stations, fire extinguishers,	Yes	No	
Emergency information posted, including phone numbers, evacuation routes, Emergency Response Plans, Environmental Contingency Plan.	Yes	No	


Date: March 2023

Location: St Marks Street, Materials Recycling Facility
Date
Auditor:
Supervisor or Manager:

<i>Check Item</i>	<i>Findings</i>		<i>Comments</i>
Is someone on site first-aid at work trained and name displayed in office? Are all first aid boxes and eye wash stations in good working order?	Yes	No	
All Portable appliances tested and electrical cords not frayed and in good working order.	Yes	No	
Comments			

Appendix C Site and Equipment Maintenance Plan and Procedures



	ENVIRONMENTAL MANAGEMENT SYSTEM Maintenance Procedure	Appendix 07 Maintenance Procedure
		Version: 1 Effective: March 2023
Authorized by: SLR	Reviewed by:	Approved by:
Date: March 2023		Template Version No. 1.00

1.0 PRINCIPLE

This section outlines the maintenance program currently implemented on site.

2.0 SCOPE

This procedure covers the maintenance programme and recording that all St Marks Street Materials Recycling Facility operatives must adhere to at all times.

3.0 RESPONSIBILITY

All site operatives are responsible for carrying out the procedure as detailed below in Section 4. Any changes required are the responsibility of the Site Manager or designated person to update and re-issue the amended procedure.

4.0 MAINTENANCE CHECKLISTS

All maintenance audits and monitoring shall be carried out in accordance with the Manufacturer's specifications, which are kept in the head office or available online.

This procedure details a proactive approach to a planned preventative maintenance program for the site to follow. The Maintenance Checklist included as Appendix 7A allows all site operatives to actively take part in the sites maintenance schedule.

The Checklist shall be completed and maintained by the Site Manager, with the following information compiled;


- The item that requires maintenance;
- How often maintenance needs to be carried out;
- A record of any particular maintenance instructions; and
- Who on site is responsible for each maintenance check.

The Checklist shall ensure that all site operatives are aware of their particular responsibilities for maintenance checking. The Site Manager shall ensure that all site operatives are aware of any amendments and additions to the checklist.

When a maintenance issue is dealt with, the Maintenance Record form shall be completed for each separate piece of equipment or infrastructure. This record form is included as Appendix 7B.

This record form includes the following information to be recorded;

- The item required for maintenance;
- The frequency of the required maintenance for instance; daily, weekly or monthly;
- Completed date and who carried out by; and
- Any particular comments.

	ENVIRONMENTAL MANAGEMENT SYSTEM Maintenance Procedure	Appendix 07 Maintenance Procedure
		Version: 1 Effective: March 2023
Authorized by: SLR	Reviewed by:	Approved by:
Date: March 2023		Template Version No. 1.00

The record forms shall be kept in the site office to ensure there is access for all site operatives to the records.

5.0 HEALTH AND SAFETY

All site operatives will work with due regard to all relevant Health and Safety Regulations currently in existence relevant to operations on site.

6.0 NOTIFICATION AND DISTRIBUTION LISTS

Once approved this document shall be published and will be effective from date of approval. Where appropriate, paper copies of this document shall be distributed as Controlled copies.

The appropriate QA Administrator (QAA) shall be responsible for updating a distribution list for each paper copy issued. The QAA is also responsible for the retention of a file copy for Business Continuity.

Electronic notification to named users shall be recorded in the Audit History Report when a document is published/becomes approved or effective.

7.0 CIRCULATION LIST

Job Title	Job holder at time of issue
Site Office	Paper copy

8.0 REVISION HISTORY

Version	Reason for Revision	Supersedes Document Dated	Signature of Site Manager
1.0	Original	N/A	

END OF DOCUMENT



Appendix A - Maintenance Checklist

Use as many forms as required, photocopy this blank form before first use to ensure you have easily accessible copies for the future.

Item requiring maintenance	How often? (tick the appropriate box)						Where are maintenance instructions?	Who is responsible ?
	Day	Week	Month	Year	2 years	5 years		

Geminor UK Limited,
Materials Recycling Facility,
St Marks Steet,
Hull,
HU8 7EB



Appendix B - Maintenance Record

Item:		Due:
<i>Completed on</i>	<i>Completed by</i>	<i>Comments</i>

Appendix D Waste Acceptance Procedure



Schedule 2 Council's Requirements

Residual Waste Processing Specification

Annex 2 - Waste Acceptance Procedure

1. Purpose

The purpose of the Waste Acceptance Procedure (WAP) is to ensure that all Contract Waste is received appropriately by the Contractor at the Residual Waste Processing Facility (the Facility).

