

ENVIRONMENTAL MANAGEMENT SYSTEM

A2B House, Orwell Crossing, Nacton, Ipswich, IP10 0DD

A2B-Online Limited

Version:	1.0	Date:	07 March 2025		
Doc. Ref:	ORW-3301-A	Author(s):	EG	Checked:	CP
Client No:	3301	Job No:	001		



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Waste, Planning & Environmental Consultants



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REGISTERED IN THE UK | COMPANY NO. 4850754

Document History:

Version	Issue date	Author	Checked	Description
1.0	07/03/2025	EG	CP	Application copy

CONTENTS

DOCUMENT HISTORY:	I
CONTENTS	II
LIST OF TABLES	V
LIST OF APPENDICES:	VI
SITE INFORMATION & KEY CONTACTS LIST	VII
1 INTRODUCTION	8
1.1 GENERAL	8
1.2 RELEVANT CONTACTS	9
1.3 SITE LOCATION	9
1.4 WASTE OPERATIONS	11
1.5 HOURS OF OPERATION	11
1.6 STAFFING AND MANAGEMENT	12
1.7 TECHNICALLY COMPETENT MANAGER (TCM)	12
1.8 HEALTH AND SAFETY	12
1.9 CONVICTIONS	13
1.10 WASTE CARRIERS LICENCE	13
2 SITE ENGINEERING AND INFRASTRUCTURE	14
2.1 SITE DESCRIPTION	14
2.2 ACCESS AND PARKING	14
2.3 SITE OFFICE	14
2.4 WEIGHING AND CATEGORISING LOADS	15
2.5 NOTICE BOARD AND SIGNS	15
2.6 SITE SECURITY	16
2.7 FUEL AND HAZARDOUS SUBSTANCE STORAGE	17
2.8 REJECTED WASTE	17
2.9 DRAINAGE	17
3 SITE OPERATIONS	19
3.1 PRELIMINARY PROCEDURES	19
3.2 CHECKING IN & INSPECTION OF LOADS	20
3.3 WM3 - WASTE CLASSIFICATION ASSESSMENT	21
3.4 GYPSUM & PLASTERBOARD ASSESSMENT	21
3.5 WASTE DEPOSIT & HANDLING	21
3.6 WASTE TREATMENT	21
3.7 WASTE TYPES AND QUANTITIES	22
3.8 WASTE STORAGE	22
3.9 CONVERSION FACTORS	23
3.10 WASTE REMOVAL AND EXPORT	24

3.11	RECORD KEEPING	24
3.12	MANAGEMENT TECHNIQUES.....	27
3.13	SITE CLOSURE PLAN	28
4	ENVIRONMENTAL CONTROL, MONITORING AND REPORTING.....	29
4.1	BREAKDOWNS AND SPILLAGES	29
4.2	SITE INSPECTIONS AND MAINTENANCE.....	29
4.3	CONTROL OF MUD AND DEBRIS.....	30
4.4	DUST CONTROL.....	31
4.5	ODOUR CONTROL.....	31
4.6	LITTER CONTROL.....	31
4.7	CONTROL OF PESTS, BIRDS AND OTHER SCAVENGERS	31
4.8	CONTROL AND MONITORING OF NOISE & VIBRATION.....	32
4.9	COMPLAINTS PROCEDURE	32
5	EMERGENCY, ACCIDENT MANAGEMENT & CONTINGENCY PROCEDURES.....	33
5.1	GENERAL	33
5.2	FIRE	34
5.3	BREAKDOWNS.....	35
5.4	SPILLAGES	35
5.5	DRUMS.....	36
5.6	ADVERSE REACTIONS.....	36
5.7	STAFF SHORTAGES	37
5.8	CLOSURE OF DESTINATION SITES.....	37
5.9	OPERATIONAL FAILURE	37
5.10	BOMB SCARE	37
6	WEATHER CONDITIONS & ADAPTING TO CLIMATE CHANGE.....	38
6.1	WEATHER CONDITIONS.....	38
6.2	FLOOD RISK	40
6.3	HIGH TEMPERATURES AND HEATWAVES.....	40
6.4	AVAILABILITY OF WATER	41
6.5	CONCLUSION	41
7	TRAINING FOR SITE STAFF	42
7.1	TRAINING NEEDS ASSESSMENT	42
7.2	SITE RULES AND INFRASTRUCTURE TRAINING.....	42
7.3	EMERGENCY PROCEDURES TRAINING.....	42
7.4	FIRE SAFETY / FIREFIGHTING TRAINING	43
7.5	RECOGNITION OF WASTE TYPES TRAINING.....	43
7.6	STORAGE AREAS / LIMITS TRAINING	44
7.7	VEHICLE / PLANT PREVENTATIVE MAINTENANCE TRAINING.....	44
7.8	DUTY OF CARE TRAINING	44

7.9	PERMIT / MANAGEMENT SYSTEM TRAINING	45
7.10	TRAINING FOR CONTRACTORS	45

List of Tables

Table 1.1 - Sensitive Receptors.....	10
Table 1.2 - Staffing Levels	12
Table 2.1 - Weight Volume Conversion Factors.....	15
Table 3.1 – Storage Table Details.....	23
Table 3.2 – Conversion Factors.....	23
Table 4.1 - Noise Management Table.....	32

List of Appendices:

Appendix I - Drawings

Drawing No. ORW/3301/01 – Site Location Map

Drawing No. ORW/3301/02 – Permit Boundary Plan

Drawing No. ORW/3301/03 – Site Layout & Fire Plan

Drawing No. ORW/3301/01 – Site Location Map

Appendix II - Record Keeping Forms & Procedures

ORW/RF/2 - Rejected Waste

ORW/RF/4 - Site Diary/Inspection Form

ORW/RF/6 - Employee Training Needs Assessment / Review

ORW/RF/7 - Complaints Form

Appendix III - Copy of Issued Environmental Permit

Appendix IV - Health & Safety – Conditions of Site Use

FOR REFERENCE ONLY; OPERATOR MAY USE INTERNAL INSPECTION SHEETS OR THE FORMS WILL BE KEPT IN ELECTRONIC FORMAT

Site Information & Key Contacts List

Site Address:	A2B House, Orwell Crossing, Nacton, Ipswich, IP10 0DD		
Site Operator:	A2B-Online Limited	National Grid Ref:	TM 21173 41324

Contact	Description	Office Hours	Out of Hours
Marinus Scheijde	Director	01394 458530	07765 924896
Paul Caruana	TCM	01352 878471	07436 189610
<u>Ipswich Hospital</u> Heath Road, Ipswich, IP4 5PD	Main NHS Hospital	01473 712233	999
	Accident & Emergency (A&E) – 12-hour service	01473 712233	999
<u>Ravenswood Medical Practice</u> 24 Hening Avenue, Ipswich, IP3 9QJ	Local Doctor Surgery (GP)	01473 271122	999
<u>Suffolk Constabulary</u> Suffolk Constabulary Police Headquarters, Portal Avenue, Martlesham Heath, Martlesham, Ipswich, IP5 3QS	Local Police Non-Emergency	101 or 01473 613500	999
	Police Emergency	999 or 112	999
<u>Suffolk Fire & Rescue Service – Ipswich East Fire Station</u> 17 The Havens, Ipswich, IP3 9SJ	Fire and Rescue Service (in Emergency Dial 999)	999 or 01473 260588	999
<u>Suffolk County Council</u> Landmark House, 4 Egerton Road, Ipswich, IP1 5PB	County Council General Enquiries	0345 606 6067	01473 260588
<u>Anglian Water</u>	Water Provider / Sewerage Undertaker	03457 919 155	03457 145 145
Environment Agency Ceres house, Searby Rd, Lincoln LN2 4DW	Local Environment Agency Office	0370 850 6506	0800 80 70 60
Oaktree Environmental Ltd Lime House, 2 Road Two, Winsford, Cheshire CW7 3QZ	Specialist Advisor (Waste Permitting and Planning Issues)	01606 558833	N/A

1 Introduction

1.1 General

- 1.1.1 Oaktree Environmental Ltd have been instructed by A2B-Online Limited (the Operator) to prepare this Environmental Management System (EMS).
- 1.1.2 This EMS has been prepared in relation to waste operations undertaken at A2B House, Orwell Crossing, Nacton, Ipswich, IP10 0DD. The site is operated as a non-hazardous waste transfer station comprising the acceptance, storage and transfer of predominantly SDF / RDF bales for export. The operator may also store bales of other household, commercial and industrial (HCI) waste types such as paper/cardboard, plastic, ferrous/non-ferrous metals etc.
- 1.1.3 The permit boundary for the site is outlined in green on Drawing No. ORW/3301/02. All referenced to 'the site' in this EMS shall mean this area and the associated infrastructure, plant and equipment.
- 1.1.4 This EMS has been prepared in accordance with the following guidance:
- a) The Environmental Permitting (England and Wales) Regulations 2016.
 - b) Develop a management system: environmental permits.
 - c) Technical Guidance WM3: Waste Classification - Guidance on the classification and assessment of waste.
 - d) The Waste duty of care: code of practice – 2018.
 - e) Non-hazardous and inert waste: appropriate measures for permitted facilities published 12/07/2021.
 - f) Climate change: risk assessment and adaption planning in your management system.

1.2 Relevant Contacts

1.2.1 The contact details for the Operator are as follows:

A2B-Online Limited	Contact: Marinus Scheijde
A2B House,	Position: Director
Orwell Crossing,	Tel: 01352 878470
Nacton,	E-mail:
IP10 0DD	

1.2.2 Contact details for Oaktree Environmental Ltd who act as the Operators Environmental Consultant are as follows:

Oaktree Environmental Ltd	Contact: Emma Gibson
Lime House	Position: Consultant
2 Road Two	Tel: 01606 558833
Winsford	E-mail: emma@oaktree-environmental.co.uk
Cheshire CW7 3QZ	

1.2.3 A full list of relevant contacts including emergency contact numbers is kept on site at all times and are provided in the Site Information & Key Contacts List section in the pre-pages of this document.

1.3 Site Location

1.3.1 The site is located at A2B House, Orwell Crossing, Nacton, Ipswich, IP10 0DD as shown on Drawing Nos. ORW/3301/01 & 02. The national grid reference for the site is TM 21173 41324 and can be accessed via the A14.

1.3.2 The site is situated within a predominantly industrial area with other commercial / industrial properties immediately surrounding the site. A full list of receptors within 1km of the site have been included in Table 1.1. overleaf. A Receptor Plan illustrating these receptors has also been prepared, see Appendix I, Drawing No. ORW/3301/04.

