

# ELTON 2 RESTORATION ENVIRONMENTAL PERMIT APPLICATION

## **Operating Techniques**

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## 1.0 INTRODUCTION

### 1.1 Overview

Ingrebourne Valley Limited (IV) has retained SLR Consulting Limited (SLR) to prepare an Environmental Permit application to authorise the deposit of waste for recovery for the restoration of Elton 2 (the Site), located near Warmington, Northants as a waste recovery operation.

This Site Operating Techniques forms part of the EP application and provides the following information:

- A summary of the operating times and staffing of the Site.
- Details of the types of waste that can be deposited at the Site, where they can be deposited in the Site, and the procedures that must be followed for their acceptance.
- Details of the Site preparation before and during filling.
- A description of how the waste is to be deposited.
- Details of the Site infrastructure.
- An environmental nuisance risk assessment.
- Details of the measures that will be implemented to control environmental nuisance.
- Details of the records that are to be maintained.

### 1.2 The Project

The Site is approximately 20 hectares in size and prior to development consisted mainly of agricultural pasture used for livestock grazing, with a commercial poplar plantation near the eastern boundary. Approximately 850 – 900,000 tonnes of sand and gravel will be extracted from the Site and the resulting void will be restored using a combination of site-won overburden, silt from the processing of the mineral and imported inert wastes, with a final layer comprising replacement of the site-derived topsoil.

The maximum ground water level is between 0.5 and 1m below the current ground levels. The Site will not be dewatered for mineral extraction or restoration as, given the hydrological setting of the Site, this would be impractical given the large volumes of groundwater which would need to be abstracted.

The restoration area of the Site is divided into Eastern, Central and Western areas as shown in Drawing 04 Sequence of Operations. The planning permission requires the phases to be worked sequentially from east to west. Mineral extraction commenced in December 2021 and it is anticipated that the Site will be restored by 2030.

The preferred restoration approach is that in-situ clay overburden will be end-tipped into water within the void as mineral extraction proceeds, to form a side-wall attenuation barrier against the basal clay before the rest of the void in each area is restored using imported inert waste. However, the operational and timescale requirements of the planning permission place some constraints on how the Site can be constructed; for example, it is not possible to place a barrier around the entire Site to manage groundwater as planning permission means only one phase can be worked at a time. Therefore, other options have also been assessed in addition to the preferred approach to manage any operational and timescale complexities that may arise. These include:

- Commencement of phase 1 infill using in-situ overburden and silt only, in case delays in obtaining the environmental permit puts planning timescale requirements at risk; and

- Construction of a cut-off wall using specialist techniques in the case that side slope stability issues are encountered.

Up to 550,000m<sup>3</sup> of imported inert waste in total, comprising carefully selected soil and stones from naturally occurring or low contamination sources, will be used for infill at a rate of approximately 75,000m<sup>3</sup> per annum. In addition, the restoration will incorporate approximately 284,340 tonnes of site-won overburden placed either as a side wall barrier or infill, and approximately 75,295 tonnes of silt recovered from the settlement lagoons in the processing area, following washing of the mineral.

Imported inert wastes for restoration will be initially tipped in the processing and waste storage area (to be regulated under a separate permit). They will have undergone rigorous waste acceptance checks to ensure that they are chemically and physically suitable for placement as restoration materials. If required, imported inert waste will be screened to separate oversize material which will then be reduced in size using a mobile crushing unit before being used for restoration.

Articulated dump trucks (ADT) will be used to transfer the imported inert wastes to the restoration area of the Site where they will be placed into water against the natural basal clay and side wall attenuation barrier in each phase.

Once restoration with inert waste has been completed to the required levels, the reserved topsoils will be placed on the surface to return the Site to agricultural use. In addition, a new wet woodland area designed to enhance local biodiversity will be established near the eastern boundary of the site to replace the poplar plantation which was felled when the development commenced. The restoration and final contours are shown in Drawing 04 Restoration Scheme.