The WAP outlines the process and standards for Waste Acceptance at the Facility, the responsibility of the Council and the Contractor, and defines the actions to be taken when Contract Waste delivered by the Council or collected by the Contractor from the Transfer Loading Stations (TLS) does not meet the Contamination Thresholds for Residual Waste outlined in the Waste Acceptance Criteria at Appendix 1 to this WAP.

2. Pre-Acceptance Waste Procedure

The Contractor will ensure that all waste destined to be accepted at the Facility, meets the Waste Acceptance Criteria detailed in Appendix 1 to this WAP.

3. Waste Acceptance

3.1. Responsibility

The Contractor is responsible for collecting Contract Waste from the TLS and receiving it at the Facility.

The Council is responsible for the direct delivery of Contract Waste to the Facility and (via the TLS Operator) for loading the Contractor's vehicles with Contract Waste at the TLS.

In the event that Contract Waste collected from the TLS or delivered directly to the Facility does not meet the Contamination Thresholds when it is received at the Facility, the Waste remains Contract Waste and it will be managed in accordance with the WAP.

The Contractor is responsible for monitoring each individual Load of Contract Waste for compliance with the Contamination Thresholds.

3.2. Accepted Material

The Waste Acceptance Criteria for Contract Waste, including a list of targeted materials and Contamination Thresholds are detailed at Appendix 1.

3.3. Delivery of Waste by Authorised Vehicles and by Contractor's Vehicles

The Contractor's Service Delivery Plan will outline the Contractor's operating procedure in connection with the Acceptance of Waste at the Facility. The procedure will be required to cover weighing, tipping and inspection as set out below.

When an Authorised Vehicle or a Contractor's vehicle delivering Contract Waste arrives at the Facility, the vehicle will be weighed and the driver will confirm the type of Waste being delivered. The Contractor shall then direct the driver to the designated tipping area.

3.4. Initial Inspection

Once the vehicle has deposited its Load in the designated tipping area the Contractor shall carry out an initial inspection of each Load for Contamination in accordance with the Waste Acceptance Criteria. If the Load passes the initial inspection then it shall be deemed as meeting the Contamination Thresholds.

3.5. Contamination and Prohibited Materials

The Council's TLS Operator will Accept Contract Waste at the TLS and take similar steps to those outlined in paragraph 3.6 below to reduce Contamination in the Contract Waste loaded on to the Contractor's vehicles. The process will help ensure that Contract Waste predominantly meets the Contamination Thresholds.

It is not practical to ensure that Contract Waste delivered to the Facility by the Council or loaded on to the Contractor's vehicles at the TLS is completely free of Contamination. The Contractor shall Accept as Contract Waste, all Waste delivered or collected in connection with the Contract.

Contamination is defined as any material contained in Contract Waste that is not targeted or Accepted by the Council as specified in the Waste Acceptance Criteria.

Prohibited Materials include any material which would put the Contractor in breach of any Consent applying to the Facility. Prohibited Materials shall be regarded as Contamination.

The Council will not knowingly deliver Prohibited Materials to the Facility or arrange for it to be loaded into the Contractor's vehicles.

3.6. Waste Reclassification Criteria

All Loads shall be subject to the following procedures:

- I. A Load that contains Contamination levels below the Contamination Thresholds as outlined in the Waste Acceptance Criteria, which requires no additional work to remove, shall be Accepted;
- II. A Load shall only be reclassified following agreement with the Supervising Officer and/or in accordance with paragraphs 3.7 and 3.8 below;
- III. A Load shall not be reclassified where Contamination or Prohibited Materials can be readily isolated and removed within ten (10) minutes, by minimal and safe use of a loading shovel, hand sorting or picking. In this circumstance only the element of Contamination and/or Prohibited Materials shall be removed and reclassified as Contamination;

- IV. Subject to (II) and (III) above, where a Load of Contract Waste cannot be brought within the Contamination Thresholds, the Load shall be reclassified and Accepted as a contaminated Load;
- V. The Contractor shall take all reasonable steps to manage and process the contaminated Load at the Facility. Where Prohibited Materials or contaminated Loads are removed from the Facility the Contractor shall arrange for its disposal at the lowest cost permitted facility. Any additional cost will be borne by the Council based on Verifiable Actual Costs; and
- VI. Where the Contractor identifies to the Supervising Officer that a Load is contaminated, the Supervising Officer will use their reasonable endeavours to ensure that the source of the Contamination is identified and future Contamination minimised.

