OPERATING PROCEDURES
EMS-OP-01

Version 2, dated 6 November 2025

Environmental Permit

Land at Croft Quarry
Marion's Way
Coventry Road
Leicester
LE9 3GP

regeneration ltd SUSTAINABLE MATERIAL SOLUTIONS	**Operating Procedures**		
Document Reference: EMS OP 01		**Issue Number: 2**	**Issue Date 6.11.2025**

DOCUMENT CONTROL SHEET

Version Reference	Date	Reason for Change	Issued by
1	05.06.2025	Permit Application	ISL
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1 INTRODUCTION

1.1 Purpose

The purpose of these procedures is to guide staff and contractors in the safe conduct of their duties in a manner which controls the environmental impacts of the company's operations. The procedures cover normal operations on site and should be read in conjunction with the Emergency Operational Procedures.

It provides a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints.

The Operational Procedures have been developed with reference to the relevant Appropriate Measures.[1] A separate BAT report has been prepared.

1.2 Structure of Environmental Management System

This EMS structure will be as follows:

Operational Procedures: The documents which describe how the site operations will be run, under normal conditions and emergency conditions when there is an incident. All these documents have file names starting EMS/OP.

EMS/OP/01	Operational Procedures
EMS/OP/02	Emergency Response Plan
EMS/OP/03	Dust and Emissions Management Plan

Forms and Records – the documents on which information is recorded. All these documents have file names starting EMS/FR.

EMS/FR/01	Waste Acceptance Form
EMS/FR 02	Sub-Contractor Form
EMS/FR/03	Waste Rejection Form
EMS/FR/04	Daily Checks
EMS/FR/05	Incident/Complaint Form
EMS/FR/06	Planned Preventative Maintenance
EMS/FR/07	Training

[1] Chemical waste: appropriate measures for permitted facilities - Guidance - GOV.UK

1.3 Roles and Responsibilities

The Directors have responsibility for ensuring these procedures are adhered to which includes communication with staff and contractors, and the provision of adequate training.

The Directors are responsible for updating and re-issuing these procedures as necessary and ensuring all staff are trained in new procedures.

All staff, operatives and suppliers interacting within the Croft Quarry Depot are required to comply with the requirements the EMS.

1.4 The Company

OCL Regeneration specialise in sustainable building materials and recycled construction materials, serving the following sectors:

- Road construction and surfacing contractors
- Utility providers and contractors
- Construction contractors

These generate similar waste materials through road and pavement construction or reinstatement following upgrades/repairs to underground services and construction developments.

The company has developed safe working practices for managing Asphalt Waste Containing Coal Tar (AWCCT), to ensure that it is encapsulated for re-use.

The company has achieved ISO14001 and 9001 accreditation. They also have the following:

- The Contractors Health and Safety Assessment Scheme (CHAS)
- Construction Plant Compliance Scheme (CPSC)
- Green Roads Alliance
- Construction Products Association (CPA)
- National Plant Operators Registration Scheme (NPORS)

OCL Regeneration is part of the Holcim Group.

1.5 Scope

These Operational Procedures cover:

- The storage and treatment of hazardous waste

Hazardous waste operations are limited to recovery of waste coal tar bound road planings for re-use in road construction.

The procedures cover the activities carried out at:

Land at Croft Quarry
Marion's Way
Coventry Road
Leicester
LE9 3GP

The site is within the Croft Quarry Complex. There are shared facilities including the weighbridge. The site will fall within the security measures of the wider quarry site. Croft Quarry is within the ownership of Aggregate Industries, which is also part of Holcim.

1.5.1 Permitted Waste Management Operations

The permitted activities will cover those set out in Table 1.

Table 1 Permitted Activities

Activity	Description of specified activity	Description	Limits of specified activity
A1	Section 5.3 Part A(1)(a)(vi) Recovery of hazardous waste with a capacity exceeding 10 tonnes a day involving recycling or reclamation of inorganic materials	Physical treatment of hazardous waste. R5: Recycling/reclamation of other inorganic materials.	Treatment consisting of separation, screening, crushing, blending and mixing of waste for recovery as an aggregate. All waste shall be stored and treated on impermeable ground with sealed drainage.
A2	Section 5.6 Part (A)(1)(a) Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in Sections 5.1, 5.2, 5.3.	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)	Storage of hazardous asphalt waste containing coal tar. All waste shall be stored and treated on impermeable ground with sealed drainage.