## 2.0 GENERAL CONSIDERATIONS

### 2.1 Hours of Operation

Working hours will be between 07:00 – 18:00 hours Monday – Friday, 07:00 – 13:00 hours on Saturdays and no working on Sundays or Bank Holidays. No removal of material, acceptance of waste or operations will be conducted outside of these hours.

### 2.2 Staffing and Supervision

The aim of the Company is to provide a well-managed Site operated in accordance with the EP and all associated documents and in particular this Site Operating Plan, using technically competent and trained staff.

The Site management structure is shown in the diagram on the following page.

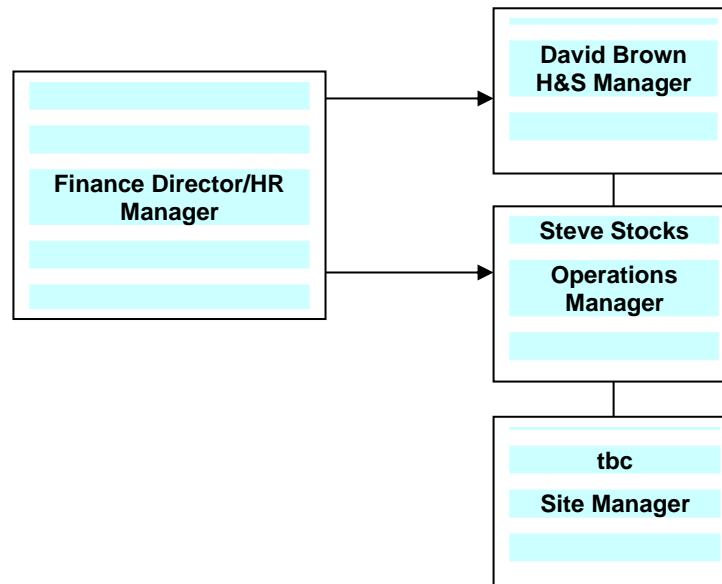
The Site will have a complement of 5 – 8 staff, depending on operational progress. During busy times and holidays, additional suitably qualified staff are available as back up. In addition, IV's Health and Safety Manager provides health and safety support and human resources advice.

The Site supervisor has the main responsibility for the day-to-day operation of the facility.

James Sutton, one of the company technical competent managers, will carry out the duties of the COTC holder.

Copies of the appropriate WAMITAB Certificates (for Technical Competence and Qualifying Experience) for the operation of the Site are provided in Section 2, Appendix B2\_1 of the application.

**Figure 1**  
**Project Management Structure**



All the personnel will be familiar with, and understand the relevant aspects of the Environmental Permit, the Site Operating Plan and its accompanying documentation, and the Company’s Health and Safety Policy.

The Company has an environmental management system and is certified to ISO 14001. This will ensure that a continuing programme of environmental monitoring and improvements are incorporated into all aspects of the Site operations.

All existing and new personnel will undergo training in environmental awareness in relation to this new programme, and this will be updated on a regular basis in accordance with the principles included in the ISO 14001 system.

All new personnel will undergo induction training and will be supervised by an appropriate senior member of staff in respect of the Environmental Permit, the Site Operating Plan and accompanying documentation, and the Company’s Health and Safety Policy.

### 2.3 Changes in Technically Competent Persons

Information on any changes in the technically competent management of the Site will be submitted to the Environment Agency (EA) in writing within 5 working days of the change in management, along with evidence of the required technical competence.

Technically Competent Management and Technical Competence shall be as defined under Section 74 of the Environmental Protection Act 1990 and Regulations 4 and 5 of the 1994 Regulations.



## 2.4 Notification of Waste Handling Operations

### 2.4.1 Commencement of Permitted Waste Management Operations

The management will notify the EA of its intention to commence waste management operations such as the acceptance of waste for restoration, in accordance with the number of days' notice set out in the permit.

