



Environmental Management System (EMS)

**SPENCER RECYCLING LTD
Unit 4 Weaver Industrial Estate
Speke
Liverpool
L19 8JA**

Version 1 (October 2018)

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1. GENERAL

1.1 Site Covered by the Management Plan

The proposed Spencer Recycling Ltd facility is located on Unit 4 of the Weaver Industrial Estate, Speke. This is an established industrial location, with a number of similar operations in neighbouring yards. The site consists of an open yard with weighbridge, portacabin offices, open storage bays and mobile plant used for loading and processing. The Mersey Estuary is located beyond the dock wall 58m to the South West.

The proposed operation is the recycling of inert and excavation waste and the production of a recycled accredited reinstatement aggregate for reuse in the highways and utilities sector.

The site address is:

Aggregates Yard
Unit 4 Weaver Industrial Estate
Speke
Liverpool
L19 8JA

1.2 Waste Types and Quantities

The types and quantities of waste to be accepted at the site will be governed by the conditions of the Bespoke Environmental Permit to be issued by the Environment Agency. Waste inputs are restricted to inert excavation wastes from highways maintenance projects in the locality. The quantities will not exceed those stipulated in these authorisations, with the maximum annual throughput being 75,000 tonnes.

Waste types will be restricted to the following EWCs (from SR2008no11):

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 other than those mentioned in 17 01 06
17 02	wood, glass and plastic
17 02 02	Glass
17 03	bituminous mixtures, coal tar and tarred products
17 03 02	bituminous mixtures other than those mentioned in 17 03 01
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	soil and stones other than those mentioned in 17 05 03
17 05 08	track ballast other than those mentioned in 17 05 07
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

And also the following EWCs from 2010no12:

19	WASTE FROM WASTE MANAGEMENT FACILITIES
19 12	Wastes from the Mechanical Treatment of Wastes

191209	Minerals (for example sand, stones)
191212	Aggregates only, including treated bottom ash (including IBA and slag other than that containing dangerous substances)

1.3 **Operation of the Site**

Waste Management operations at the site are undertaken solely by Spencer Recycling Ltd, who are also the Permit holder.

1.4 **Authorised Activities**

The Environmental Permit for the site will authorise the storage and treatment of inert and excavation waste for the purpose of recycling.

The technical competence provision for the site under Regulation 4 of the Waste Management Regulations 1994 is provided by Mr Ian Cook, who will acquire the relevant EPOC qualification.

Site Operations will comply with all applicable legislation (both Environmental and Health/Safety) for the reception, storage, treatment and transfer of material imported at the site.

1.5 **Hours of Operation**

The receipt of waste shall be restricted to the following periods:

Monday to Friday	0700-1800
Saturdays	0730-1300

The site is will not process materials on Sundays or bank holidays.

1.6 **Display of Waste Management Licence, Planning Permission and Operational Plan**

A copy of the Environmental Permit and this EMS will be retained at the site office.

1.7 **Contact Details**

Persons to contact during operating hours:

Name	Role	Telephone Number
Mr Tony Spencer	Manager	tba
Mr Ian Cook	Ops Manager/TCM	07712474363

Contact names and numbers for use when emergency access is required is shown on the Site Identification Board at the entrance gate.

1.8 **Staffing and Management**

Whenever the site is open to receive or dispatch waste the site shall be supervised by at least one member of staff who is suitably trained and fully conversant with the requirements of the Permit and the Management Plan with respect to:

- a) Waste acceptance and control procedures
- b) Operational controls and monitoring
- c) Maintenance
- d) Record keeping
- e) Emergency action plans

The site operatives are responsible for the day-to-day operations at the site, including general housekeeping and maintenance.

The Site Manager is able to call upon the services of third party contractors such as road sweepers to deal with specific problems should they occur.

When the Site Manager is on annual leave/sickness, a suitably trained senior member of site staff is assigned the temporary responsibility of Site Manager.

All personnel employed at the site will receive training and instruction on the responsibilities and procedures described in this EMS, and the conditions of the Permit. This will include professional advice from consultants, external training courses and tool box talks. A record will be kept as per the Training Form in Appendix 3.