1.6 Management System

These procedures are part of OCL Regeneration Ltd's Management System. The Management System covers all aspects of operations and aims to effectively manage the impacts of the business on the environment including the health and safety of staff. The key documents include:

a) Policies: Environmental and Health & Safety

b) Documents: Procedures to set out how to undertake operations and checking for any issues.

c) Forms on which to record information and provide evidence of the system functioning properly.

The company has achieved the following certified management systems:

- BSI 9001:2015 Quality Management System
- BSI 14001:2015 Environmental Management System

The Operational Procedures will cross reference procedures and reporting forms within the main Quality and Environmental Management Systems.

The compliance with BS14001 shows the company's commitment to environmental performance. The certified EMS is compliant with the General Management Appropriate Measures (Section 2.1).

2 MANAGEMENT OF OPERATIONS

The following procedures will be implemented by staff and contractors under the responsibility of the Depot Manager.

These procedures cover normal operations. EMS-OP-02 provides the Emergency Response Plan.

2.1 Site Layout and Signage

The boundary of the permitted area is shown on Drawing No. OCL-CQ-EP-01. A Site Layout Plan is shown on Drawing No OCL-CQ-LAY-01. All waste operations will be carried out on an impermeable surface with sealed drainage.

At the entrance to the site, a sign board will display the following information:

- Permit holder's name
- An emergency contact name and the Operator's telephone number
- A statement that the site is permitted by the Environment Agency
- The permit number
- Environment Agency national numbers, 03708 506506 and 0800 807060 (incident hotline)

The sign will be kept in good order to ensure it is legible.

A notice board will be maintained in the site office. A copy of the Environmental Policy and the company's Health and Safety Policy will be displayed, together with any other relevant notices. A copy of this document and the Environmental Permit will be kept in the site office.

The site is wholly within the confines of the Aggregate Industries Croft Quarry Complex. Both Aggregate Industries and OCL are part of the Holcim Group.

2.2 Security

The site will be within the security control of the wider quarry estate. CCTV is provided throughout the estate including the access road.

The site will be protected by CCTV security. The locations of the CCTV cameras are shown on the site plan.

There will be a third party security contractor responsible for monitoring the site remotely. The security company will have access to the CCTV system. There are also motion detectors around the site. If the alarm system is activated, it will notify the security company, who in turn can access the CCTV and carry out a site visit.

The site is likely to be manned at all times in any event.

The Depot Manager will be responsible for ensuring it is in working order. The security measures will be inspected daily according to the Site Daily Checks Form EMS-FR-04.

2.3 Incidents and non-conformances

All incidents and non-conformance will be reported to the Depot Manager who will investigate the incident and complete an Incident Report Form EMS-FR-05. Non-conformances relating

to non-permitted waste will be specifically recorded on the Waste Rejection Form EMS-FR-03.

Incidents include complaints from the public, any observations that mean procedures are not being adhered to or accidents such as spillages. This procedure does not replace the reporting of health and safety incidents which fall under the scope of the Health & Safety policy and procedures for the site.

2.4 Technical Competence and Training

2.4.1 Site Operations

The company structure is set out in the Integrated Manual. The manual provides the roles and responsibilities of the senior management structure. The site based structure is set out below.

The day-to-day operations are overseen by a Technically Competent Manager (TCM). There will also be a Depot Manager to oversee the day-to-day operations. The TCM will be responsible for ensuring the requirements of continued competency is met. A copy of the Certificate will be kept at the site office.

The Depot Manager will be responsible for the control of incoming and outgoing vehicles, checking Duty of Care documentation, keeping and maintaining all computerised records, checking in all visitors to the site, issuing Health & Safety instructions and reporting any complaints to management.