### 2.4.2 Cessation and Recommencement of Receiving Wastes

In the event that the Site ceases receiving waste either permanently or for longer than three months, the Company will advise the Agency in writing of the date of the cessation and of the planned date of recommencement. In the event that the Site recommences receiving waste sooner than the notified date, the Company will give the Agency at least five working days' notice in writing.

## 3.0 WASTE QUANTITIES AND TYPES OF WASTE

### 3.1 Waste Quantities

#### 3.1.1 Maximum Capacity of Operation

The total quantity of waste that shall be deposited at the Site shall be limited by the approved waste recovery plan and approved restoration final contours.

#### 3.1.2 Waste Input Rates and Time to Completion of Filling

The proposed waste quantities for acceptance at the Site are shown in Table 1 below.

**Table 1 Proposed Waste Input**

Waste Types	Waste Input Rates
Inert waste as specified in Table 2 below	Up to 550,000m <sup>3</sup>

All wastes coming into the Site will be recorded at the weighbridge.

It is estimated that the operational period of life for the Site will be less than 10 years with a minimum of 2 years aftercare. The sequence of work will be in accordance with the phases of the planning permission and the method statement for the protection and conservation of flora and fauna on the Site submitted in accordance with the planning permission.

### 3.2 Permitted Waste

#### 3.2.1 Soil, Soil Substitute and Aggregate Recycling

The Site will only accept waste material for the restoration of Elton 2 that is suitable for the intended purpose and won't cause pollution. Inert waste will be sourced principally from the excavation sector of the construction market. Typical sources are wastes extracted for construction of foundations, bored pilings etc. and which consists mainly of naturally occurring soils, stones, clay or sandy clay or soils.

The waste types which will be used for the development are detailed in Table 2 below, with their associated European Waste Catalogue (EWC) code.

**Table 2 Acceptable Waste Types for Recovery**

EWC Code	Description
01	WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS
01 04	wastes from physical and chemical processing of non-metalliferous minerals
01 04 08	waste gravel and crushed rocks
01 04 09	waste sand and clays
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 01	concrete, bricks, tiles and ceramics
17 01 01	concrete
17 01 02	bricks
17 01 03	tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	soil and stones
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 09	minerals (for example sand, stones)
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 02	garden and park wastes (including cemetery waste)
20 02 02	soil and stones

Of those listed in Table 2, the waste types in Table 3 are assumed to fulfil the criteria of inert waste and therefore can be accepted without testing provided the waste stream is:

- a single waste type from a single source;
- are well characterised and described; and
- there is no suspicion of contamination.

**Table 3 Waste Types Which Can Be Accepted Without Testing**

EWC Code	Description
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 01	concrete, bricks, tiles and ceramics
17 01 01	concrete
17 01 02	bricks

EWC Code	Description
17 01 03	tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	soil and stones
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
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 02	garden and park wastes (including cemetery waste)
20 02 02	soil and stones

## 4.0 WASTE IDENTIFICATION AND RECEPTION

### 4.1 Waste Acceptance Procedure

The Waste Acceptance Procedure (WAP) will ensure that the Site only accepts waste that is:

- Suitable for the activity;
- Is allowed by the permit; and
- Is appropriately considered by the environmental risk assessment.

### 4.2 Record Keeping Procedures

Records will be maintained of all waste deposited at Elton 2 and will comprise the following.

#### 4.2.1 Waste Transfer Notes

All waste accepted for deposition at the Site will be accompanied by a waste transfer note (unless it is a multiple consignment) as required by the Duty of Care Regulations, which will provide the following details:

- waste description including appropriate waste classification code;
- waste origin;
- transferor and transferee; and
- signatures of transferor and transferee.

#### 4.2.2 Records of Quantity Received

A register of the quantities and characteristics of waste accepted at the Site will be maintained via written records kept at the head office including:

- date of delivery;
- waste quantity;

- waste description and classification code; and
- waste producer and/or carrier.

A record will also be maintained of all waste that is removed from the facility.