Table 1.1 - Sensitive Receptors

Receptor	Direction from Site	Approx distance from the site boundary to the receptor boundary (m)
Commercial / Industrial		
Ransomes Industrial Estate	West	0
Orwell Logistics Park	East	0
CP Transportation Services Limited	South	0
Lytham Road Waste Transfer Station (operated by FCC)	West	15
Basetek (mechanical engineering)	Northwest	40
Fryers Transport	Northwest	135
Clip 'n Climb Ipswich – Indoor Rock-Climbing Centre	West	230
Drax Energy Solution Ltd	West	270
Ipswich East Fire Station	West	310
Residential		
Residential properties (Felixstowe Road)	North	370
Residential properties (Penny Lane)	Northwest	755
Residential properties (Mill Piece)	Southeast	940
Care homes (residential)		
n/a	n/a	n/a
Schools		
n/a	n/a	n/a
Watercourses		
n/a	n/a	n/a
Infrastructure (major roads and transport links)		
A14 and its users	South	65
Felixstowe Road (A1156)	North	360
Ecological Sites		
Priority habitat (Deciduous Woodland)	West	110

1.4 Waste Operations

- 1.4.1 The Environmental Permit (EP) is required for the storage (keeping) and transfer of waste only. The operator predominantly accepts RDF/SDF bales but may also accept bales of HCl waste such as paper/cardboard, plastic, ferrous/non-ferrous metals etc. for export, there is no treatment of any waste undertaken on site.
- 1.4.2 Specified waste management operations include waste disposal and waste recovery operations listed Annex IIA and IIB of The Waste Framework Directive 2008/98/EC are shown below:
- R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).
 - D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced).

1.5 Hours of Operation

- 1.5.1 The site will be operated on a 24/7 basis for the receiving / removal of waste from site, however, waste is typically accepted Monday to Friday. 24/7 operation is necessary due to the vessel departure times from the dock.
- 1.5.2 The manned office hours for the site are typically between 7am-7pm Monday to Friday.
- 1.5.3 During times where the site is closed or not in operation, the site will be locked and secured to prevent unauthorised vehicular or pedestrian access. If loads are being delivered / removed from site outside of the manned office hours, drivers are provided with a code for the keypad used to gain access the site.

1.6 Staffing and Management

- 1.6.1 The site will be open for the deposit / removal of waste during the hours listed in section 1.5 on the pre-pages of this document. Table 1.2 details the staff structure of the site when operating at full capacity.
- 1.6.2 The roles included in Table 1.2 below are used throughout the EMS to demonstrate the responsibilities for each staff member.

Table 1.2 - Staffing Levels

Position	Employees	Responsibilities
Site manager & TCM	1	Overseeing and co-ordinating all activities which take place at the site
Office / administrative staff	13	Office/administrative duties

1.7 Technically Competent Manager (TCM)

- 1.7.1 The TCM is required to attend site for the time agreed with the Environment Agency. Attendance requirements for the TCM must be met on a weekly basis.
- 1.7.2 A record of the TCM attendance, including start and finish times will be recorded in the site diary. These records will be made available to the Environment Agency for inspection on request.
- 1.7.3 The Operator will ensure in the absence of the TCM a nominated person will take on the TCM responsibilities and act as the competent person. The Environment Agency will be informed of any changes to the TCM and relevant replacement details.

1.8 Health and Safety

- 1.8.1 All operations on site will be carried out in accordance with the relevant requirements of the Health and Safety at Work Act 1974. Conditions of site use for employees, visitors and contractors are shown in Appendix IV. These conditions will be shown to all site users and

must be signed prior to using the site. Anyone refusing to comply with the conditions of use will be asked to leave the site.

1.9 Convictions

- 1.9.1 At the time of writing this EMS, A2B-Online Limited nor any of the relevant people within the company have been convicted of a relevant offence.

1.10 Waste Carriers Licence

- 1.10.1 The Operator hold an upper tier waste carries licence to allow the transportation including, importing and removal of waste from the site by the Operators own vehicles. The Operators waste carrier's registration number is CBDU190299.

2 Site Engineering and Infrastructure

2.1 Site description

2.1.1 The site infrastructure is clearly detailed on Drawing No. ORW/3301/03. The drawing illustrates the following areas on site:

- i) Site surfacing i.e. impermeable concrete, hardstanding etc
- ii) Drainage infrastructure
- iii) Height/type of perimeter fencing
- iv) Reception and storage areas for waste

2.2 Access and parking

2.2.1 Access and egress to/from the site is via Lytham Road as shown on Drawing No. ORW/3301/03. Ample parking is available for staff and visitors on site.

2.3 Site Office

2.3.1 The site office is located as shown on Drawing No. ORW/3301/03, copies of the documents listed below will be retained in the site office and made available at all times.

Documents to be retained in site office
The Environmental Permit (original & any subsequent variations) This Environmental Management System / EAWML (EA agreed document) Current site diary (to record all inspections/visitors to the site) Environment Agency inspection (CAR) forms In-house inspection sheets/recording forms Duty of care transfer notes (for 2 years minimum) Duty of care product notes [(aggregates/topsoil (for 2 years minimum))] Hazardous waste consignment notes (rejected waste, etc., kept for 3 years) Waste delivery tickets Accident book (& 1st aid kit)

2.4 Weighing and Categorising Loads

- 2.4.1 There is no weighbridge located on site, the weight of each load coming into/out of the site will be calculated using the standard EA/WRAP agreed volume-to-weight conversion factors. The conversion factors for the most typical waste types accepted at the site are outlined in below.

Table 2.1 - Weight Volume Conversion Factors

Waste Type	Conversion factors
	Tonnes/m ³
RDF/SDF	0.37
Paper/cardboard	0.20
Plastic	0.28
Metals	0.42

2.5 Notice board and signs

- 2.5.1 A notice board is erected at the site entrance and displays the following information:
- a) The site name and address.
 - b) The name of the permit holder and operator.
 - c) The Environmental Permit number and accompanying statement stating that the site is permitted by the Environment Agency.
 - d) Environment Agency contact details, Emergency No. 0800 80 70 60 and
 - e) General Enquires No. 03708 506 506.
 - f) Operator's "out of hours" emergency contact details
 - g) Operating hours.
- 2.5.2 Additional signs are displayed around the site for operational / health & safety purposes. All staff and visitors will be required to comply with the requirements of all signs whilst on site.

2.6 Site Security

- 2.6.1 Site security is important to reduce the likelihood of unauthorised access to the site. The only access to the site is via Lytham Road.
- 2.6.2 The site is located within Ransomes Industrial Estate who have their own wider security that perform overnight patrols which the Operator pay a service charge to.
- 2.6.3 The site itself is bounded by 2m high steel palisade fencing on all sides, the entrance to the site is secured with an automated cantilever sliding gate. If deliveries are required to be delivered / collected overnight outside of the manned office hours, drivers will be given a security code for the access keypad to provide secure entry to the site and prohibit any unauthorised access.
- 2.6.4 In addition to the above, there is 24-hour CCTV on site which is remotely accessible by all senior members of staff via mobile phones which will send alerts of any movement detected. Camera locations are shown on Drawing No. ORW/3301/03. CCTV provides coverage of the whole site including all waste storage areas providing easy recognition of a fire if one were to occur.
- 2.6.5 In the unlikely event an area of the site becomes obscured and is not visible by CCTV, the operator will install additional CCTV cameras along the site perimeter.
- 2.6.6 In terms of out-of-hours monitoring, CCTV cameras link to senior managements mobile devices and an incident will directly inform the Operator with a notification so senior management can review the footage on their phone and decide whether action is required i.e. attend the site or contact the FRS/EA. Any unusual or suspicious activity picked up which could present the risk of arson and is not in line with the Operators site specific procedures will mean a call to the emergency services.
- 2.6.7 As stated in paragraph 2.6.2 above, the Operator pay a service fee to the wider Ransomes Industrial Estate security guard who will periodically patrol the industrial estate including the site outside of manned office hours.

- 2.6.8 The site security measures will be inspected on a weekly basis and any defects which impair the effectiveness of the security will be repaired to the same or better standard as soon as practicable. All repairs will be noted on the site diary within 24 hours of the event.
- 2.6.9 If unauthorised access becomes apparent as a problem at the site the security measures will be reviewed and improvements implemented.

2.7 Fuel and Hazardous Substance Storage

- 2.7.1 No gas cylinders or aerosols will be accepted for storage at the site, nor will there be any chemicals present on site.
- 2.7.2 No fuel or oil is stored on site.
- 2.7.3 Ad Blue is stored on site for HGV / vehicle maintenance.

2.8 Rejected Waste

- 2.8.1 Loads are examined at the point of collection, if any bales appear to be damaged, they will not be collected for storage at the site. Due to loads being examined at the point of collection it is considered there is a very low potential for loads to be rejected upon arrival to the site. Any rejected bales will be immediately removed from site.

2.9 Drainage

- 2.9.1 All areas of the site used to store waste comprises of an impermeable concrete surface with sealed drainage system. Surface water on waste storage areas of the site drain into a full retention interceptor prior to discharge to foul sewer.
- 2.9.2 The site generally falls to the centre of the site / site access where the interceptor is positioned. The waste storage area is kerbed with 0.3m high concrete kerbs. The above is illustrated on Drawing No. ORW/3301/03.

- 2.9.3 The site will inspect the volume of the interceptor periodically and more frequently during heavy rainfall events.
- 2.9.4 Inspection of the surface water on site will be carried out throughout the day using inspection forms by site staff and in the event of surface water pooling from heavy rainfall events, the Operator will inspect the water by eye and any distinctive colouring from either oil or potentially contaminated wastes will be pumped out using a hired in tanker.

3 Site Operations

3.1 Preliminary procedures

- 3.1.1 Guidance will be given by site management to all employees, sub-contractors, other waste carriers and customers regarding the waste types and operations which are acceptable at the site i.e. a copy of the relevant authorisations for the site such as the Environmental Permit.
- 3.1.2 The operator is a registered waste carrier and generally collect loads from customer sites. However, if waste is to be accepted from sub-contractors or is delivered by other known hauliers, waste carrier registration details will be taken prior to acceptance of a load.
- 3.1.3 All regular haulage operators delivering waste to the site will be periodically checked with the EA public register to ensure appropriate registration.
- 3.1.4 The procedures below would be followed prior to the receipt of waste on site.
- 3.1.5 When a driver employed by the permit holder arrives at the waste producer's premises, he/she will inspect the load for conformity with relevant regulations and safety procedures.
- i) If the load is satisfactory the driver will sign the relevant paperwork (Duty of Care transfer note/delivery ticket) and remove the load from the premises.
 - ii) If the waste does not meet the description stated on the controlled waste transfer note the customer is advised to check the note and give a more detailed description of the waste.
 - iii) If the more detailed description of the waste reveals that the waste is not permitted at the transfer station then the customer is advised that the waste must be taken to another site which is appropriately permitted to accept the waste(s).
- 3.1.6 Integrity of RDF bales will be checked upon collection from the producer site. Bales will be checked to ensure they are wrapped securely and free from defects e.g., no tears or holes

in the bale that could lead to waste material escaping. These checks on site significantly reduces the potential for loads to be rejected upon arrival at the site.