All personnel will have access to a copy of the Environmental Permit and these Operational Procedures. Prior to site operations, the induction will introduce staff to the site specific controls and this EMS.

All staff will be trained to a standard which enables them to perform the responsibilities described above and the detailed role as set out in job descriptions.

A record of staff training will be kept for each staff member which includes inductions to new processes and procedures as needed. EMS-FR-07.

The following training matrix will be adopted to guide training needs. This has been based on the RACI system (Responsible, Accountable, Consulted and Informed).

Training	**Depot Manager TCM**	**Production Manager**	**Site Operatives**	**Mobile Plant Operatives**	**Office Staff**
Induction	R	C	I	I	I
H&S: • Manual Handling • First Aid • Accidents/Injury/near miss reporting • Accident Book • Motor Accident reporting • PPE	R	I	I	I	I
Accident Investigation	R	C	C	C	-
Accidents and Emergency	R	C	I	I	I
Risk Assessment	R	C	-	-	-
Fire Safety	R	C	I	I	I
Spillage Procedure	R	A	A	A	-
Plant Daily Checks	I	I	-	R	-
Plant Maintenance	R	C	-	I	-
Plant Training	R	A	-	I	-
Site Daily Checks	R	I	I	I	-
Manual Handling	R	C	I	-	I
Vehicle marshalling	R	-	I	I	-
First Aid at Work	R	R	I	I	I
Waste Identification and specific handling	R	A	C	C	I
Environmental Permitting: • Operational Procedures / Emergency Procedures • Waste Acceptance • Amenity Management (noise, odour and dust) • Complaint Procedure • Non-Conformance	R	C	I	I	I

All sub-contractors will be notified of the site rules and records will be kept of all sub-contractors using form EMS-FR-02.

2.4.2 Depot Manager/TCM Responsibilities

The TCM and Depot Manager roles are interchangeable. The Depot Manager/TCM reports to the Senior Management Team. The Depot Manager/TCM is also responsible for:

- Investigating any incidents or non-conformances or complaints in accordance with the relevant procedures and reporting forms.
- Ensuring that required data is provided to the Environment Agency at the agreed frequency.
- Daily site checks in using EMS FR 04 Daily Checks Form.
- Ensuring site maintenance is completed in accordance with these procedures.
- Ensuring all drivers are familiar with the site rules and understand that the driver has a duty to comply with them.
- Ensuring all operational station staff receive a suitable induction to the site and have had the relevant training for the mechanical and electrical elements of plant.
- Ensuring all staff are familiar with safe operation of all necessary aspects of the site, relevant to their specific roles.

2.4.3 Site Operative Responsibilities

It is the responsibility of Site Operatives to:

- Act in accordance with the instruction given to them from the Depot Manager/TCM.
- Follow these operational procedures for all stages of waste handling.
- Report any incidents or non-conformances to the Depot Manager.
- Ensure all equipment used on site is checked before use each morning for signs of wear and tear which could compromise health and safety or environmental protection. Use Daily Vehicle Check Form. All issues noted with equipment or the condition of the site must be reported to the Depot Manager immediately, before the equipment is used.

2.4.4 Driver Responsibilities

It is the responsibility of all drivers to:

- Comply with the site rules:
  - Observe a 10 mph limit.
  - Comply with signals and instructions given by site operatives.
  - To ensure that the correct PPE is worn at all times when not in the vehicle.
  - Be aware of other vehicles, plant and pedestrians.
  - Be made aware of any unusual activities on site which may affect them.
  - Make sure visiting drivers and loaders know of the consequence of failing to abide by the site rules.
  - Carry out daily vehicle checks and inform the TCM immediately of any defects.
- Comply with signals and instructions given by the Depot Manager or other site operatives.

- Comply with no entry signs and barriers.

2.4.5 Training

The Technically Competent Manager has achieved WAMITAB Level 4 High Risk Operator Competence for Managing Physical and Chemical Treatment of Hazardous Waste. This is considered appropriate for overseeing all operations at this site.