1.9 Emergency/Accident Situations

For the purposes of this Management Plan an emergency shall be a situation in which there is an imminent danger of:

- i) serious pollution to the environment; and/or
- ii) serious harm to human health; and/or
- iii) the activities authorised become seriously detrimental to the amenities of the locality (ie nuisance).

For the inert waste processing activities undertaken at this site, the Environmental Risk Assessment (Appendix 2) has highlighted dust and mud as the only two nuisance aspects requiring control. These would be classed as low risk.

2. SITE INFRASTRUCTURE

2.1 Site Layout

The site incorporates an open yard with a concrete surface with sealed drainage to foul sewer. Portacabin offices and a weighbridge will be installed, together with storage bays and dust net sheets.

The storage bays will house stockpiles of mixed inert highways waste (pre-treatment), stockpiles of soils/fines and grades of aggregate product (6F2, MOT Type 1). There may also be bulk storage bays for quarry products gravels. See Appendix 4 for site location and layout plans.

Most of the current boundary treatments comprise steel palisade fencing to 1.8m, and these will be supplemented by dust netting to reduce wind speeds across the yard surfaces.

2.2 Site Access

Vehicular access from the main estate road is via secured by lockable gates. The gate shall be locked out of hours or when the site is not manned. Any damage to the gate will be temporarily repaired with permanent repair being effected within 48 hours.

All vehicles will access and exit the site in forward gear; there is no need for tipper wagons to reverse onto the estate access road.

2.3 Site Security

The site is secured at night and the gates locked, and all plant is immobilised. As the yard is part of a larger estate, security arrangements are provided centrally, with only one gated access from Blackburne Street.

2.4 Site Identification Board

A Site Identification Board is prominently displayed at the site entrance. It will maintained so as to be easily readable in daylight hours, and display the following information:

- Site Name and Address
- Permit Reference
- Operator Name
- Emergency Contact Telephone Number (Out of Hours)
- Statement that the site is licensed by the Environment Agency
- EA national contact number
- Opening hours

In the event of damage or defect, the board shall be repaired or replaced within 48 hours.

2.5 Warning Notices

Notices shall be erected and maintained at the entrance to the site warning persons of the danger of trespass, and the appropriate safety provisions for visitors.

2.6 Site Office & Welfare Facilities

The site office and welfare facilities will be provided by portacabins and supplied with power and water. They will be equipped, manned and maintained to allow the requirements of the conditions of Permit to be carried out. Toilet and welfare facilities are also available. First Aid supplies and PPE for operatives will be stored in the site office.

The weighbridge office will house delivery tickets etc and records of incoming and outgoing loads, but DoC waste transfer notes and some plant maintenance records may be kept at the Company's head office.

A notice board is provided at the site office. This will display the EA Permit, the EMS document, Health & Safety Policy, EPOC Certificate, Public Liability Insurance etc.

2.8 Surfacing & Site Drainage

All working areas are concreted (8 inch reinforced) with sealed drainage to foul sewer on Blackburne Street. A silt trap will be installed at the yard to ensure no silt is lost to the sewer network.

2.9 Traffic Restriction Measures

A traffic speed restriction of 5mph is in place.

3. WASTE RECEPTION & STORAGE

3.1 Incoming Waste

The types of waste deposited, stored and processed at the facility currently consists only of dry, inert and excavation waste from the highways maintenance projects.

The waste producers are large utility contractors who are involved with highway maintenance or the installation and reinstatement of service trenches on highways and pavements. The types of materials are therefore sands and clays, and road subbase (stone, concrete etc). Tarmac (bitumen based road planings) may also be present. However, typically, these materials come in as minor constituents of mixed loads. It is important to note that up to 50% of a WRAP-compliant 6F2 product can consist of bitumen, though this is typically <5%. Similarly, the bitumen content of MOT Type 1 aggregate can be up to 50%. If road planings are to be brought in as separate loads the operator will register an S2 exemption for such temporary storage.