- 3.1.7 If further instructions are needed the driver may also report back to the site manager.

3.2 Checking In & Inspection of Loads

- 3.2.1 All incoming vehicles are required to report to the site office. Details of the load will be recorded, and the transfer note / accompanying documentation will be further checked to ensure it is acceptable at the site. Transfer notes are checked to ensure they contain the following information:

- a) Vehicle Registration and drivers name and signature.
- b) Waste haulier name and valid waste carriers' registration number.
- c) Name address (of source site) and signature of transferor.
- d) Name, address (of destination site) and signature of the person receiving the waste (transferee).
- e) Permit number or exemption reference of person receiving the waste (if applicable).
- f) Description of waste including waste type, waste source, waste containment and waste quantity.
- g) List of Waste (LoW) code.
- h) SIC code of the waste holder.
- i) Date and time of waste transfer and waste transfer note number.
- j) Confirmation that the waste hierarchy has been considered.

- 3.2.2 As stated in section 2.4 the weight of loads will be calculated using the EA/WRAP agreed volume-to-weight conversion factors for loads where the weight is not known upon receipt at the site. As outlined in section xx each bale measures 1.1m (W) x 1.4m (L) and 1.1m (H), measuring 1.54m² and a volume 1.694m³. Each bale weighs approximately 1.2 tonne. Any deviation from these procedures or problems with any loads will be reported to the site manager.

- 3.2.3 Once a load has been accepted the driver will be asked to open the curtain side trailer and a visual inspection of the contents will be carried out to ensure that the material complies with the permit. If non-compliant waste is discovered, the load will not be accepted and disposed of at an approved facility. In cases where the presence of unauthorised waste is likely to lead to a breach of permit conditions, the EA will be contacted immediately to agree a course of action.
- 3.2.4 If hazardous waste or suspected hazardous waste is discovered on site, the material will be isolated with precautions taken to absorb any spillages and the area cordoned off. The EA will be contacted as a matter of urgency and the material left in situ until removed under the EA's instruction.

3.3 WM3 - Waste Classification Assessment

- 3.3.1 The site is not expected to receive any loads from construction sites given there are no 17 EWC codes proposed to be accepted under the permit so there is a negligible risk of receiving any wastes contaminated with soil.

3.4 Gypsum & Plasterboard assessment

- 3.4.1 It must be noted that it is not proposed to accept and store any plasterboard on site.

3.5 Waste Deposit & Handling

- 3.5.1 Once a load has been accepted by the operator, trailers containing the waste loads will be parked in the appropriate parking bays as shown on Drawing No. ORW/3301/03. Waste will not be unloaded from the back of trailers therefore there will be no physical handling of the waste on site.

3.6 Waste Treatment

- 3.6.1 No mechanical treatment of waste will be undertaken on site.

3.7 Waste Types and Quantities

- 3.7.1 The locations of storage areas are shown on Drawing No. ORW/3301/03.
- 3.7.2 The Operator stores bales of SDF / RDF or bales of other household, commercial and industrial (HCI) waste types such as paper/cardboard, plastic, ferrous/non-ferrous metals etc. in the back of curtain side trailers prior to transportation to Felixstowe Trinity Terminal Port for shipping overseas for further recycling or disposal. Typically trailers of RDF will be stored on site for less than 48 hours but no longer than 5 days.

3.8 Waste Storage

- 3.8.1 Table 3.1 overleaf details the maximum pile sizes and duration for all wastes and stored on site. It must be noted the volume in each area has been provided as a guide and volumes/sizes of each bale stack may vary throughout the lifetime of the permit. The largest area on site would never comprise of more than 4 trailers of combustible waste meaning a maximum volume / tonnage of waste stored in the largest area would never surpass 364m³, 13m in length and three bales high unless in extenuating circumstances.
- 3.8.2 The Operator is able to store a maximum quantity of 2,145 tonnes of waste on site at any one time if all areas were full and trailers were at maximum capacity. This is considered a worst-case scenario, and it will be more likely approximately a maximum of 930.6 tonnes to be stored on site at any one time as the maximum payloads for deliveries to the Netherlands and Belgium are 28.2 tonnes and 25 tonnes for loads being exported to Germany. Therefore, trailers will never typically contain more than this.

Table 3.1 – Storage Table Details

Waste Storage Area Details														
Plan Ref	Description	Storage type	Containment / type	Height of firewall (m)	Max Width (m)	Max Length (m)	Max storage height (m)	Approx. Area (m2)	Conversion factor used	Approx. volume (m3) per container	Approx. volume total (m3)	Approx. no. of bales (per container)	Approx. tonnage (per container)	Max storage time
AREA 1	Storage of bales i.e. paper/cardboard, plastic, RDF/SDF bales	Bale stack (three high)	Secure curtain side trailers	N/A	2.2	12.6	3.3	27.72	1	91	364 (4 containers)	54	65	<5 days
AREA 2	Storage of bales i.e. paper/cardboard, plastic, RDF/SDF bales	Bale stack (three high)	Secure curtain side trailers	N/A	2.2	12.6	3.3	27.72	1	91	364 (4 containers)	54	65	<5 days
AREA 3	Storage of bales i.e. paper/cardboard, plastic, RDF/SDF bales	Bale stack (three high)	Secure curtain side trailers	N/A	2.2	12.6	3.3	27.72	1	91	364 (4 containers)	54	65	<5 days
AREA 4	Storage of bales i.e. paper/cardboard, plastic, RDF/SDF bales	Bale stack (three high)	Secure curtain side trailers	N/A	2.2	12.6	3.3	27.72	1	91	364 (4 containers)	54	65	<5 days
AREA 5	Storage of bales i.e. paper/cardboard, plastic, RDF/SDF bales	Bale stack (three high)	Secure curtain side trailers	N/A	2.2	12.6	3.3	27.72	1	91	182 (2 containers)	54	65	<5 days
AREA 6	Storage of bales i.e. paper/cardboard, plastic, RDF/SDF bales	Bale stack (three high)	Secure curtain side trailers	N/A	2.2	12.6	3.3	27.72	1	91	273 (3 containers)	54	65	<5 days
AREA 7	Storage of bales i.e. paper/cardboard, plastic, RDF/SDF bales	Bale stack (three high)	Secure curtain side trailers	N/A	2.2	12.6	3.3	27.72	1	91	364 (4 containers)	54	65	<5 days
AREA 8	Storage of bales i.e. paper/cardboard, plastic, RDF/SDF bales	Bale stack (three high)	Secure curtain side trailers	N/A	2.2	12.6	3.3	27.72	1	91	364 (4 containers)	54	65	<5 days
AREA 9	Storage of bales i.e. paper/cardboard, plastic, RDF/SDF bales	Bale stack (three high)	Secure curtain side trailers	N/A	2.2	12.6	3.3	27.72	1	91	364 (4 containers)	54	65	<5 days

3.9 Conversion Factors

3.9.1 The following conversion factors for calculating waste pile sizes are set out below.

Table 3.2 – Conversion Factors

Conversion Factors
Conversion factors for waste piles are worked out using the following methods set out by The Environment Agency
The maximum length width pile is based on the largest dimension – the volume of the pile has been calculated using the area x height x conversion factor of 1 as shown below
Conversion of 1 for materials stored as waste/bale stacks
Each bale measures 1.1m (W) x 1.4m (L) and 1.1m (H), 1.54m ² / 1.694m ³

3.10 Waste Removal and Export

3.10.1 All waste is exported onto ship vessels at Felixstowe Port for export into Europe. The producer site will have set up a contract with the destination site to ensure the waste is correctly coded to ensure all correct paperwork i.e. Annex VII form and transfrontier shipment regulations are followed. Before shipping the waste, the operator and producer sit will ensure the following:

- a) Make sure the waste is properly sorted so that it can be exported as green list waste. Some countries may still prohibit the import of such waste or require that you send it under notification controls. Check whether you can send the properly sorted waste as green list waste to the destination country.
- b) Make sure that the Annex VII form is fully completed and sign it – it must travel with the waste at all times. You should keep copies of Annex VII forms for 3 years. Competent authorities can ask to see copies at any time.
- c) Create a written contract between the person arranging the shipment (you as the exporter) and the importer (also called the consignee). The contract must make sure that, if the shipment cannot be completed as planned, or is found to be illegal, the exporter will take the waste back or recover it in another way and provide for its storage in the meantime. You must keep copies of the contract for 3 years – competent authorities can ask to see them.

3.10.2 No waste is likely to be exported off site to other areas in the UK other than rejected waste loads.

3.11 Record keeping

3.11.1 A2B-Online Limited use detailed waste transfer and product notes for paper and electronic form to ensure compliance with the Waste Duty of Care Code of Practice - March 2016 (Section 34(9) of the Environmental Protection Act 1990). The following points overleaf detail the correct information required in order to comply with the Waste Duty of Care Code of Practice which the Operator will provide on all documentation.

- 3.11.2 Records will be kept mainly in electronic format with paper documentation accompanying where necessary i.e. transfer/duty of care/product notes.
- 3.11.3 It is mandatory the following details are recorded for every load of waste deposited at the site:
- a) The date and time of delivery.
 - b) The name and address of the waste producer.
 - c) The detailed and accurate description of the waste including type, quantity (in tonnes or cubic metres) and EWC codes.
 - d) How the waste is contained e.g. loose, container type.
 - e) The carrier's name and address.
 - f) Driver's name, signature and vehicle registration No.
 - g) Signature or initials of persons producing/accepting/inspecting/carrying the waste where required
 - h) Additional handling details/notes made by the driver after inspection of the load.
 - i) SIC code of the premises which produced the waste.
 - j) SIC code of the transferor
 - k) Waste hierarchy declaration.
 - l) Information on previous treatment of the waste e.g. manual or mechanical.
- 3.11.4 The following details will be recorded for all deposits of non-conforming waste at the site and will be forwarded to EA, where required:
- a) Date and time of deposit.
 - b) A detailed and accurate description of the waste including type and EWC code.
 - c) The quantity of waste (in tonnes or cubic metres).
 - d) How the waste is contained e.g. loose, container type.
 - e) Name, address and telephone No. of waste producer.
 - f) The carrier's name, registration number and vehicle registration.
 - g) Signature or initials of persons who produced, accepting/inspecting and carrying the waste.
 - h) Reason for the rejection of waste and action taken.