The site staff will be trained and instructed in the procedures required to operate the site and will be aware of the waste types accepted as well as having an understanding about the Environmental Permit.

The site will always be manned and supervised when waste operations are in progress.

A record of al training will be recorded using form EMS-FR-07. The training needs checklist includes:

- Environmental Awareness
  - Permit role and responsibility
  - Waste Receipt including Duty of Care
  - Waste Treatment and Storage
  - Risk Assessment and awareness of local sensitive receptors
  - Permit conditions and non-conformances
- Maintenance/Operations
  - Maintenance of cold foam treatment plant
  - Maintenance of silos and storage tanks
  - Maintenance of plant and machinery
  - d) Maintenance of bay walls and concrete floor
- Accidents and Emergency
  - Fire
  - Spill response
  - Failure of services

The training and competency requirements are compliant with the General Management Appropriate Measures (Section 2.2).

2.5 Site Records

The Depot Manager is responsible for ensuring the maintenance of site records.

2.5.1 Security and Availability of Records

A record of the types, quantities and dates of wastes deposited on the site will be maintained and provided to the Environment Agency at three-monthly intervals, within one month of the end of each period.

A copy of all records including transfer notes, consignment notes (if necessary) and weighbridge will be maintained in the site office.

The waste tracking system will include the following information. This will be set up for each new job and assigned a unique reference number.

- Pre-Acceptance waste information (basic characterisation)
  - Analysis (if required)
  - Producer details (waste source)

- The quantity of waste
- The form of waste (i.e. solid)
- Code according to the European Waste Catalogue
- For hazardous waste loads, determination of the wastes hazardous properties as per Environment Agency Technical Guidance WM2 'Hazardous Waste : interpretation of the definition and classification of hazardous waste' (2011) and WM3 'Waste Classification : Guidance on the classification and assessment of waste' (2015)
- The process producing the waste, including the SIC code, the characteristics of its raw materials and products which may affect its behaviour
- Appearance of the waste (smell, colour, physical form)
- Information to demonstrate that the waste is not prohibited
- Any special handling requirements
- Anticipated Delivery date

- Waste Arrival checks
  - Waste Transfer Notes/Consignment Note
  - Weight (quantity)
  - Visual check using CCTV
  - Date of Arrival
  - Any rejection procedures
- Storage
  - Storage volume of waste waiting to be treated
  - Storage volume of raw materials
  - Storage volume of materials waiting to be dispatched from site
  - Volume of waste in quarantine area
  - Daily site checks: integrity of the storage bays, damage and repairs.

- Final Sign-Off
  - Destination of waste
  - Destination of products
  - Records stored for 3 years

The weighbridge uses computer software to record the information required to complete the Duty of Care checks. There is also a capacity register that is maintained daily to keep a record of the amount of material on site.

All records will be stored in the site office, away from the operational activities. The site office provides a secure storage area. Back-up copies of computer records will be kept electronically at the company Head Office.

2.5.2 Site Diary

The site diary will be maintained and updated to include the following: -

- Start and finish of daily waste management activities on site (operational hours)
- Maintenance

- Breakdowns
- Emergencies
- Problems with waste delivered and action taken
- Site inspections and consequent actions carried out by the operator
- Technically competent management attendance on site; the date and the time onto site and the time left site
- Weather conditions
- Complaints about site operations and actions taken
- Environmental problems and remedial actions

The site diary will be kept in the site office and updated daily. If further information is required, the relevant form will be completed. For example, if the site receives a complaint, the site diary may be completed with outline information and form EMS-FR-05 will be completed with full details.

2.6 Inspection and maintenance

The Depot Manager will be responsible for inspecting the storage areas and preventative maintenance will be undertaken according to the Site Daily Checks Form EMS-FR-04.

Plant and machinery on site are visually inspected by the operator before use as part of risk management and health and safety. This is covered in training for plant operatives. Each vehicle contains a Defect Form. This is completed each day before use. The forms are carbon copied to allow one copy to be filed in the office and one remaining in the vehicle. Any defects are reported to the Depot Manager.