### 4.2.3 Waste Information Forms, Waste Rejection Forms and Correspondence

Copies of relevant paperwork and correspondence will be maintained at the Head Office.

### 4.2.4 Waste Characterisation and Analysis Records

Copies of all information relating to the characterisation and analysis of waste accepted at the Site will be maintained as a digital record on IV's Environmental Advisor's computer database.

### 4.2.5 Site Log/Diary

The foregoing records will be supplemented by the Site log/diary which will be used to record further details relating to waste acceptance and rejection including communication with the Environment Agency.

## 5.0 SITE PREPARATION

The proposed phasing of extraction and infilling of the Site is detailed in planning permission and the associated application drawings.

### 5.1 Maintenance of Surface Water Drainage System

Any surface water drainage ditches, culverts etc. will be inspected monthly for signs of erosion, instability, accumulation of sediment or vegetation or blockages. In the event that any deterioration is observed remedial works will be carried out as soon as practicable.

## 6.0 SITE CONSTRUCTION, WASTE DEPOSIT AND PLACEMENT

### 6.1 Site Operations & Engineering

The proposed sequence of operations is as follows:

- A haul road and bailey bridge have been constructed within the material transfer/haul road part of the site which connects the site to the separately permitted processing area;
- Hydraulic excavators have commenced stripping topsoil and subsoil, which is transported by ADT for storage in the processing area;
- The working of the Site will proceed in 3 phases from east to west as illustrated in Drawing 04;
- Dewatering of the Site is not practical given the proximity to the River Nene and high groundwater level. Gravel will be extracted 'wet' from each area and be transported to the adjacent, separately permitted processing and waste storage area for washing;
- Mineral will be extracted down to the clay which underlies the sand and gravel seam. The underlying clay forms a natural geological barrier;
- During extraction of each phase, the clayey overburden will be used to construct an artificial side-wall attenuation barrier against the basal clay;

- Imported inert waste will be transported from the processing and waste storage area, following rigorous waste acceptance checks, and placed directly into water within the void;
- If the environmental permit determination time is excessively long, infilling of the first phase will commence with non-waste consisting of site-won overburden and silt from the mineral washing settlement lagoons;
- Once the imported restoration materials have been placed to the required level, site-derived subsoil and topsoil will be replaced. Subsoil and topsoil will be transported by ADT from stockpiles in the processing area and a low ground pressure dozer will be used to spread the material loosely and avoid any compaction. The finished topsoil thickness will depend on the original amount removed but is expected to be 0.2m on average.

The side-wall attenuation layer (SAL) will be constructed using suitable site derived clay and excavated silt arisings from silt lagoons.

The majority of the SAL material will be placed sub-aqueously. To ensure this occurs in a safe and controlled manner, IV's excavations and tips rules shall be developed to accord with the design and site conditions and will be instigated on Site. These rules will ensure that only essential earth moving plant operate in the vicinity of the active tipping point and plant can enter and exit the active area in a safe manner for the duration of the works. The rules will include, but not be limited to, the following:

- Sands and gravel extraction shall extend the full depth to the underlying clay of the Grantham Formation;
- Site derived clay and silts will be transported and tipped from dump trucks at the edge of the excavated trench following aggregate extraction using a long reach excavator; and
- Materials will be pushed into the water by tracked earth moving plant (dozer or long-reach excavator).

A full operational method statement and risk assessment will be completed prior to commencement of works.

In the event that conventional methods are not practicable to install the SAL, consideration shall be given to installing a slurry trench cut-off wall, e.g., bentonite wall or deep soil mixing

The slurry wall shall be in accordance with the Contractor's design and the performance criteria (a minimum width of 1m is recommended provided that the permeability criteria for a SAL layer is met). The cut-off wall would be keyed into the underlying clay of the Grantham Formation.

## 6.2 Phased Infilling

Infilling will take place within the void to restore the surface according to the restoration contours required by planning permission, using a combination of site-derived materials and suitable imported inert waste. Imported inert restoration material will be screened in the separately permitted mineral and waste processing area to separate any oversize material before placement in the void. Oversize material will be crushed on a campaign-basis using mobile crushing plant before being used as infill on-site.