- 3.11.5 The following details will be recorded for every load of waste leaving the site:
- a) The date and time of removal.
 - b) Detailed and accurate description of the waste including type, quantity of waste (in tonnes or cubic metres) and EWC codes.
 - c) How the waste is contained e.g. loose, container type.
 - d) The destination waste management site or exempt facility.
 - e) The name and registration No. of the carrier or employee removing the waste (if applicable) and vehicle registration No.
 - f) Signature or initials of persons i.e. transferor, transferee and carrier of the waste.
 - g) SIC code of the premises transferring the waste.
 - h) Waste hierarchy declaration.
 - i) Type of treatment waste subjected to (if relevant) e.g. manual, mechanical.
 - j) Annex VII form and other required shipment paperwork.
- 3.11.6 **Hazardous Waste:** the Operator will not be accepting any hazardous waste into the site and if any hazardous waste or non-conforming waste is to be removed, it will be done so using a fully completed hazardous waste consignment note and sent to a suitably permitted site. The records of which will be kept for 5 years.
- 3.11.7 A summary of waste types and quantities deposited at and removed from the site and origin and destination details are then forwarded to the EA, with submission due within one month of the end of each quarter as below:
- a) Quarter 1: January to March (due on or before 30th April)
 - b) Quarter 2: April to June (due on or before 31st July)
 - c) Quarter 3: July - September (due on or before 31st October)
 - d) Quarter 4: October - December (due on or before 31st January of the following year)
- 3.11.8 Outcomes of inspections of waste types, transfer/treatment areas, storage areas, drainage, infrastructure etc., will be recorded on-site inspection form and detailed comments will be entered into the site diary (including action taken or proposed). ORW/RF/4 (or similar).

- 3.11.9 Visitors to the site will sign the sites visitor's book located in the site office upon arrival stating the purpose of their visit and whom they represent.
- 3.11.10 Complaints will be recorded; ORW/RF/7 is included as an advisory. Section 4.9 demonstrates further action on the event of any complaints received.

3.12 Management Techniques

- 3.12.1 All measures necessary to achieve a high level of protection of the environment and to ensure that the site is operated in accordance with this EMS and conditions of the permit will be strictly adhered to.
- 3.12.2 The manner in which the facility is managed is a critical element in ensuring emissions from the site operations are minimised. Therefore, management of this facility will ensure:
- a) Staff are competent to manage and operate the facility i.e. Fit and proper persons;
 - b) Waste acceptance procedures are in place;
 - c) Appropriate storage and handling procedures are in place;
 - d) Waste/product despatch procedures are in place;
 - e) Procedures and control techniques in place to minimise potential emissions to air, land and water;
 - f) There is an EMS, i.e. this document, in place to ensure standards are maintained, including incidents and complaints management procedures;
 - g) A communication programme is in place; and,
 - h) A health and safety programme is in place and coherently conveyed to all staff and rigorously enforced throughout the whole of the organisation.

3.13 Site closure plan

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

4 Environmental Control, Monitoring and Reporting

4.1 Breakdowns and spillages

- 4.1.1 No mobile plant e.g. for loading / unloading and waste is required as waste will be stored on site in the trailers which they are delivered to site in. In the event of a HGV breaking down and unable to remove a load an alternative HGV cab unit will be sourced while the vehicle undergoes repair. If an alternative HGV cab unit cannot be sourced waste will be stored securely until the vehicle is repaired. The repair will be carried out at the most convenient location but will typically be at a specialist garage off site with absorbents used to clear oil or fuel spillages.
- 4.1.2 All site surfaces will be inspected daily when the site is in operation. Debris will be swept as required and placed in a skip for disposal to a suitably permitted site.
- 4.1.3 Any spillages of fuel/oil will be cleared immediately by depositing sand or absorbents on the affected area. The sand or absorbents will be placed in a skip to be taken to a suitably permitted site for disposal. All spillages of waste and windblown litter will be cleared by the end of the working day in which they occur. Spillage clearance procedures are detailed in Section 5.4.
- 4.1.4 All wastes liable to give rise to contamination will be removed from the site if the site is not secure or if operations cease or are temporarily suspended.

4.2 Site Inspections and Maintenance

- 4.2.1 The inspection frequencies for maintenance/housekeeping are listed on record form ORW/RF/4. The inspection form will be completed by a person who is familiar with the requirements of the EMS and permit for the site. All details of defects, problems and repairs carried out will be recorded on the form on the day that each event occurs. Detailed comments may also be recorded in the site diary. All repairs will be carried out within 5 working days unless agreed otherwise with the EA.

- 4.2.2 All repairs to site security will be made within 5 working days of the discovery of the damage and temporary measures will be put into place to ensure site is secure until permanent repairs has been carried out.
- 4.2.3 Any major defects found during the daily site inspection which are likely to lead to a breach of permit conditions will be repaired by the end of the working day in which they are found, where possible. If a repair is not possible by the end of the working day, the EA will be contacted to agree a suitable timescale for repair.
- 4.2.4 All defects and problems likely to give rise to pollution will be recorded on the form ORW/RF/4 with repairs/solutions being carried out immediately.

4.3 Control of Mud and Debris

- 4.3.1 It is not considered mud and debris will present as an issue, no waste is removed from the curtain side trailers in which the waste arrives on site in and are stored in. Waste accepted comprises of baled HCI waste or baled and wrapped SRF / RDF and are not considered dusty waste types.
- 4.3.2 The surfacing of the site is impermeable concrete which will not provide a source of mud or debris for HGV wheels to track off site. However, vehicles will be visually inspected before exit to check that loads are safe and that no mud is carried out onto the surrounding roads from the wheels or bodies of HGVs. Visual inspections of the vehicle running surfaces at the site will be carried out daily and staff will report any problems with mud or debris on the site roads immediately to the site manager.
- 4.3.3 The deposit of material on the surrounding access road will be treated as an emergency and will be cleared immediately by the operator using either a brush and shovel or vacuum tanker/road sweeper if necessary.

4.4 Dust Control

- 4.4.1 The containment of waste within the site, impermeable concrete surface and the nature of the wastes accepted at the site present a very low risk of dust.
- 4.4.2 If dust were to become a problem at the site, there is a permanent water supply available (mains water), and the operator may look to install additional suppression such as bowsers or dust cannons. Any external water pipes will be lagged to prevent frost damage during winter months.

4.5 Odour Control

- 4.5.1 The operator has a standalone Odour Management Plan (OMP) in place Ref. ORW-3301-F and should be read in conjunction with this EMS.

4.6 Litter Control

- 4.6.1 Given the nature of waste accepted at the site i.e. baled RDF/SRF which have been wrapped in a minimum of 10 layers of bale wrap, it is unlikely litter will be an issue.
- 4.6.2 Daily inspections for damaged bale stacks and litter will be carried out for the presence of windblown litter and operatives will be instructed to collect the litter and place it in a skip for disposal/recovery before the end of the working day. In any event, all light waste will be placed in rejected bins before the end of the working day. Regular checks of the areas immediately beyond the site boundary will be carried out by site operatives.

4.7 Control of pests, birds and other scavengers

- 4.7.1 As per the section above, it is considered the risk of pests are low due to the how the wastes are stored. The curtains of the trailers can remain closed to prevent access to the waste. If pests are discovered, which are only likely to result in damaged bales, the waste will be quarantined and pest contractor contacted to eradicate the issue.

4.8 Control and Monitoring of Noise & Vibration

- 4.8.1 No treatment of waste takes place at the site, waste bales will not be removed from the back of curtain side trailers and therefore the only noise source on site will be from HGV movements.
- 4.8.2 Operations will be carried out using the Best Practicable Means at all times. The measures outlined in Table 4.1 will ensure the noise levels at the site are managed appropriately by identifying: the likely sources of noise arising from the development; and, the actions to be taken / procedures to be followed or planned in order to prevent or minimise levels.

Table 4.1 - Noise Management Table

Potential Noise Source	Action to be taken to prevent or minimise noise
HGVs travelling to and from the site for delivery/collection of wastes/products.	<ul style="list-style-type: none">All vehicles are required to be driven onto and off site with due consideration for neighbouring premises.HGV movements will be spread out evenly throughout the day.
Loading/unloading of waste delivery vehicles	<ul style="list-style-type: none">No waste will be removed from the trailers.
Operation of loading plant	<ul style="list-style-type: none">As above no waste will be removed from the trailers, there will be no operation of loading plant.
Small vehicles travelling to and from the site (e.g. staff and visitor's cars, courier van deliveries etc.)	<ul style="list-style-type: none">All those working on and visiting the site to be made aware of need for considerate driving and keeping vehicles well maintained.Small vehicles will arrive marginally earlier than the main site operating hours.

4.9 Complaints Procedure

- 4.9.1 All complaints are recorded using a form similar to ORW/RF/7. The form as a minimum will include a record of the complaint, particulars of the complainant and details of any action taken to alleviate the problem to ensure the likelihood of a future third party complaint is minimised.

5 Emergency, Accident Management & Contingency Procedures

5.1 General

- 5.1.1 In addition to obligations imposed by RIDDOR '13 (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013) the permit holder will notify the EA of any serious injuries to employees of A2B-Online Limited, other site users or members of the public arising as a result of operations on site. Minor injuries such as cuts and grazes etc. will be recorded in the accident book on site. Separate procedures will be used for different types of emergency. An emergency at the site is defined by the site management as follows:

“Any incident which is likely to result in harm to human health or pollution of the environment or serious breach of permit conditions and serious detriment to the amenities of the locality.”

- 5.1.2 For all emergency situations, the deposit of any further waste will be suspended where necessary to allow action to be taken safely. If necessary, staff and other users of the site will be evacuated to an area which is a safe distance away from the hazards. Staff handling the emergency will be provided with and trained to use the necessary PPE (personal protective equipment) unless the manager instructs them that the hazard is too severe and outside help is needed from the emergency services or specialist waste contractors. A visitor's book will be kept to check who is on site at all times.