In addition to scheduled preventative maintenance of equipment and machinery, in accordance with legal requirements or manufacturer's recommendations, reactive maintenance will be carried out if needed in accordance with inspection findings. This will be recorded in the site diary.

Site based infrastructure will be checked as follows:

Equipment	Maintenance Frequency	Responsibility
Depot Weighbridges	Annual	Depot Manager
Drainage Interceptors	6 monthly	Depot Manager
Diesel Fuel Pumps	Annual	Depot Manager
Depot Loading Shovel	6 monthly	Depot Manager
Mobile Plant	As per manufacturers Specifications	Depot Manager

2.7 Accidents/Incidents/Non-Conformance

A separate Accident Management Plan has been prepared (OCL-CQ-ERA-V1). This deals with the General Management Appropriate Measures (Section 2.3).

The site will be secured to prevent unauthorised access.

The site will handle a specific waste stream, derived from a specific source. All testing will be carried out prior to acceptance. The AWCCT will be removed from the source site and transferred directly to the permitted site. The likelihood of contamination or receiving non-compliant waste is very low.

Any loads arriving at the facility which contain non-permitted wastes, or a significant amount of contrary material will be rejected prior to unloading. In the unlikely event that a vehicle inadvertently deposits non-permitted waste or a large amount of contrary material, it will be re-loaded where possible. Should the vehicle have already left the Facility, the non-permitted waste or contrary material will be stored in a quarantine area of the site or a sealed skip, pending removal of the material to the waste producer or authorised facility. Any non-permitted hazardous and non-hazardous will be stored in separate quarantine areas or sealed skips.

Material rejected from the facility will be issued with a record stating why, when and from which contract the waste was derived from. This record will be held at the Facility for the Environment Agency to inspect. Form EMS-FR-03 will be completed.

Small amounts of contrary material present in any incoming loads will be removed by hand or machine and temporarily stored in the appropriate quarantine skip pending removal from site to a suitably permitted facility. A loading shovel or excavator will be used to move larger items.

Wastes that are malodorous or liquid are not permitted and will not be accepted at the Facility.

Any accidents, incidents or non-conformance will be investigated by Senior Site Management. The outcome of any investigation will be reported to the appropriate authorities and to site staff. This will be followed by a training session for site staff, where the incident is described in detail and staff work through the preventative and corrective actions.

2.8 Inspections and Audits

Depot compliance and environmental performance at this site will be assessed, recorded and reported at regular intervals. Regular checks will ensure that any issues are flagged at the earliest opportunity and corrective actions are taken where required.

OCL carry out Management Reviews on an Annual basis. The agenda includes matters relating to the Environmental and Quality Management Systems.

As part of the certified management systems, OCL carry out internal audits.

For the operations at Croft Quarry the following will be undertaken:

Depot Manager or TCM from OCL inspections of the depot are to be carried out monthly. These monthly inspections will be recorded within the site dairy.

The outcome of these inspections will form part of OCLs annual management review. If a significant matter is identified, the matter will be discussed by the management team at the monthly team meeting.

2.9 Review

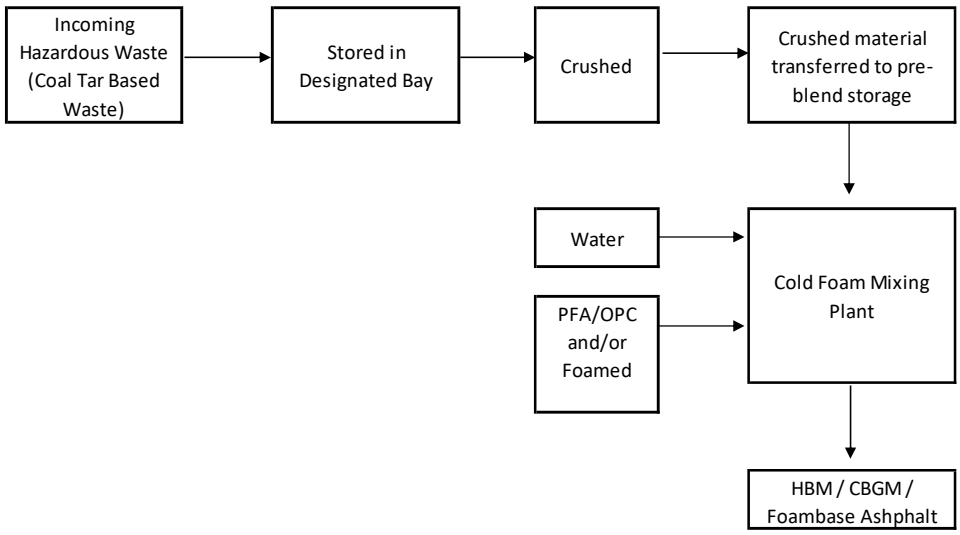
These Operational Procedures will be reviewed on an annual basis, or sooner if there are any changes to the operation or there has been incident, recurring complaints, or breaches to the Environmental Permit.