3.7. Council Notification & Joint Inspection

Except in cases of emergency, or regulatory restriction, any Prohibited Material or Load deemed by the Contractor not to meet the Contamination Thresholds will be quarantined and stored separately on site for up to twenty four (24) hours pending a joint inspection by the Contractor, the Supervising Officer and in the case of Contract Waste collected from a TLS, the TLS Operator.

Where the Contractor believes a Load does not comply with the Contamination Thresholds the Contractor will supply to the Council, and the TLS Operator if appropriate, within one (1) hour, details of the Prohibited Materials or contaminated Load. This should include:

- The estimated level of Contamination;
- A broad description of the nature of the Load and/or contaminated material;
- The vehicle registration number; and
- Arrival time at the site and whether the Contractor is able to separate and remove Contamination or Prohibited Material.

Where a joint inspection is not possible the Contractor will, in addition, provide the Supervising Officer with photographic evidence of the Contamination.

3.8. Agreement on Reclassification

Where the Contractor and the Supervising Officer agree that any Load of Contract Waste failed to meet the Contamination Thresholds such Loads shall be reclassified in accordance with the Criteria at 2.6 above.

3.9. Not used

3.10. Quality Issues and Contamination

The Contractor's Representative and the Supervising Officer will continually review quality and Contamination issues, and seek ways to secure remedial action as soon as practicable.

The WAP and Waste Acceptance Criteria may be varied by agreement between the Contractor and the Supervising Officer. Acceptance of any reasonable request by the Council shall not be unreasonably withheld by the Contractor.


Appendix 1: Waste Acceptance Criteria

Table 1.

Accepted	Targeted	Non - Targeted	Contamination Thresholds
Residual Waste from households or flats	<p>Waste not able to be recycled, re-used or composted including:</p> <p>Kerbside collected Waste</p> <p>Kerbside Dry Recyclable Waste or Organic Waste that is reclassified as Waste due to excess Contamination.</p>	<ul style="list-style-type: none"> • Mechanical street sweepings • Gully Waste • Clinical Waste • Hazardous Waste • Parks Waste • Any bulky item that will not fit in a standard 240 litre wheeled bin, e.g. mattresses, large domestic appliances etc. 	<p>Any Load containing 10% or more non-targeted materials by weight.</p> <p>Any Prohibited Materials that would put the Contractor in breach of any Environmental Permit or other regulatory Consent applying to the Facility.</p>

Appendix E Daily Site Monitoring Procedure



	ENVIRONMENTAL MANAGEMENT SYSTEM Daily Site Monitoring	Appendix 04 Daily Site Monitoring Procedure
		Version: 1 Effective: March 2023
Authored by:	Reviewed by:	Approved by:
Date: March 2023		

1.0 PRINCIPLE

This section outlines the general procedures for completing the daily site monitoring checklist at the St Marks Street Materials Recycling Facility. The purpose of this procedure is to ensure that any site operative working on site is aware of this procedure.

2.0 SCOPE

This procedure covers the completion of the daily site monitoring checklist at the facility.

3.0 RESPONSIBILITY

All site operatives are responsible for carrying out the procedure as detailed in Section 4.0. Any changes required are the responsibility of the Site Manager or designated person to update and re-issue the amended procedure.

4.0 PROCEDURE

Daily Site Monitoring Checklist


The Site Manager or designated person will be responsible for the completion of the daily site monitoring checklist (Appendix 4A)

The operative will, on a daily basis, carry out a site monitoring tour completing the list, answering yes or no as to whether the site is compliant or not. If there are any further issues, these comments will also be recorded.

5.0 HEALTH AND SAFETY

All site operatives will work with due regard to all relevant Health and Safety Regulations currently in existence relevant to operations on site. All site operatives have a duty of care to report anyone who does not comply with the relevant Health and Safety Regulations to the Site Manager.