5.2 Fire

- 5.2.1 The site will be operated in accordance with an approved Fire Prevention Plan (FPP) which is a stand-alone document dealing with the prevention, mitigation and handling of any potential fires on site, please refer to document reference ORW-3301-B for more information. This will be the main site management document pertaining to fire-related issues, management, control and emergency procedures.
- 5.2.2 No waste will be burnt, and no fires will be allowed on site. In the event of a fire occurring on site, the operator/site supervisor will exercise his judgement and extinguish the fire with the water hose or suitable fire extinguisher and/or call the fire service for assistance. Any fires will be reported to the EA on the working day that they occur. All staff will be evacuated from the site if necessary. Smoking is not permitted on site. Firefighting residues will be disposed of to a permitted waste management facility.
- 5.2.3 For quick reference, the following actions will be taken when fire is detected or suspected (site operatives):
- a) DON'T PANIC
 - b) RAISE THE ALARM (IF NOT DONE SO ALREADY)
 - c) NOTIFY THE SITE MANAGER (IF SAFE TO DO SO)
 - d) **DO NOT TRY TO TACKLE THE FIRE YOURSELF UNLESS YOU ARE TRAINED IN DOING SO AND YOU ARE SURE OF THE NATURE OF THE FIRE**
 - e) LEAVE THE SITE USING THE MAIN ACCESS GATES AS QUICKLY AND AS ORDERLY AS POSSIBLE
 - f) ASSEMBLE AT THE SPECIFIED FIRE ASSEMBLY POINT WHICH IS LOCATED BY THE SITE ACCESS GATES.
 - g) THE SITE MANAGER OR DELEGATED OPERATIVE WILL BE IN CHARGE OF CALLING THE EMERGENCY SERVICES ON 999 AND ENSURING THAT ALL PERSONS WHO WERE WORKING ON THE SITE OR WHO SIGNED IN TO THE VISITOR'S BOOK ARE ASSEMBLED SAFELY
 - h) INFORM ALL NEIGHBOURING PREMISES WHO ARE LIKELY TO BE AFFECTED

- i) INFORM THE ENVIRONMENT AGENCY
- j) DO NOT RETURN TO THE SITE UNTIL YOU HAVE BEEN GIVEN THE ALL CLEAR BY THE EMERGENCY SERVICES AND THE SITE MANAGER

5.3 Breakdowns

- 5.3.1 As mentioned throughout this EMS no treatment of waste will be undertaken on site, waste will be accepted on site for storage only. Therefore breakdown of plant will not present as an issue as there is no plant on site.

5.4 Spillages

- 5.4.1 No fuels are stored on site. In the event of a spillage a spill containment kit (absorbent pads, booms or granules) will be used to prevent further spillage and the contaminated absorbents placed in a skip for disposal to a suitably permitted facility.
- 5.4.2 Any wastes which would be classified as having the potential to cause polluting runoff are stored within the concrete area which is a sealed drainage system.
- 5.4.3 All site surfaces will be inspected daily for the presence of spillages when the site is in operation. Debris will be swept as required and placed in a skip for further processing on site and sent to a suitably permitted site.
- 5.4.4 All wastes liable to give rise to contamination will be removed from the site within an EA agreed timescale.

5.5 Drums

5.5.1 The deposit of drummed waste will not be allowed at the site. If a drum is concealed within a load and is not observed until the trailer is in the appropriate storage area, then the following procedure will apply:

- a) The staff member will visually check the condition of the drum from a safe distance, noting any labels referring to the possible contents or hazards.
- b) The site manager will be contacted to verify the observations and to decide on further action.
- c) The producer of the waste and the EA will be contacted for advice and further information if necessary and both will be informed that a breach of the Duty of Care and site permit conditions has occurred as the result of the unauthorised deposit.
- d) No further waste will be deposited until the emergency has been dealt with.
- e) All spillages will be cleared using a spill containment kit and all contaminated absorbents placed in a skip for disposal to a suitably permitted waste management site.
- f) If the deposit results in serious reactions with other waste or harmful emissions or the drum contents cannot be identified, then the emergency services and/or specialist waste contractors will be brought in to assist. If necessary, staff will be evacuated from the site or to a safe area within the site and all occupants of neighbouring properties will be informed.

5.6 Adverse Reactions

5.6.1 No wastes are accepted which will react to present such a hazard. If unauthorised waste is found in a load and does present such a hazard the same procedures as for the deposit of drums (above) shall apply.

5.7 Staff Shortages

- 5.7.1 In the event of unforeseen staff shortages arising from illness, suspension or no shows, the operator will make a judgement whether to reduce the number of incoming loads and divert material to an alternative site. The operator would then look to then seek temporary employment from an adjacent site or someone within the company within 48 hours to ensure the site can continue to operate at its required capacity.

5.8 Closure of Destination Sites

- 5.8.1 In the event of destination site closures or seasonal demands for wastes leading to a longer storage duration, the operator can divert incoming waste and send stored waste to an alternative site.

5.9 Operational Failure

- 5.9.1 No waste treatment is undertaken on site therefore the only operational failure that could occur is from HGV delivery vehicles breaking down. In the event of this the site manager will be contacted by staff and will decide whether operations are to continue or be suspended prior to corrective action being taken. Serious operational failures, which result in the closure of the site, will be recorded in the site diary.

5.10 Bomb Scare

- 5.10.1 In the unlikely event of a bomb scare, the site will be evacuated and the police contacted. The police will then assume control of the site until the threat has been verified or the device defused and removed. The EA will be kept informed of the events on site.

6 Weather Conditions & Adapting to Climate Change

6.1 Weather Conditions

6.1.1 The site is set up to receive weather alerts from the Met Office for the following weather conditions which could cause a potential complaint off site or potential breach of permit:

- i) Prolonged periods of heavy rainfall causing mud and surface water ponding; this could also lead to waste becoming wet and causing odour
- ii) Periods of cold weather leading to stockpiles freezing reducing processing operations causing over stockpiling of waste
- iii) High winds creating a risk of litter and dust escaping beyond the site boundary
- iv) Droughts or periods of hot weather which could lead to heating of combustible waste, water shortages, hosepipe bans and excessive dust.
- v) Dense fog leading to poor visibility causing accidents.

6.1.2 The site will install the following preventative measures to ensure the above do not hinder operations:

HEAVY RAINFALL

- It is not considered increases in heavy rainfall will affect site operations as waste is stored off the ground in the back of containers.
- Should long periods of rainfall be likely, the site may consider hiring (as a result of daily inspections) a third-party road sweeper to cover the wet period to ensure surfaces are swept thoroughly throughout the day.

HIGH WINDS

- In the event of red alert winds, the Operator may be forced to close operations until conditions have improved.
- No loose waste is stored on site, in the event of high winds the curtains on the trailers will remain closed.

DROUGHTS/WARM, DRY WEATHER

- In cases such as a hosepipe ban or water shortage, the site will ensure there is additional water available i.e. tanks which can be used for to ensure suppression techniques can still function such as in the event of a fire.

DENSE FOG (POOR VISIBILITY)

- The site will not operate in conditions of poor visibility such as dense fog to reduce the risk of vehicle collisions or other potential accidents. As only the storage of waste takes place on site and no treatment operations, it is not considered poor visibility would present a major issue on site.

6.1.1 Climate change

6.1.3 The Met Office UK Climate Projections (UKCIP) has developed scenarios of climate change, which are summarised on the Oxfordshire Climate Action webpage as:

- Warmer, wetter winters
- Hotter, drier summers
- Increased frequency and intensity of extreme weather (storms, droughts, intense downpours)

6.1.4 Reflecting these, the UK Climate Change Risk Assessment (CCRA) identifies a number of priority risks and opportunities. The likely direct climate change-related threats that can be considered to be of most relevance to minerals planning and management are:

- increases in the probability and severity of flooding (fluvial, groundwater, surface);
- exposure to high temperatures and heatwaves; and
- shortages in availability of water.

6.2 Flood Risk

- 6.2.1 The site is within Flood Zone 1 which is classified as the lowest probability and risk of fluvial flooding. It is also identified on as being at very low risk of surface water flooding. The site is less than 1ha in area and so in line with the NPPF a site-specific flood risk assessment is not required.
- 6.2.2 The site comprises previously developed land and no construction of new buildings or impermeable surfacing is proposed. The existing site surface water drainage system includes underground interceptor which would reduce and slow run-off prior to being discharged to foul sewer. This will be periodically checked (monthly or daily in periods of heavy rain) and emptied by a third-party contractor when 80% full.
- 6.2.3 The external yard is sealed by the 0.3m kerbing around the waste storage areas, the site is laid to fall towards the interceptor, preventing run-off and washing away out of the site.
- 6.2.4 Therefore, it is considered that the site is not at risk from flooding and would not increase the risk of flooding elsewhere.
- 6.2.5 The site is operated in accordance with an approved FPP. The site does not store any mechanically treated waste i.e. shredded waste in the open. All waste is stored in bale stacks which have been securely wrapped 10 times in the back of trailers.

6.3 High Temperatures and Heatwaves

- 6.3.1 Staff operating outside or maybe potentially vulnerable to high temperatures and heatwaves. During these instances, staff will increase their daily breaks and seek shelter in the site office.
- 6.3.2 As no treatment operations are undertaken on site and waste is accepted for storage only it is not anticipated site operatives will have to be in the yard for extended periods of time.

- 6.3.3 The site is not expected to accept any wastes with the potential to create dust, but water supplies will always be available for dampening site surfaces.

6.4 Availability of Water

- 6.4.1 There is no water used on site associated with waste operations.
- 6.4.2 The site office has access to mains water for staff facilities.

6.5 Conclusion

- 6.5.1 The options to mitigate and adapt to climate change are also limited. The options identified in this section are considered to be proportionate, practicable and deliverable and it is considered operations at the site would not be affected by climate change or adverse weather conditions.

7 Training for Site Staff

7.1 Training needs assessment

- 7.1.1 All new and existing site staff are subject to a specific training regime based on their responsibilities at the site to ensure all operations are carried out without harm to the environment or amenity of the surrounding area. Training in all aspects of the site and waste operations at the site with regard to the individual responsibilities of the site staff will help to prevent incidents occurring which may have an adverse impact on the environment and/or the employees and their co-workers.
- 7.1.2 An employee training record (i.e. ORW/RF/6 in Appendix II) shall provide a comprehensive checklist for the training needs of all new site staff and also serves as a training review for existing site staff which will be carried out annually or a period set at the operator's preference.

7.2 Site Rules and Infrastructure Training

- 7.2.1 This information is provided to all employees, visitors and contractors with a full understanding of the site's conditions of use, which is communicated and documented at induction for all staff with specific induction for visitors and contractors.
- 7.2.2 Competency should be demonstrated within this field to ensure the employee is fully aware of the site's surroundings and operations to ensure their safety and compliance with specific operating conditions at the site.

7.3 Emergency procedures training

- 7.3.1 All employees are required to be familiar with the Environmental Controls in Section 4.0 and the Emergency Procedures as detailed in the Section 5.0.

- 7.3.2 In addition to normal operating conditions as specified in the site rules, employees must also be trained in dealing with eventualities which may occur outside the scope of normal operating conditions, so they are aware of how to deal with these situations in advance of an occurrence.

7.4 Fire Safety / Firefighting Training

- 7.4.1 Management must provide all employees with appropriate fire safety training with regard to their individual responsibilities.
- 7.4.2 Emergency procedures detailing what measures employees should adopt should a fire occur at the site are also detailed in Section 5.2 and are covered by the 'emergency procedures' training (see Section 7.3).
- 7.4.3 Regular fire drills are undertaken by site management to ensure proper procedures are followed by employees in the unlikely event that a fire incident occurs. These will be unannounced drills and will not form part of the induction or review training as specified in Section 7.1.