3 WASTE HANDLING PROCEDURES

The principal operations at the site are:

- Tar Based Aggregates Recycling - Asphalt containing coal tar will be stockpiled until sufficient volumes are available to be manufactured into Hydraulically Bound Materials (HBM), Cold Recycled Bituminous Materials (CRBM), Cement Bound Mixtures (CBM) onsite and subsequently used on highway improvement schemes.

The generic process flow for the activity is shown in below:



3.1 Pre-Acceptance Procedures

3.1.1 Waste Acceptance Details

The waste facility will receive and treat Asphalt Waste Containing Coal Tar (AWCCT) which is hazardous waste. The process that produces the waste is clearly defined. AWCCT has the following waste code:

EWC Code	Waste Description	Permitted Quantities
17 03 01*	Bituminous mixtures containing coal tar	Total combined maximum quantity of waste accepted at the site shall be no more than 150,000 tonnes per annum with no more than 23,000 tonnes to be stored in total at any one time

Historically, coal tar was commonly used as a binder in asphalt road surfaces throughout the 1970's and 1980's. Due to the high concentrations of phenols and polycyclic aromatic hydrocarbons (PAH's) in coal tar bound asphalts, such materials are classified as hazardous waste with the EWC of 17.03.01, 'bituminous mixtures containing coal tar'. Highway maintenance and improvement works on stretches of highway laid down during or preceding the 1980's can generate AWCCT.

Waste pre-acceptance procedures will ensure that only compliant waste types will be accepted. Customers delivering waste to the site will be required to provide OCL Regeneration Ltd, in advance, with all relevant/necessary information/documentation to satisfy the requirements of the Duty of Care.

Information required will include specific details of:

- Source and origin of the waste
- The quantity of waste
- Code according to the European Waste Catalogue
- For hazardous waste loads, determination of the wastes hazardous properties as per Environment Agency Technical Guidance WM2 'Hazardous Waste: interpretation of the definition and classification of hazardous waste' (2011) and WM3 'Waste Classification: Guidance on the classification and assessment of waste' (2015)
- The process producing the waste, including the SIC code, the characteristics of its raw materials and products which may affect its behaviour
- Appearance of the waste (smell, colour, physical form)
- Information to demonstrate that the waste is not prohibited

To enable the identification of tar bound layers, core logging of the stretch of road is carried out in-situ prior to the highway excavation works. This enables an accurate identification of hazardous wastes and allows the Waste Producer to excavate hazardous and non-hazardous wastes separately and avoid mixing the waste streams. A chemical indication process is applied to each layer of the core both vertically and horizontally allowing the Waste Producer to detect the presence of tar. This method will be validated and verified by a UKAS accredited laboratory.

This is a proven methodology for identifying the tar bound layers. The producer must provide this information to OCL, together with a written description. OCL can arrange for this work to be carried out if required. This work does not rely on product data sheets. Testing is required for each new job.

The pre-acceptance procedures require that waste loads are accepted from approved customers only. Loads of AWCCT (17.03.01 'Bituminous mixtures containing coal tar') will only be accepted from customers who have chemically tested the waste load for the presence

and composition of contaminants, prior to delivery. A copy of the test survey and laboratory report will be required before any pre-acceptance is approved. Any waste loads arriving at the site that have not been tested will be rejected and refused entry.