## 6.3 Aftercare Strategy

There will be an appropriate aftercare period during which remedial work would be undertaken on any areas that required it, e.g. due to settlement or poor drainage.

Annual aftercare meetings will be held with the Planning Authority to review progress on the Site to agree operations and management for the forthcoming year.

Monitoring of the Site will be in accordance with the Site closure plan.

## 7.0 SITE INFRASTRUCTURE

### 7.1 General

The infrastructure on Site will be limited, with only the following being used in the Waste Recovery Operation:

- Mobile plant machinery including hydraulic excavator, articulated dump trucks, a dozer and loading shovels;

The Waste Operation area to the north will comprise of the following equipment:

- Mobile processing plant;
- Wheel cleaner;
- Mess room;
- Fuelling area;
- Car Park; and
- Weighbridge, ticket office and Site office area.

### 7.2 Site Access, Internal Haul Roads

The Site will be accessed at the eastern corner of the Site from Waste Operations Area.

Daily traffic movements will vary depending on the phase of operations the Site is undergoing. Daily movements include movements associated with the imported materials for reclamation, removal of mineral and recycled materials for the Site.

Internal haul roads will be constructed from screened hardcore and will be lifted and re-used as the project progresses.

### 7.3 Site Identification Board

A notice board is erected at the Site entrance. The notice board is constructed from durable materials and displays the following details:

- Name and address of the waste management facility;
- Statement that the Site is permitted by the Environment Agency;
- Name, address and telephone number of the permit holder;
- The Environment Agency's national numbers for general enquiries and emergencies;
- The emergency contact and telephone number of the licence holder;
- The opening hours of the Site;
- Permit reference number.

#### 7.3.1 Maintenance

The notice board will be inspected on a weekly basis and checked for integrity and accuracy of the information. Repairs/alterations will be carried out as soon as possible after any defect is noted.

## 7.4 Site Setting and Fencing

Risk assessments will be carried out and appropriate measures will be taken to ensure that public safety and the safety of the company's assets are safeguarded.

When operations are taking place, security guards will be in attendance and also outside of normal working hours if necessary.

Once per week all boundary fencing will be inspected, and any necessary repairs put in hand. Any damage that exposes members of the public to significant risk or that allows unauthorised vehicular access to the Site will be made good with a temporary repair until a permanent repair can be made.

A note will be made in the Site Diary of when the inspections are carried out, and a record will be made of any damage discovered and the remedial action taken.

At the end of each working day the Site will be checked to ensure it is secure (i.e. all gates and buildings are locked).

All mobile plant will be parked securely when not in use and at the end of each working day in the adjoining, separately permitted processing and waste storage area.

## 7.5 Site Office

The Site office will be located in the separately permitted processing and waste storage area adjoining the Site and will contain relevant documentation for the Site operations e.g. a copy of the Environmental Permit and associated documents, Site plans, emergency procedures etc.

## 7.6 Fuel Storage

No fuel will be stored within the permitted area.

## 7.7 Control of Mud and Debris

The Site will utilise dust control equipment available from the Waste Operations Area when required, including a water bowser.

Regular daily checks will be made by the Site supervisor, or nominated Site employee, of the state of the surface of the Site roads.

## 7.8 Public and Private Utilities

There are no utilities crossing the Site.

## 7.9 Site Plant, Equipment and Vehicles

The main machinery employed on Site will be CAT D6s or similar bulldozers, articulated dump trucks, hydraulic excavator and loading shovel.

A water bowser will be available on Site for dust control, which is pulled by a Ford tractor from the Waste Operations Area.

## 7.10 Visitors

Unauthorised persons are not allowed on company premises.

Visitors must call at the Site office located in the adjoining Mineral Processing & Waste Operations Area, identify themselves and state the nature of their business. Unless the caller is known he/she MUST NOT be allowed to find their destination unaccompanied.