7.5 Recognition of Waste Types Training

- 7.5.1 All employees are given induction training and subsequent regular training to identify those waste types which are permitted for acceptance at the site under the site's permit and those wastes which are not. This will include specific training to identify those common wastes which may be found following deposit and are not permitted at the site and will also include more obscure wastes and how to handle these wastes safely. All employees are advised that they should refer any unrecognisable or unknown wastes to senior management, who should, in turn, follow procedures outlined in the EMS and/or contact the EA to agree a suitable method for removal.
- 7.5.2 Training is provided to all site users who handle waste on site and those in charge of administration and reporting. In-depth training will also be provided to drivers responsible

for collecting wastes from the site of production in accordance with Section 3.0. They will be trained to identify any wastes not covered by the permit for the site and inform the producer that an alternative facility must be sought for any non-compliant wastes.

7.6 Storage Areas / Limits Training

- 7.6.1 Those employees who carry out their responsibilities at the site and those in senior posts must be trained to identify appropriate waste storage areas to ensure that waste storage operations comply with the requirements of the permit for the site.
- 7.6.2 Employees in these roles must also be trained to recognize storage limits to ensure that they are in accordance with those specified in Section 3.8.

7.7 Vehicle / Plant Preventative Maintenance Training

- 7.7.1 This training is provided specifically for the vehicle operators in order to ensure that all vehicles are checked regularly to prevent any occurrences which may lead to any adverse impacts on the environment or human health.
- 7.7.2 Training will be based on the preventative maintenance schedule supplied by the plant/equipment manufacturer.
- 7.7.3 The same training will be provided to senior management enabling a dual-level maintenance programme.

7.8 Duty of Care Training

- 7.8.1 All employees dealing with consignments of waste are trained in the completion of Duty of Care Waste Transfer Notes and the appropriate auditing of destination sites and/or contractors to ensure compliance.

7.9 Permit / Management System Training

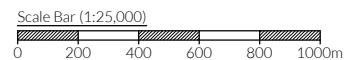
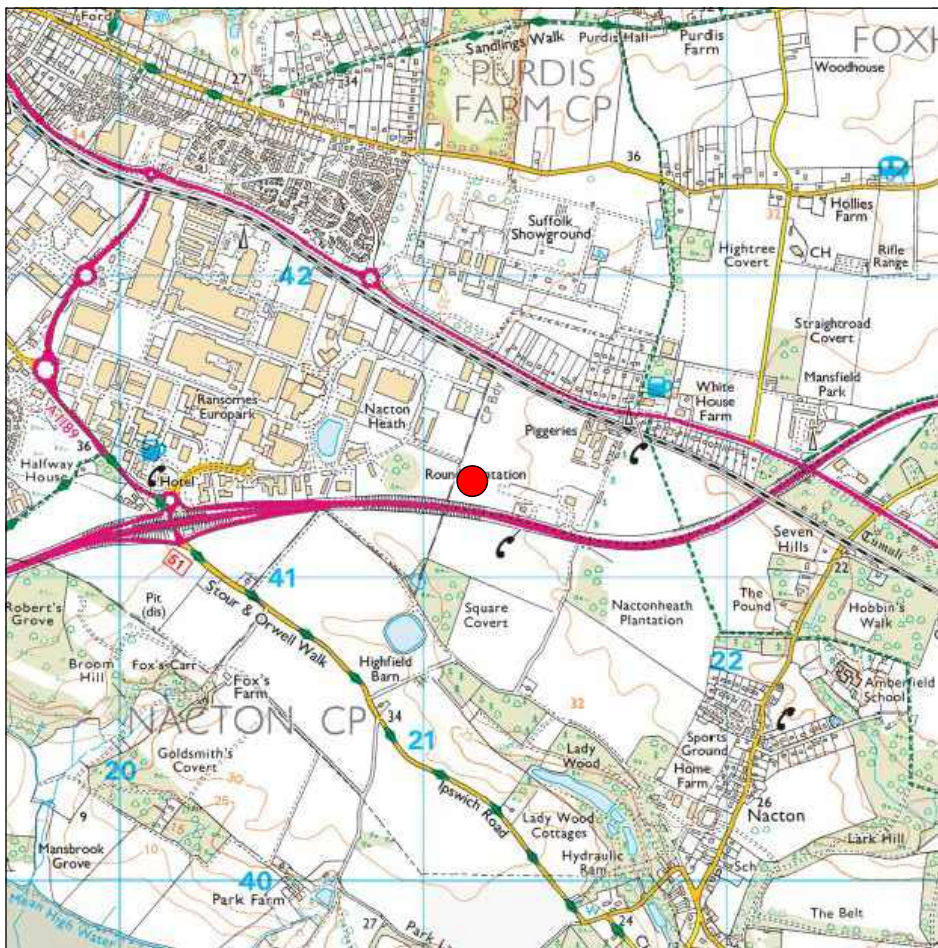
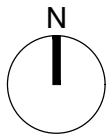
- 7.9.1 All employees will be inducted into the operating conditions as prescribed in the permit for the site. Whilst much of the above training will provide specific guidance on many aspects of these documents, all employees will be made aware of the location of the EP and EMS in the site office. All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

7.10 Training for Contractors

- 7.10.1 General site training will be provided to any contractors who are working on the site on a temporary basis as described in Sections 7.2, 7.3 and 7.4 above.
- 7.10.2 Additional training will be provided to contractors in their area of expertise. If they are dealing with specific items of plant/machinery, site operating conditions and a general understanding of the permit conditions will be provided to prevent any adverse impacts on the environment.

Appendix I

Drawings



NOTES

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REVISION HISTORY

Rev:	Date:	Init:	Description:
-	07.03.25	JH	Initial drawing

KEY:

 Site location

TITLE:

SITE LOCATION MAP

CLIENT:

A2B Online Ipswich

PROJECT/SITE:

A2B House, Orwell Crossing, Nacton, Ipswich
IP10 0DD

SCALE @ A4:

1:25,000

CLIENT NO:

3301

JOB NO:

001

DRAWING NO:

ORW-3301-01

REV:

-

STATUS:

Issued

DATE:

07.03.25

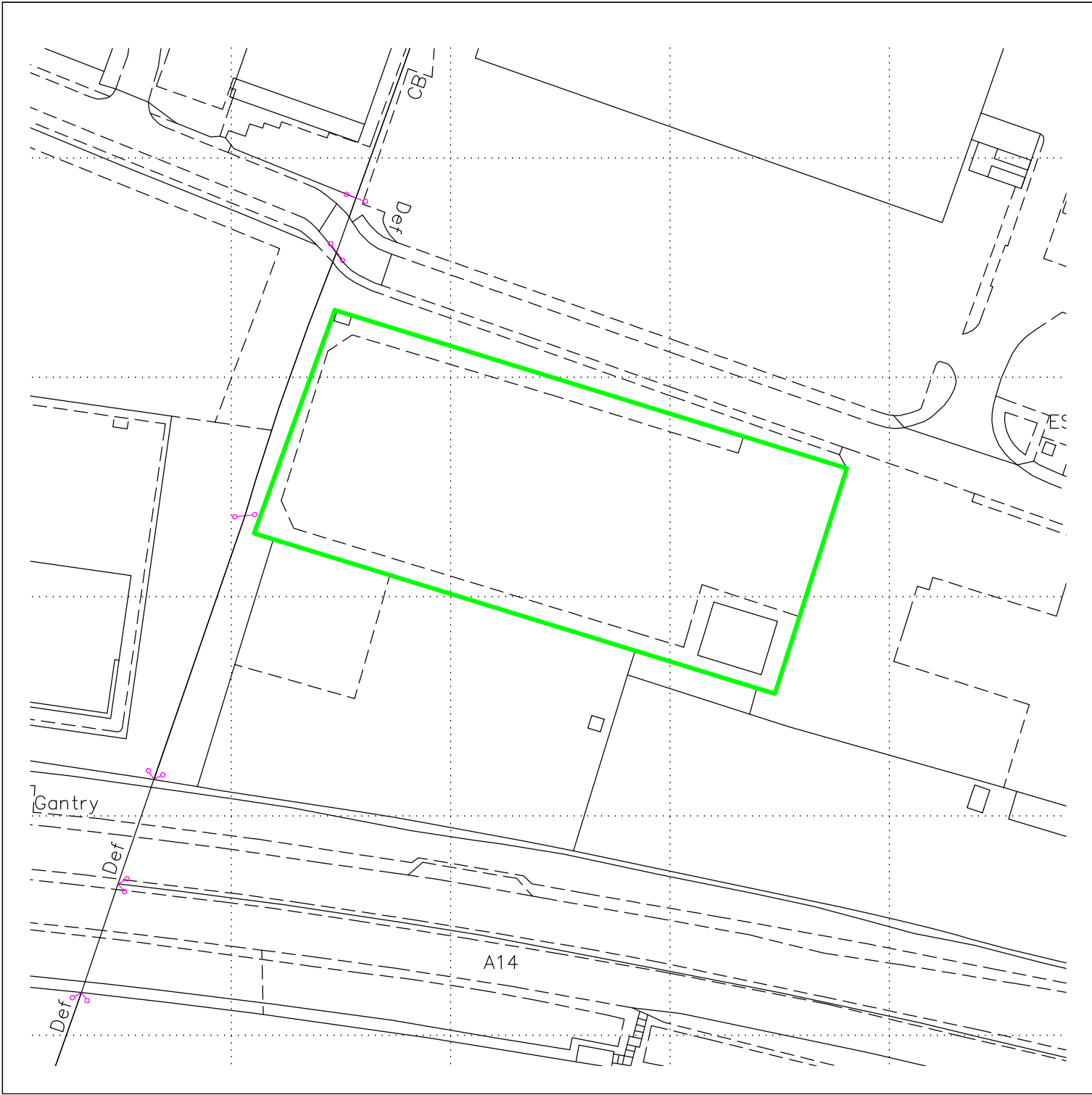
DRAWN:

JH

CHECKED:

EG





NOTES

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REVISION HISTORY			
Rev:	Date:	Init:	Description:
-	07.03.25	JH	Initial drawing

KEY:

—— Permit boundary

N

Scale Bar (1:1,250)

0

10

20

30

40

50m

TITLE:

PERMIT BOUNDARY PLAN

CLIENT:

A2B Online Ipswich


PROJECT/SITE:

A2B House, Orwell Crossing, Nacton, Ipswich
IP10 0DD

SCALE @ A4:	CLIENT NO:	JOB NO:
1:1,250	3301	001


DRAWING NO:	REV:	STATUS:
ORW-3301-02	-	Issued

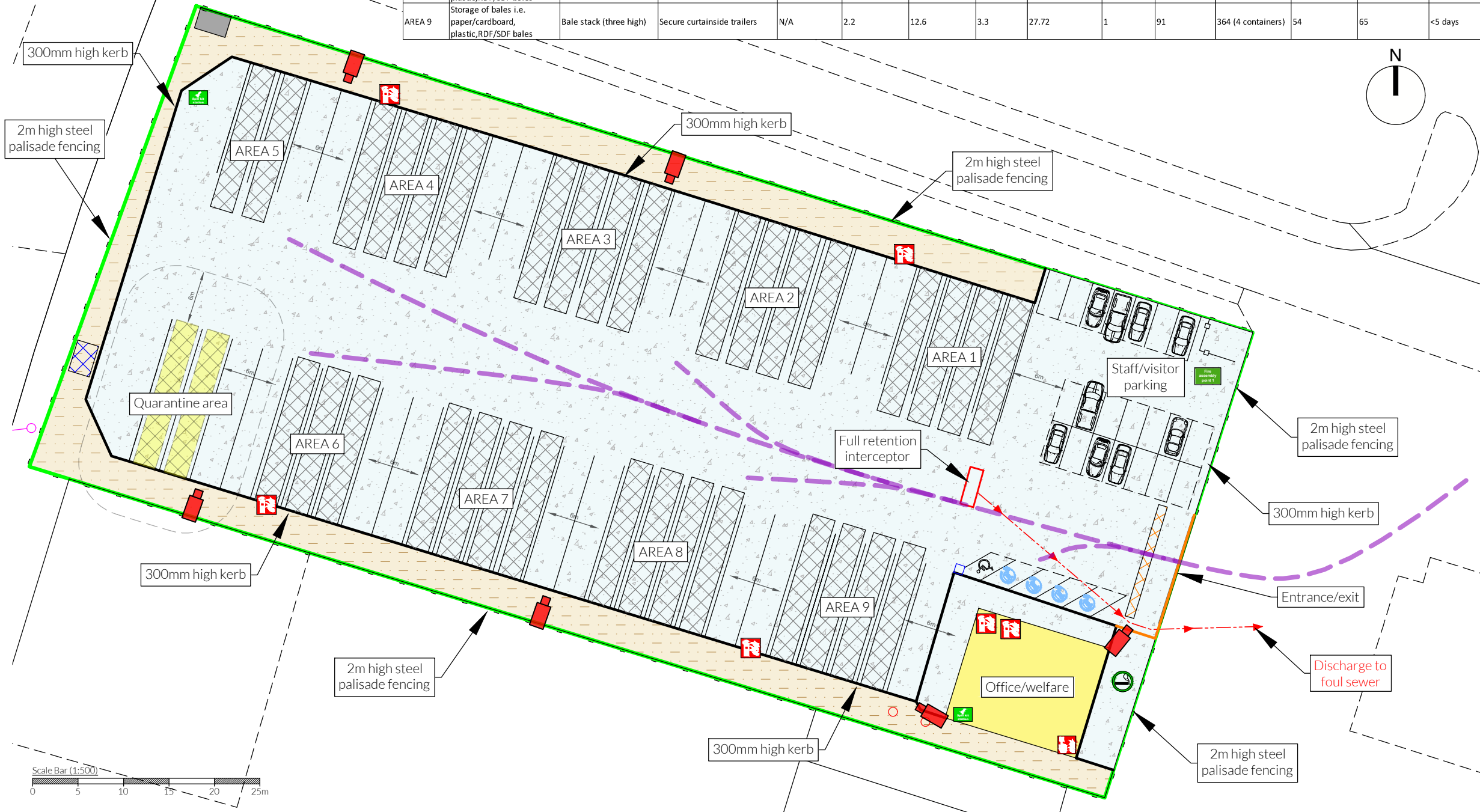
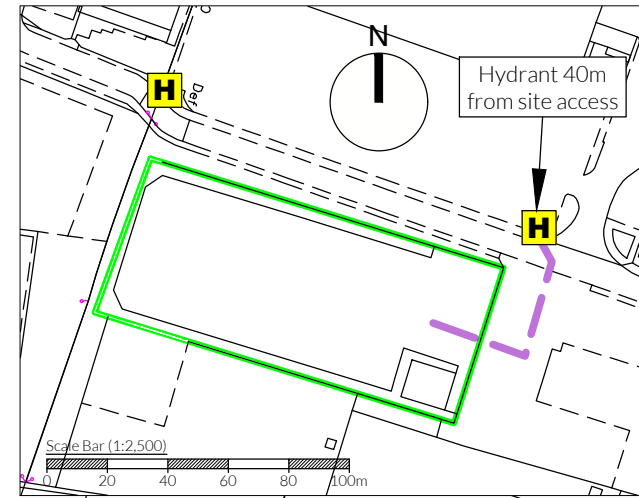
DATE:	DRAWN:	CHECKED:
07.03.25	JH	EG



Oaktree Environmental

Waste, Planning & Environmental Consultants





Storage Area Details														
Plan Ref	Description	Storage type	Containment / type	Height of firewall (m)	Max Width (m)	Max Length (m)	Max storage height (m)	Approx. Area (m2)	Conversion factor used	Approx. volume (m3) per container	Approx. volume total (m3)	Approx. no. of bales (per container)	Approx. tonnage (per container)	Max storage time
AREA 1	Storage of bales i.e. paper/cardboard, plastic,RDF/SDF bales	Bale stack (three high)	Secure curtainside trailers	N/A	2.2	12.6	3.3	27.72	1	91	364 (4 containers)	54	65	<5 days
AREA 2	Storage of bales i.e. paper/cardboard, plastic,RDF/SDF bales	Bale stack (three high)	Secure curtainside trailers	N/A	2.2	12.6	3.3	27.72	1	91	364 (4 containers)	54	65	<5 days
AREA 3	Storage of bales i.e. paper/cardboard, plastic,RDF/SDF bales	Bale stack (three high)	Secure curtainside trailers	N/A	2.2	12.6	3.3	27.72	1	91	364 (4 containers)	54	65	<5 days
AREA 4	Storage of bales i.e. paper/cardboard, plastic,RDF/SDF bales	Bale stack (three high)	Secure curtainside trailers	N/A	2.2	12.6	3.3	27.72	1	91	364 (4 containers)	54	65	<5 days
AREA 5	Storage of bales i.e. paper/cardboard, plastic,RDF/SDF bales	Bale stack (three high)	Secure curtainside trailers	N/A	2.2	12.6	3.3	27.72	1	91	182 (2 containers)	54	65	<5 days
AREA 6	Storage of bales i.e. paper/cardboard, plastic,RDF/SDF bales	Bale stack (three high)	Secure curtainside trailers	N/A	2.2	12.6	3.3	27.72	1	91	273 (3 containers)	54	65	<5 days
AREA 7	Storage of bales i.e. paper/cardboard, plastic,RDF/SDF bales	Bale stack (three high)	Secure curtainside trailers	N/A	2.2	12.6	3.3	27.72	1	91	364 (4 containers)	54	65	<5 days
AREA 8	Storage of bales i.e. paper/cardboard, plastic,RDF/SDF bales	Bale stack (three high)	Secure curtainside trailers	N/A	2.2	12.6	3.3	27.72	1	91	364 (4 containers)	54	65	<5 days
AREA 9	Storage of bales i.e. paper/cardboard, plastic,RDF/SDF bales	Bale stack (three high)	Secure curtainside trailers	N/A	2.2	12.6	3.3	27.72	1	91	364 (4 containers)	54	65	<5 days

NOTES
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REVISION HISTORY			
Rev:	Date:	Init:	Description:
-	07.03.25	JH	Initial drawing

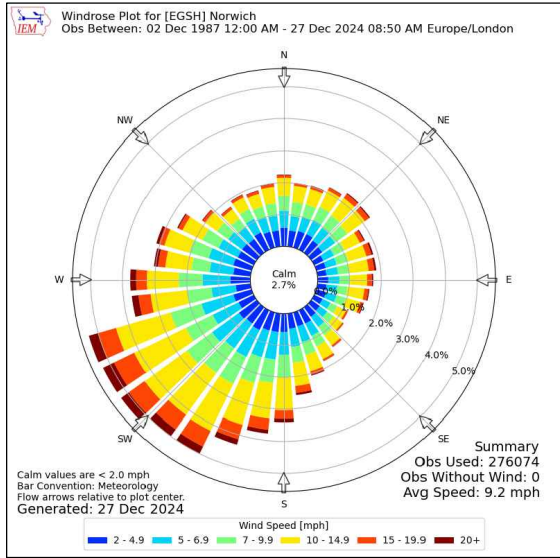
- KEY:
- Permit boundary
 - Non-waste storage (AdBlue)
 - Waste storage areas
 - Concreted areas
 - Pedestrian walkway
 - Hardstanding
 - Office/welfare
 - Quarantine area
 - Firefighting equipment/extinguishers
 - Fire alarms (indicative locations)
 - Spill kits (indicative locations)
 - Fire hydrant
 - Fire assembly point
 - Pan, tilt & zone cameras with 360 50cm coverage
 - Designated smoking area
 - Access route for emergency services
 - Manhole
 - Gully
 - Firewater boom / sandbag deployment

TITLE: SITE LAYOUT & FIRE PLAN		
CLIENT: A2B Online Ipswich		
PROJECT/SITE: A2B House, Orwell Crossing, Nacton, Ipswich, IP10 0DD		
SCALE @ A3: 1:500	CLIENT NO: 3301	JOB NO: 001
DRAWING NO: ORW-3301-03	REV: -	STATUS: Issued
DATE: 07.03.25	DRAWN: JH	CHECKED: EG