Incoming materials are visually checked for compliance at the weighbridge or at the reception area. No materials are brought from sites known to be contaminated.

Roadstone containing *coal tar* (ie as opposed to bitumen) is classed as hazardous waste 170301* due to PAH content, and is expressly not accepted onto site. Waste producers are asked to confirm its absence during pre-acceptance.

3.2 Non-Conforming Waste

Upon visual inspection should any waste not fall outside of the Permit requirements, the load will be immediately rejected from the site. If discrete items are discovered at a later stage (eg gas bottles, tyres etc), a quarantine area will be provided for their temporary storage prior to appropriate disposal elsewhere. Due to the input sources however, this would be a rare occurrence.

3.3 Storage

See Site Layout Plan in Appendix 4.

Maximum permitted waste storage is about 3,000 tonnes. Stockpile heights shall be no higher than 3 metres to reduce dust creation.

Wastes are stored no longer than 2 years.

Recycled aggregates (MOT Type 1, 6F2 etc) are stored in discrete stockpiles awaiting sale.

Anu screened soils will be stored separately awaiting removal offsite.

3.4 Treatment

The proposed treatment is anticipated as being restricted to only the use of grab attachments on the JCB (ie small scale crusher/screener attachments rather than mobile processing plant).

4. SITE OPERATIONS

4.1 Plant & Equipment

The plant and equipment that may be used at the yard will be:

- JCB shovel
- JCB with crush/screen attachment

4.2 Breakdown of Plant & Equipment

In the event of a breakdown of the loading shovel or similar machine, arrangements will be made immediately to remedy repairs using a retained contractor. The date and time of any such breakdown will be recorded in the site diary. If required, an alternative machine will be sourced from a local plant hire company whilst repairs are underway. Should processing capacity be reduced due to such downtime, then waste will be brought to site until the storage capacity is met, and from then it will be taken to alternative licensed facilities in the meantime. A programme of preventative maintenance is employed with all plant to prevent such downtime.

4.3 Spillages

Spill-kits will be available on site, and these will consist of absorbent granules and/or sand. Due to the nature of the waste, the only risk of spillage is hydraulic or fuel leakage from the plant and visiting tipper wagons. Any sizeable spillage or leak, and the subsequent action to clean it up, shall be recorded in the site diary.

4.4 Odours

No odour-causing waste is dealt with at the site and there is no history of odour complaint.

4.5 Control of Vermin

Although no degradable wastes are dealt with, if required a suitable contract will be put in place for a Pest Control Company.

4.6 Control of Litter

No light waste will be dealt with at the site.

4.7 Control of Fires

There will be no burning of waste in any form.

4.8 Control of Dust

Dust may arise from storage (stockpiles), processing activities, transfer loading and/or trafficked yard areas.

See Dust Management Plan.

Any complaints received regarding dust will be investigated immediately and all details, including remedial measures employed, will be logged in the diary.

4.9 Control of Mud

The risk of escape of mud from the site onto the internal estate road is reduced by the whole site being concreted, and the focus of operations on hardcore and aggregates rather than soil. However, the cleanliness of the site entrance is controlled by:

- manual sweeping of concrete apron at entrance
- hiring of road sweeper when necessary

4.11 Control of Noise & Vibrations

The processing of the materials will be sporadic (maybe 3 hours per day) and will be undertaken by small attachments to the JCB. As such, noise will be limited to the usual loading and unloading of materials and will be infrequent. The noise/vibration profile of the site will be little different from the historical use of this yard (civil engineering/ open storage) or that of the surrounding yards. As such, no issues from noise or vibration are anticipated.

5. RECORD KEEPING

5.1 Waste Movements

The Site Manager will keep a daily record of all incoming/outgoing waste materials, to include:

1. Weight and type of waste material(s) comprising each load (inc. EWC)
2. Registration number of vehicle
3. Destination point or disposal site outgoing stock or waste
4. Date & time of removal from the site

Duty of Care (DoC) waste transfer notes (typically season tickets) are held at the Company's administrative headquarters for security purposes. Copies of such can be made available on request.