## 7.11 Report of Thefts

Any staff must immediately inform the Site supervisor or nominee of any occurrence of:

- Breaking and entering of company premises;
- Vandalism;
- Theft from company premises;
- Any act or suspected act of dishonesty; and
- Stock or cash deficiencies.

## 8.0 ENVIRONMENTAL NUISANCE CONTROL

The Company has an approved BS EN ISO 14001.

This system ensures that management techniques are instigated to ensure compliance with all planning permissions, Waste Management Licenses, Environmental Permits and other legal requirements. The company has committed itself to a programme of environmental improvements.

The following sections deal with particular potential environmental problems.

### 8.1 Control of Litter

As the Site will only be taking construction waste, there should not be a litter problem as the wastes are of a heavy nature, not generally capable of generating windblown litter. Any unauthorised paper etc., delivered with a load would be placed in the skip provided at the tipping area, which would be sheeted.

### 8.2 Control of Odour

The Site is only permitted to accept inert waste and therefore it is unlikely that there will be an odour problem from the construction material delivered to the Site.

### 8.3 Control of Dust

#### 8.3.1 Prevention and Control of Releases of Dust, Fibres and Particulates

Dust, fibres and particulates may be found in the construction materials with a fines content and in soils. They may be generated during periods of dry weather in combination with windy conditions.

The Dust Management Plan (DMP) will be followed to reduce the risk of dust generation and movement at source. Dust may arise from on-Site transportation on internal haul roads, infilling and contouring of waste and during the restoration phase on Site.

A number of measures will be implemented and maintained throughout the operational life of the Site as listed in the DMP and summarised in the sections below. The objective of these measures will be to prevent and minimise the release of airborne dusts, fibres and particulates arising from the permitted waste management operations in such quantities or concentrations that are likely to cause pollution of the environment or harm to human health.



### 8.3.2 Control Measures During Handling & Transportation of Waste

The following control measures will be implemented during all periods when the Site is operational:

- Most areas will be worked wet, however when necessary, working areas will be sprayed with water via a bowser.
- In unusually dry/windy conditions site activities will be suspended if it appears likely dust may be carried towards sensitive receptors.
- Internal haulage will be restricted to clearly delineated surfaces, on a prepared surface at low level where possible.
- A water bowser will be available to suppress dust emissions.
- All site vehicles will be maintained in accordance with the manufacturer's manual.
- Vehicle exhausts will be pointed upwards.
- The Site will benefit from good housekeeping including the regular sweeping of road surfaces.
- Site haulage will follow site speed limits to minimise the mobilisation of dust particles.
- All drivers, including visitors, will be made aware of the Site's commitment to minimising dust.
- The Site supervisor will be responsible for checking the situation with regard to dust on a regular basis throughout working hours, and for ensuring that mitigating measures are provided as necessary.
- HGVs transporting dusty materials will be sheeted.

### 8.3.3 Management Procedures

The Site Supervisor, or their nominee, will exercise day to day control on Site at all times. They will have particular responsibility for ensuring full compliance with the conditions attached to the permit. Specifically, they will assume control either personally or by delegation to suitably trained and responsible staff of:

- Vehicle movements;
- All loading, tipping and materials handling operations;
- Operation of dust suppression measures; and
- Inspection, cleaning and maintenance of all plant and equipment.

Staff at all levels will receive the necessary training and instruction in their duties relating to the control of all operations and the potential sources of dust emissions. Particular emphasis will be given to dealing with plant malfunctions and abnormal conditions. Site staff will inform the manager whenever visible dust emissions are observed or appear likely to occur, as a result of any Site operation.

If at any time dust emissions likely to cause a nuisance beyond the Site boundary are detected by the Site staff or any complaints relating to dust is received, the incident will be recorded in the Site Diary, and immediate action taken to identify the cause of the problem.