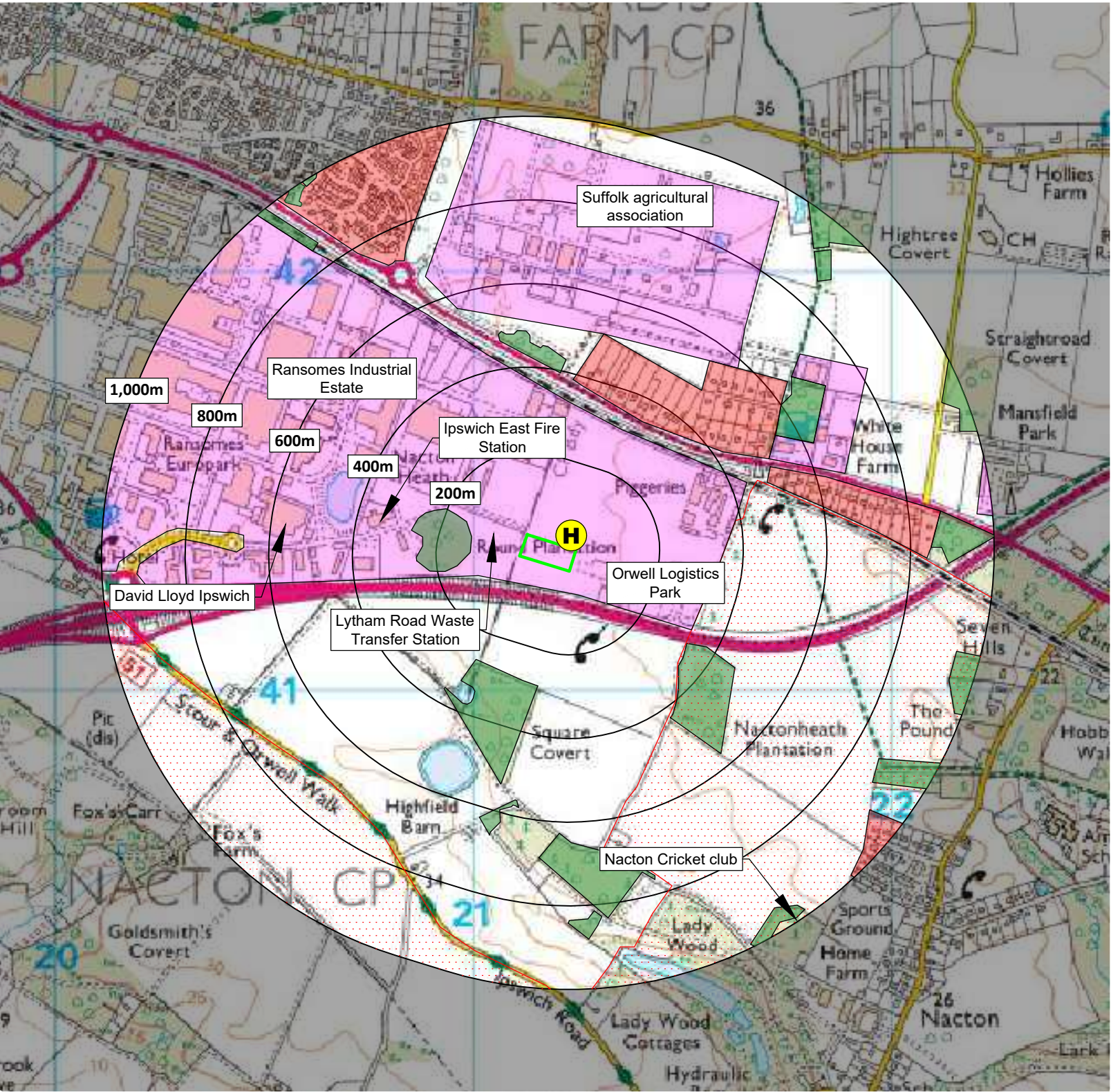


KEY:

- Permit boundary
- Surface water body (river / stream / pond / pool / lake)
- Workplaces (includes agriculture industry, commerce and retail)
- Areas with mix of residential, retail and commercial properties
- Residential blocks
- Class A, B, C roads
- Nearest fire hydrant
- Railway line
- Woodland areas
- Priority habitat inventory (deciduous woodland)
- Areas of outstanding natural beauty



Compass Wind Rose for (EGSH) Norwich Period
1987-2024
- source: Iowa State University

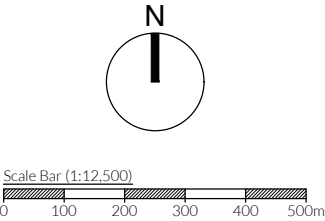


NOTES

- Boundaries are shown indicatively.
 - Wind rose data shows the prevailing wind direction to be Southerly.
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REVISION HISTORY

Rev:	Date:	Init:	Description:
-	07.03.25	JH	Initial drawing



TITLE: RECEPTOR PLAN		
CLIENT: A2B Online Ipswich		
PROJECT/SITE: A2B House, Orwell Crossing, Nacton, Ipswich IP10 0DD		
SCALE @ A3: 1:12,500	CLIENT NO: 3301	JOB NO: 001
DRAWING NO: ORW-3301-04	REV: -	STATUS: Issued
DATE: 07.03.25	DRAWN: JH	CHECKED: EG



Appendix II

Record Keeping Forms & Procedures

A2B-ONLINE LIMITED
REJECTED WASTE - RECORD FORM ORW/RF/2

DATE	
TIME	
WASTE DESCRIPTION	
QUANTITY OF WASTE	
PRODUCER/HOLDER'S NAME, ADDRESS & TELEPHONE No.	
NAME OF CARRIER	
VEHICLE REGISTRATION	
CARRIER REG. No.	
REASON FOR REJECTION OF WASTE	
ACTION TAKEN	

A2B-ONLINE LIMITED SITE INSPECTION FORM – ORW/RF/4									
WEEK STARTING									
TYPE OF INSPECTION		FREQ	DAY						
			M	T	W	T	F	S	S
SITE ENTRANCE/NOTICE BOARD		WEEKLY							
SECURITY - GATES		WEEKLY							
SECURITY - FENCING		WEEKLY							
SITE ROADS (CLEAR FROM HAZARDS)		DAILY							
IMPERMEABLE CONCRETE AREAS		DAILY							
BUND AROUND CONCRETE PAD (INTEGRITY)		DAILY							
DRAIN (FUNCTIONING)		DAILY							
WASTE CONTAINERS		DAILY							
WASTE STORAGE LIMITS BALE STACKS		DAILY							
REJECTED WASTE TYPES / STORAGE		WEEKLY							
NOISE LEVELS		DAILY							
FIRES (ANY INCIDENTS REPORTED)		DAILY							
FIREWATER CONTAINMENT (SANDBAGS)		WEEKLY							
NO SMOKING SIGNS IN PLACE		MONTHLY							
SPILLAGES & ABSORBENTS		DAILY							
FUEL TANK/BUND INTEGRITY		WEEKLY							
LITTER		DAILY							
DUST		DAILY							
ODOUR		DAILY							
VERMIN		DAILY							
RECORDS		WEEKLY							
COMPLAINTS RECEIVED		AS REQUIRED							
OTHER (SEE NOTES BELOW)		AS REQUIRED							
INSPECTION CARRIED OUT BY									
		NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):							
CHECKED BY					SIGNATURE				
POSITION					DATE				
<i>Sheet</i>					<i>of</i>				

A2B-ONLINE LIMITED
PREVENTATIVE MAINTENANCE CHECKLIST– ORW/RF/5

CHECKED BY	POSITION
DATE	DATE OF LAST CHECKLIST

	EQUIPMENT ITEM					
OFFICIAL MAINTENANCE CHECK REQUIRED (Y/N)						
IF NO, DATE OF LAST CHECK						
IF YES, DATE OF NEXT CHECK						
IS ITEM IN CORRECT WORKING ORDER						
LEAKAGES OF OIL/DIESEL ON MOBILE PLANT / VEHICLES						
IF NO, WHAT REPAIRS ARE REQUIRED (USE SEPARATE SHEET IF REQUIRED)						
WERE REPAIRS DETAILED ON THE LAST CHECKLIST						
IF YES, HAVE THEY BEEN CARRIED OUT						
ADDITIONAL REPAIRS OR ACTIONS REQUIRED						

A2B-ONLINE LIMITED

EMPLOYEE TRAINING NEEDS ASSESSMENT / REVIEW - ORW/RF/6

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

A2B-ONLINE LIMITED
COMPLAINTS REPORT FORM (ORW/RF/7)

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

COMPLAINT RECORDING PROCEDURE:

Any complaints received will be recorded on form ORW/RF/7. This form will normally be completed, signed and dated by the Site Manager; if they are not available the Office Manager will complete the form.

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

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

Appendix III

Environmental Permit

Appendix IV

Health & Safety – Conditions of Site Use

HEALTH AND SAFETY - CONDITIONS OF SITE USE

The following guidelines apply to all site personnel, contractors and visitors using the site (where applicable).

- 1) The site is covered by the Health and Safety at Work Act 1974 and its associated regulations and all users must abide by any relevant provisions. Any person found to be in contravention of the requirements of this Health and Safety Statement will be asked to leave the site.
- 2) All visitors must sign the visitor's book upon entry to and exit from the site. All vehicle drivers must report to the office and await instruction from the site manager/deputy before proceeding to deposit waste at the site.
- 3) All accidents, diseases, injuries or dangerous occurrences shall be reported to the site manager. All instructions issued by the site manager in respect of health and safety at the site must be followed by all site users.
- 4) A first aid box (including eye-wash bottles) will be kept in the site office. If you are injured on site please alert a member of staff/trained first-aider for assistance.
- 5) All persons must wear the appropriate PPE on site including high visibility jackets and hard hat.
- 6) Safety boots must be worn by all persons in the waste processing/storage areas.
- 7) Protective gloves must be worn for any operations which present a hazard of puncture to or laceration of the skin or for any manual handling work carried out on site.
- 8) Ear defenders, safety helmets (hard hats) and eye protection will be issued when deemed necessary and must be worn by all employees and contractors where required by the site manager or other site representatives.
- 9) Fire extinguishers are kept on site to deal with any fires - fires shall only be dealt with by employees of A2B-Online Limited unless alternative instructions are given by the site manager. Access to fire exits and firefighting equipment must be kept clear at all times. If a fire alarm sounds please follow instructions and leave the site in an orderly fashion.
- 10) Persons who are suspected to be under the influence of drugs or alcohol will be removed from the site.
- 11) Smoking is not permitted on the site.
- 12) Observe and follow all traffic directions and traffic/safety signs.
- 13) Drivers must comply with all safety instructions given by the site manager or appointed deputy.
- 14) All drivers are responsible for ensuring that their vehicle is safely loaded. Unsafe loads will not be accepted at the site and will not be allowed to leave the site until they have been made safe.
- 15) Drivers waiting to tip at the site will follow the instructions of the operator and only tip in the designated area, unless advised otherwise. No tipping will take place over sorted stockpiles.
- 16) Drivers must remain in the cab or stand well clear of the vehicle during loading or tipping. Once the vehicle has been loaded it must be securely sheeted (if necessary) before leaving the site. When sheeting and unsheeting the vehicle ensure that the engine is switched off, the ignition key removed and the parking brake is on. Do not gain access using the mudguards and wheels. Ensure that ropes, hooks and sheets are in good condition.
- 17) Never travel with the vehicle body raised and ensure the maximum height of the raised body the vehicle is known.

Declaration: To be completed by site users

I have read and understand the conditions of use for this site and agree to comply with them at all times. I accept that neither A2B-Online Limited nor their employees shall be liable for any loss or injury arising from my non-compliance with the above conditions.

Signed.....

Print name.....

Company/Organisation.....

Date.....

Note: these conditions are included in the EMS for information only and may be revised regularly as part of the site health and safety policy.