END OF DOCUMENT


	ENVIRONMENTAL MANAGEMENT SYSTEM	Appendix 4A – Daily Site Monitoring Checklist
	Daily Site Monitoring Checklist	Version: 1 Effective: March 2023
Authorized by: SLR	Reviewed by:	Approved by:
Date: March 2023		

Daily Monitoring Checklist for St Marks Street Materials Recycling Facility


Date:

Assessor:

Inspection Areas	Compliant		Comments
	Yes	No	
Technically Competent Manager on site – attendance hours on site, any compliance issues dealt with, any issues that need to be dealt with (please detail in the comments section).			
Permitted Waste – has only permitted waste been accepted on site? Has any non-conforming waste been accepted?			
Waste Bays Permitted Levels – are the waste bays filled to permitted levels?			
Site Floor Swept – has the site floor been swept?			
Access Road – is the area clear of mud and litter? Is there suitable access to the site for all vehicles?			
Internal Roads – are roads clear of mud and litter?			
Site Gate/Barrier – is the gate in good condition and suitable for use?			
Perimeter Fencing – any deterioration noted or any repairs required?			
Weighbridge (in and out) – clear and suitable for use? Calibration records up to date?			
Fire Extinguishers – are all fire extinguishers in place?			
Spill Kits – are all spill kits in place?			
Litter/General Site Tidiness – are there any litter/waste spillages in the yard area? Has any litter escaped the site boundary?			
Meteorological Conditions – ensure record of wind speed and direction is			

	ENVIRONMENTAL MANAGEMENT SYSTEM	Appendix 4A – Daily Site Monitoring Checklist
	Daily Site Monitoring Checklist	Version: 1 Effective: March 2023
Authorized by: SLR	Reviewed by:	Approved by:
Date: March 2023		

kept.			
Site Office – is the site office sufficiently staffed? Is the EMS and Environmental Permit available to all site operatives/visitors?			
Vermin/Birds – are there any signs of birds, rats etc.			
Noise – is there excessive noise associated with operations on site? Is the level of noise at the site boundary/entrance acceptable?			
Dust – are there any signs of dust within and outside the site boundary?			
Odour – is there any particularly odorous waste stored on site, if so – sniff test undertaken to ensure odour levels are controlled, if particularly odorous – discuss with the Site Manager and refer to Section 5.0 of the EMS and the Odour Management Plan.			
Surface drainage – are all drains clear of debris and in good working order? Is all surfacing in site condition?			
Lighting – is the site lit sufficiently?			
Maintenance Schedule – is the schedule up to date? Is all plant fit for purpose?			
Fuel storage/Chemical Storage – is the fuel storage area bunding in good working order/fit for purpose? Check for any leaks or spills.			
Condition of welfare facilities – general good housekeeping checks – clean, tidy, health and safety (trip hazards etc.)			
Visitors on site – if there are any visitors, have they signed into the visitor’s book, wearing the appropriate Personal Protective Equipment (PPE) (boots, high visibility jacket, hard hat and goggles) and accompanied by a site operative?			
Complaints – any complaints			

	ENVIRONMENTAL MANAGEMENT SYSTEM	Appendix 4A – Daily Site Monitoring Checklist
	Daily Site Monitoring Checklist	Version: 1 Effective: March 2023
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Date: March 2023		

received that need to be recorded?			
Condition of CCTV and alarm – ensure the equipment is in good working order and fit for purpose.			
Breakdowns – any vehicle or plant breakdowns?			
Pollution Incident – have there been any pollution incidents identified – in terms of dust, spillages, odour etc.			
Site Board – is the board in good working order and can be read? ?			
Tanks – are all tanks in good working order, bunds empty, no spillages?			
First Aid Stocks – are all first aid boxes filled with appropriate contents? If not, make a record and discuss with the Site Manager.			
Electrical Risks			
Trip Hazards – are all areas of the site clean and tidy, no trip hazards in areas where pedestrians walk?			
Fire Prevention Specific Checks			
No signs of fire in waste piles e.g. burning/visibly hot/smouldering/producing steam or heat If sign of fire is detected contact site manager immediately.			
Waste contained within designated storage bays and within permitted limits.			
Detection system in working order.			
Suppression system in working order.			
Escape routes and fire exits unobstructed.			
Fire extinguishers available and unobstructed.			
No hot exhausts before site shuts down. <i>Prior to closing the site at the end of</i>			