If the problem is related to a specific type of waste, then action will immediately be taken to suppress any aerial emissions by damping down or covering the waste with non-dusty materials.

The continuing effectiveness of this dust management scheme will be reviewed regularly.

### 8.3.4 Complaints Procedure

A complaints procedure will be established to ensure that any nuisance being caused to local residents is dealt with effectively. A register of complaints will be kept in the associated Waste Operations Area as to record all concerns made either directly to the Site manager or via the regulatory authorities.

Each complaint will be investigated. The Site Supervisor will report the findings and the action taken to the Site Manager. The EA and Minerals Planning Authority will be advised in writing within two weeks of any dust complaint together with the findings of the investigation and any corrective action taken.

## 8.4 Noise Control

A Noise Assessment has been completed for the Site and is provided in Section 12 of the permit application. Section 6 of this details Noise Monitoring and Control Measures which will be in place on Site to ensure noise emissions are managed to an appropriate level. These include:

- Ensuring all plant is kept well maintained;
- Ensuring silencers on plant are effective;
- Turning off plant when not in use;
- Using alternative non-tonal reversing signals on mobile plant; and
- Implementing and enforcing a Site speed limit.

## 8.5 Control of Pests and Vermin

The inert waste to be placed at the Site will not attract pests and vermin e.g. flies and birds. Nevertheless, the Site Supervisor will undertake regular inspection of the working areas and surrounding areas to check for signs of infestation, and if necessary, will instigate measures to control the infestation.

The results of these inspection will be recorded in the Site Diary.

## 8.6 Potentially Polluting Spillages and Leaks

### 8.6.1 Potentially Polluting Spillages and Leaks of Waste

Potentially polluting wastes will not be accepted at the Site, therefore control measures and action plans are not considered necessary.

### 8.6.2 Potentially Polluting Spillages and Leaks of Raw Materials

#### Fuels and Oils

No fuels, oils or other liquids will be stored within the permitted area.

Spill kits will be kept on Site to deal with any minor spillages that occur. All staff on Site will be trained in the use of these kits.

Should a spillage occur on the Site, the affected area will be excavated and removed for disposal at an appropriately licensed facility.

## 8.7 Fires on Site

No wastes will be burned on Site.

The types of waste which will be transferred to the Site are not likely to give rise to fires or heating, therefore no specific control measures or action plan are required.

There are no office or accommodation areas located within the permitted area.

All mobile plant will carry a fire extinguisher and will be inspected and maintained in accordance with the plant maintenance schedule to mitigate against potential fires. When not in use, plant is stored outside the permitted area on the adjoining mineral and waste processing site.

## 9.0 SITE RECORDS

### 9.1 Security of Records

The Company appreciate that accurate and reliable record keeping procedures are a vital part of a modern restoration operation. All records that are required to be made under the conditions of the Permit and the Site Operating Plan will be maintained and kept secure from loss, damage or deterioration as detailed in the following sections.

### 9.2 Written Records

The following records and documents will be available for inspection at the associated Waste Operation Area Site office:

- Visitors Book;
- Site Diary;
- Environmental Permit;
- Site Operating Plan;
- Site Monitoring Plan;
- Company Daily Landfill Inspection Reports;
- Copies of all Environment Agency visit or inspection reports;
- Company Safety Policy; and
- Emergency Procedures.

The following documentation will be available for inspection at the company's head office in Harlow:

- Daily Waste Input Forms;
- Waste Transfer and Acceptance Documentation – i.e. Duty of Care Transfer Notes, conveyance notes and weighbridge tickets;
- Site Environmental Monitoring Data reports;
- Random Waste Sampling Forms;
- Random Waste Sampling Analytical Results;
- Waste Information Forms;
- Unacceptable Waste Analysis Forms; and
- Rejected Waste Forms.

### 9.3 Digital Records

The following records will be maintained in digital format on the Company's environmental advisor's computer database, copies of which will be sent quarterly to the Company for storage on their computer system:

- Random waste sampling analysis records.