Where the constituents of the waste are not known, OCL will arrange for a sample(s) of the waste to be analysed. Any sampling will be undertaken by trained personnel and sent to a laboratory for analysis. OCL will work with a laboratory to provide all their compliance testing. The sample(s) must representative. The laboratory will classify the waste in accordance with WM3. The laboratory will provide the appropriate containers for the analysis and confirm the chain of custody requirements.

All site investigation reports, and chemical analysis will be sent to the laboratory for approval. The laboratory will confirm that the information is provided is sufficient to classify the waste. If necessary, further, specific testing may be requested at this stage. The producer of the waste will be notified of this and if necessary, OCL will arrange for further testing to be carried out.

All pre-acceptance information will be recorded and given a unique reference number. This information will be reviewed by the Technically Competent Manager, who will then initiate the following checks.

If the assessment has shown that the waste is suitable for treatment, the customer and project will be set up on the booking system. The project will be given a unique reference number, to provide full traceability from collection, storage, treatment and transfer. The documentation relating to the site characterisation will be stored in each project file. This will be used for verification purposes.

All records relating to pre-acceptance will be kept for at least 3 years. The records will be kept at the main office.

All vehicles delivering waste to the site will be checked to establish whether the haulier is a Registered Waste Carrier or has a valid exemption from registration. Only registered carriers or those who are lawfully exempt from registration will be permitted to use the site. The weighbridge software is set up to carry out these checks.

Waste will not be accepted if there is insufficient storage capacity available. This is to ensure that all waste is managed effectively to prevent pollution or loss of amenity. There is also a clear method of treatment and after use to ensure that the site will only accept waste that it has capacity to manage.

Every delivery of waste will be recorded, detailing the date of the transaction, volume, waste type, Registered Waste Carrier, Hazardous Waste Consignment Note number, vehicle registration and any other relevant information against a unique reference number. This will allow for tracking of wastes, the generation of reports and waste returns, as well as providing comprehensive, auditable information.

All relevant documentation will be maintained at the site office. Information will be made available for inspection by officers of the Environment Agency.

Site staff will be suitably trained to understand pre-acceptance documentation.

Once the waste has been accepted for delivery, it will be assigned a unique reference number. All records relating to pre-acceptance will be maintained at the site for cross-reference and verification at the waste acceptance stage. The records will be kept for a minimum of 3 years.

All staff involved in the business have experience of utility waste production. Therefore, sales staff are fully aware of the technical requirements for handling the waste. However, only technical staff will confirm the acceptability of the waste and will report their findings to the sales staff.

Form EMS-FR-01 will be used for the pre-acceptance checks.

The site will only manage one waste stream. There is a negligible risk of explosions, corrosion, uncontrolled reactions or gas production.

This complies with Waste pre-acceptance, acceptance and tracking appropriate measures (Section 3.1).

3.2 On Site Waste Acceptance

The only wastes which have been subject to the pre-acceptance procedures detailed above will be accepted at the site.

All loads must be sheeted/enclosed at the point of arrival. The vehicle will be weighed, and the driver will provide information to the site office, this will include the Hazardous Waste Consignment Note. The delivery of the load will be pre-arranged. Therefore, the correct paperwork from the pre-acceptance stage will be readily available. Only pre-booked waste will be accepted.

Waste Acceptance Procedures will be overseen by the Technically Competent Manager, who has achieved WAMITAB Level 4 High Risk Operator Competence for Managing Physical and Chemical Treatment of Hazardous Waste. All staff will receive training on the waste acceptance procedures A site operative will inspect the details on the Hazardous Waste Consignment and compare the information to that in the pre-acceptance documentation already received (including laboratory results), six figure European Waste Catalogue Code and against the waste types permitted by the Environmental Permit. If necessary, the driver will be asked to park adjacent to the incoming storage area to avoid traffic queues on the weighbridge.