5.2 Site Diary

A Site Diary will be maintained in the site office. This diary is used to record a daily log of events relating to the operation of the site and includes details of site inspections, complaints received, breakdowns, spillages, fires, rejected loads, emergencies, abnormal events and action taken, problems with waste received and actions taken, damage to fencing, gates, hard surfaces, bunds and storage bays, servicing of silt trap and drainage etc. Information included in Site Inspection Form in appendix 3. The diary will be kept up-to-date and will be made available for inspection by the Regulator.

5.3 Visitors Book

All visitors must report to the site office upon arrival and sign the Visitors Book.

5.4 Accident Book

The Accident Book is to be kept in the main office. All accidents must be reported at the earliest opportunity and the Site Manager informed. Requirements under RIDDOR will be observed where appropriate.

Appendix 1: Emergency procedures

INTRODUCTION

It is not possible to remove completely the possibility of accidents at waste transfer stations. In all such cases it is important that corrective action be taken immediately to reduce the danger to site personnel and site visitors. It is not possible to foresee every eventuality but this procedure:

- Lays down the principles to be applied in case of emergency
- Lists immediate actions that should be taken in certain situations
- Lists secondary actions to be considered as soon as immediate actions have been taken

The content of this document will be reviewed on a regular basis, in light of experiences and as and when further changes are made at the site.

EMERGENCY FIRE PROCEDURE

- Assess the risk to personnel and site.
- Summon Fire Service if in any doubt about ability to extinguish fire.
- Summon Ambulance Service if required.
- Clear the site of 3rd parties; clear vehicles from site only if it safe to do so.
- Arrange for emergency services to be admitted, ensuring an unobstructed route and clear directions to fire.
- Ensure full roll-call of all personnel is taken and all personnel on site are accounted for.
- Direct fire fighting operations using fire hose/extinguisher, if appropriate, without risk to self.
- Assess actual or potential effect on plant and property and instruct any necessary actions to make safe.
- Co-ordinate with Fire Service Senior Officer on arrival ensuring he is aware of special risks (e.g. gas bottles, electrical supply, waste oils, etc).
- Evacuate the site if required or asked to do so by Emergency Services.
- Advise Site Manager if he is not present.
- Advise Environment Agency to inform of site fire.
- Record spillage in site diary.

EMERGENCY SPILLAGE PROCEDURE

- Assess extent of spillage, type of material and determine action required.
- Direct operations if applicable, without personal risk.
- All leaks/spillages can be dealt with by site personnel- professional services should not be necessary.
- Spill kits are available on site; the sand and absorbent granules of which should be used to contain and soak up any liquids.
- Once the spill has been absorbed, the spent absorbent will be collected and containerised for disposal, ensuring proper labelling, etc, as appropriate.
- No spillages are to be washed down any drains.
- Advise Site Manager if he is not present.
- Record spillage in site diary.

A spillage kit will be provided on site that will contain absorbent materials etc.

ACCIDENT - INCLUDING MAJOR INJURY

- Go directly to site of accident and assess any further risk to personnel and determine action required.
- If required summon Ambulance Service.
- Arrange for emergency services to be admitted via main gate, ensuring an unobstructed route and clear directions to incident.
- Direct rescue operations if applicable, without risk to self.
- Assess actual or potential effect on operations and instruct any necessary actions to make safe.
- Co-ordinate with ambulance service upon arrival, give them as much information as possible about the accident, inform them of any special risks (e.g. electrical supply, gas bottles, etc).
- Advise Site Manager if he is not present.
- Record incident in site diary.