Monitoring data will be sent to the EA in digital format by the Company's environmental advisor.

### 9.4 Availability of Records

All records which are required to be made under the conditions of the permit will be made available for immediate inspection when required by an authorised officer of the Environment Agency.

A noticeboard will be maintained in the associated Waste Operation Area office with up-to-date versions of the following prominently displayed:

- Environmental Permit with conditions;
- Plan of method and direction of working;
- Certificate of Employers Liability Insurance;
- Emergency Telephone Numbers;
- The Company's Conditions for Acceptance of Waste (Printed copies will be available for issue should these be required); and
- The Company's Site Safety Rules for customers/visitors (Printed copies will be available for issue should these be required);

Site diary records will be kept for a minimum period of two years.

Environmental Monitoring records will be kept until a certificate of completion is issued for the Site.

### 9.5 Recording Hazardous Waste Deposits

No hazardous waste will be deposited at the Site therefore records are not required.

### 9.6 Records of Waste Movements

Waste destined for the recovery operation is received in the processing and waste storage area, which is operated under a separate permit. All incoming material undergoes waste acceptance checks including documentation, visual inspection and where necessary treatment, before being stockpiled for use as restoration infill. Records of waste received at the adjoining mineral processing and waste storage area will be collected as follows:

A record will be kept of each cargo of waste accepted which will include the following details:

- The nature of the waste;
- Waste Type;
- Quantity – tonnes;
- Date received; and
- Origin of waste, in terms of place.

A summary of the waste accepted for restoration at the Site will be made for each quarter of the financial year and will be submitted to the EA within one month following the end of the quarter. The format of the summary record will be agreed with the Agency.

## 9.7 Site Diary

A Site Diary will be maintained by the Site supervisor and will be kept secure. The Site Diary will be available for inspection when required by an authorised officer of the Environment Agency.

The diary will include a record of the following:

- Plant breakdowns and course of action to provide necessary replacement plant;
- Plant maintenance;
- Adverse weather conditions;
- Dust conditions;
- Noise conditions;
- Commencement of working or filling in a new area;
- Completion of working in specified area;
- Soil-stripping;
- Soil-replacement;
- Emergencies and actions taken;
- Unauthorised waste receipts and actions taken;
- Sampling or monitoring exercises;
- Site inspections by company staff, problems identified, and actions taken to resolve them; and
- Complaints received and actions taken.

## 9.8 Daily Inspection Checklist

To assist in the completion of the Site Diary, the Site supervisor will refer to the “Daily Inspection Check List”. The daily inspection may consist of the following:

- All Site plant is operating and maintained according to schedule;
- Dust observations have been carried out;
- Any high environmental monitoring readings have been reported;
- The water bowser and tractor are in use for dust suppression if necessary;
- If litter is a problem;
- The surface water drainage system is available, and functioning should it be necessary at times of high rainfall;
- The standard of haul roads and whether any repairs are required;
- Cleanliness of access road;
- Cleanliness of Site office and surrounds;

- Conditions of signs and notice boards;
- Damage to fences and gates;
- Any fly tipping;
- Stability of slopes around the Site, sand faces, waste faces etc.;
- Odours;
- Signs of discoloration of surface water;
- Vandalism; and
- Completion of the Site Diary.

## 9.9 Reporting of Environmental Performance

The Company will prepare a review of the environmental monitoring data every year during the operational life of the Site and during the post closure phase and will undertake a review of the Hydrogeological Risk Assessment every six years. The reports will be submitted to the EA at intervals required in the permit, or as otherwise agreed with the EA.

A completion report will be prepared at the end of the Site completion phase.

The report will include the following information:

- An analysis and review of the environmental monitoring results recorded for the Site, with an interpretation of the results against background and trigger levels.
- A review of the risk management systems provided for the Site.

## 9.10 COTC Holder Visits

The named COTC holder will visit Site at least twice/week or such other frequency as may be agreed with the EA. A visit report will be placed in the Site file for each visit.

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