Appendix 2: Environmental Risk Assessment:

Information				Judgement				Site Specific Assessment & Actions	
Receptor	hazard	consequences	pathway	likelihood	amplitude	Overall risk	Note	Risk management & justification	Residual risk
Local human population	Airbourne dust & particulates	Respiratory irritation & illness	Inhalation of particulates; bioaerosols	medium	medium	medium	Potential for frequent and long term exposure if anyone is living or working close to the site (apart from the licence holder/ operator and employees.	No residential property within 500m Enclosed nature of storage in bays Dust suppression in use. Daily visual checks by management.	low
		Nuisance-dust on cars, clothing etc	Deposition from air	medium	low	medium	Potential for frequent and long term exposure if anyone is living or working close to the site (apart from the licence holder/ operator and employees.	No residential property within 500m Enclosed nature of storage in bays Dust suppression in use. Daily visual checks by management.	low
	Airborne asbestos fibres	Respiratory illness i.e. lung cancer and mesothelioma	Inhalation of fibres	low	high	low		No asbestos permitted. Strict acceptance and rejection policy.	low
Local human population	Fugitive releases, litter.	Nuisance, loss of amenity.	Air transport	Low	Low	Low	Local residents often sensitive to litter, and likely to complain, especially if it is a new facility.	No light waste brought to site.	low
Local human population	Noise from machinery	Nuisance, loss of amenity, loss of sleep.	Air transport.	Medium	Low	Medium	Local residents often sensitive to noise, and likely to complain, especially if it is a new site.	Established industrial location with history of use. No residential property within 500m. Standard noise abatement on all plant. No high impact activities on site	low
Local human population	Scavenging birds and animals	Nuisance, loss of amenity	Air transport and over land	Low	Medium	Low	Transfer operations may contain wastes that attract pests. Inert wastes stored may become nesting/breeding sites.	No putrescible waste on site- all inert.	low

	Pests (e.g. flies)	Nuisance, loss of amenity	Air transport and over land	Low	Medium	Low	Insect pests can multiply on permitted waste types particularly in summer months.	No putrescible waste on site- inert only.	low
Local human population	Odour	Nuisance, loss of amenity	Air transport	Low	Medium	Low	Local residents often sensitive to odour and likely to complain	No putrescible waste on site	low
Local human population	Fugitive releases, waste, litter and mud on local roads	Nuisance, loss of amenity.	Vehicles entering and leaving site	Medium	Medium	Medium	Local residents often sensitive to mud on roads, and likely to complain, especially if it is a new site	Inert waste only. No PrOW nearby. Trafficked surfaces are concrete Manual brushing of entrance. Hire of road sweeper as necessary.	low
Local human population	Flooding of site located in floodplain	If waste is washed off site it may contaminate buildings/gardens/natural habitats downstream	Flood waters	Low	Low	Low		N/A- not located in flood zone according to EA website.	low
Local human population and/or livestock gaining unauthorised access to the activities	All on-site hazards – particularly relating to waste handling and storage activity	People/livestock coming into contact with hazards.	Direct physical contact	Medium	Medium	Medium	Waste types are non- hazardous therefore only a medium magnitude	Inert wastes only. Site secured during out of hours.	low
		Arson and/ or vandalism causing the release of polluting materials	Arson – air. Liquids polluting watercourses and/or groundwater	Medium	Low	Low	Waste types are non-hazardous therefore only a medium magnitude	No liquid wastes on site. Any Diesel/oil for plant to be stored in drums in secure lockable unit. No fires permitted on site.	low
Surface waters adjacent to site. All river quality objective categories and SSSIs	Contaminated run-off from non-hazardous waste (leachate) and from inert waste (containing suspended solids)	Acute effects: oxygen depletion, deterioration in water quality, fish kill, algal blooms	Direct run-off from site, across ground surface, via surface water drains, ditches etc.	Low	Medium	Low	Potential for contaminated run-off from stored non-hazardous wastes.	Inert waste only. No leachate source. Mersey estuary is located 58m to the SW but site drainage is sealed and to foul sewer on Blackburne Street. No other watercourses within 500m	low
		Chronic effects, deterioration of water quality	Indirect run-off via the soil later.	Low	Low	Low	Likely to be small quantities of contaminated run-off reaching	As above	low

							watercourse. Harm is temporary and reversible.		
Abstraction from watercourse downstream of site (for agricultural or potable use).	Contaminated run-off from non-hazardous waste (leachate) and from inert waste (containing suspended solids)	Acute effects, closure of abstraction intakes	Direct run-off from site, across ground surface, via surface water drains, ditches etc.	Low	Low	Low	Watercourse must have medium/high flow for abstraction to be permitted. Contaminated run-off will be diluted.	No release to surface waters. No drainage connections to surface waters.	low
Groundwater	Contaminated run-off from non-hazardous waste (leachate)	Contamination of groundwater	Soil to groundwater to borehole	Low	Medium	Medium	Waste transfer operations unlikely to produce significant quantities of leachate	No leachate source on site. Inert waste only.	low
Groundwater and surface waters	Fire on site leading to run-off from polluted fire fighting waters.	Contamination of groundwater and aquatic ecosystems	Direct and indirect run-off	Medium	High	Medium	Risk of deliberate or accidental combustion of waste is moderate	No flammable waste stored. 24hour site security on whole estate No drainage connections.	low
Local human population	Smoke from burning of waste	Nuisance, loss of amenity, loss of sleep. Respiratory irritation/illness.	Air transport	Medium	Medium	Medium	Risk of deliberate or accidental combustion of waste is moderate	No fires permitted on site.	low
European site (protected habitat – SPA or SAC) within 1 km of site	Any	Potential deterioration of designated habitat	Any	Low	Medium	Medium	No routine releases to air or water.	SSSI/RAMSAR/SPA in close proximity to South West (Mersey Estuary) See Habitats Assessment document submitted with Permit Application.	low

Appendix 3: Records & Forms

- **Site Inspection Form**
- **Complaints Procedure**
- **Training Form**
- **Maintenance Checklist**
- **Accident/Incident Record**

Title	Site Inspection Form
number	

Date:	Weather conditions:
Auditor:	

Item	Check	Comments
Site fences & gate		
Permit & management plan		
Staff levels		
Waste types		
Stockpile heights <3m?		
Site diary complete		
Quarantine area contents		
Drainage/silt trap obs		
Safety signs in place		
Mud at entrance/roadway		
Dust observed at downwind boundary?		
Mobile Plant in Operation		
Fuel Storage		
PPE stocks		
First aid kit		
Complaints?		

General comments and actions to be taken:

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Complaints Record:

Details of Complainant Name	
Address	
Phone No.	
Date & Time of Complaint	
Nature of Complaint	
Who else was aware of the complaint?	
What caused the problem?	
Actions taken to prevent reoccurrence	
Was there any significant pollution or nuisance caused (eg dust, odour, noise, spills)?	
Have you informed the Environment Agency (0800 807060)?	When? Who?
Have you written to the local EA office? (EA, Richard Fairclough House, Warrington).	Y/N Date?
Print & Sign your name:	

Training Record:

	<i>Manager</i>		<i>Foreman</i>		<i>Operatives</i>	
	Required?	Date provided	Required?	Date provided	Required?	Date provided
Technical Competency	Y		-		-	
Permit Awareness	Y		Y		Y	
General Health& Safety	Y		Y		Y	
Receipt/Rejection of Waste	Y		Y		-	
Plant Maintenance	Y		Y		-	
Emergency Procedures	Y		Y		Y	
WRAP Protocol	Y		Y		-	

Maintenance Checklist (environmental protection infrastructure):

Item requiring maintenance	Frequency						Who is Responsible?
	daily	weekly	monthly	annually	2 yearly	5 yearly	
Concrete Surfacing			Y				
Gates/fencing/walls	Y						
Dust Netting	Y						
Drainage/ silt trap		Y					

Accident/Incident Record:

Date & Time of Incident	
What happened?	
Who else was aware of this?	
What caused it?	
What has been done to prevent reoccurrence?	
Was there any significant pollution or nuisance caused (eg dust, odour, noise, spills)?	
Have you informed the Environment Agency (0800 807060)?	When?
	Who?
Have you written to the local EA office ? (EA, Richard Fairclough House, Warrington).	Y/N
	Date?
Print & Sign your name:	

APPENDIX 4 SITE LOCATION & LAYOUT PLANS

SITE LOCATION



SITE LAYOUT