All site operatives will be trained in the receipt and checking of waste at the acceptance stage. The nature of this work is very consistent. It will treat waste generated from utility and highway works, which have established procedures from production through to treatment.

The driver will be instructed to unsheet the vehicle and the CCTV camera will be used by the weighbridge staff to check the contents of the load. Only wastes that have the relevant pre-acceptance documentation, laboratory test results, Hazardous Waste Consignment Note and are confirmed as authorised wastes under the Environmental Permit will be accepted.

The driver will be instructed to drive to the correct unloading area. The AWCCT reception area is shown on Drawing OC-CQ-LAY-01. This is a visible and dedicated area, located on an impermeable surface with sealed drainage.

There will be separate storage bays for AWCCT feed, and the PFA.

All waste will be visually inspected as it is unloaded, or immediately after it has been unloaded.

The waste being managed at this site is unique and consistent. The on-site verification will take place for every load. For AWCCT, the nature of the waste will be established through core testing at the point of production. This information is used to provide the basic characterisation. As this waste stream is unique, it will not be necessary to carry out

compliance testing. The treated AWCCT will meet the requirements of RPS075, which does not require compliance testing. The core analysis is considered sufficient for this process.

Any incidents of non-conformance will be recorded in the Waste Rejection Form EMS-FR-02 and corrective action taken.

This complies with Waste pre-acceptance, acceptance and tracking appropriate measures (Section 3.2).

3.3 Waste Rejection Procedure

In the unlikely event that non-permitted waste is inadvertently accepted at the site, the waste will either be reloaded onto the delivery vehicle for return to the waste producer or a suitably authorised facility or deposited in a bay for quarantined storage prior to off-site removal either to the waste producer or suitably authorised facility.

There will be a quarantine bay on an impermeable surface with sealed drainage.

In addition, there will be a skip provided to store incidental materials that are encountered in the waste. As part of the on-site checks, the waste is hand sorted to remove any other material such as plastic, cardboard and paper. These are low risk waste streams and will be placed in a separate container. OCL has a contract with a waste provider to exchange the container when required.

Any instances of rejection of loads will be recorded using form EMS-FR-03, which will be made available for inspection by authorised officers of the Environment Agency. The waste producer and the Environment Agency will be notified of the non-compliance.

Waste materials dispatched off-site to an authorised facility will be removed in accordance with the Duty of Care and appropriate Hazardous Waste Consignment Notes and Waste Transfer Notes will be maintained at the site office. The records will be assigned the unique reference number for the job for tracking.

Due to the nature of the operation (that only pre-approved waste will be delivered), it is considered extremely unlikely that non-permitted waste will be accepted at the site.

3.4 Waste Storage

The annual permitted throughput of the facility will be 150,000 tonnes. There will be no more than 23,000 tonnes stored at any one time.

Storage bays will be provided at the site. Prior to accepting waste, the storage capacity of the site will be checked to ensure sufficient capacity is available.

There will be reception area for AWCCT.

The AWCCT bay will be labelled accordingly with the hazardous characteristics HP7 Carcinogenic and HP14 Ecotoxic.

The integrity of the storage bays will be checked daily as part of the daily site checks. This will also include checking the volume. Waste will only be accepted if there is capacity, all waste received is pre-notified. The Depot Manager will complete a daily log sheet (OCL/SM/F/008) with details on the storage capacity of each bay (including products). The capacity is also recorded electronically.

The wastes will be stored on an impermeable surface with sealed drainage system.

The site has been designed to minimise double handling of waste. The processing plant is mobile and can be positioned adjacent to the storage bays.

As there is only one waste stream being accepted, there will not be any incompatibility concerns.

The waste is not combustible, and fire risk is not a significant concern.

The maximum storage limits will be:

Hazardous Waste 23,000 tonnes at any one time

Note, the maximum permitted storage limit for AWCCT will be 23,000 tonnes.

Waste may be stored for more than 6 months of receipt. This extended storage time is driven by the rate of AWCCT accumulation and the logistical requirements of aligning works with appropriate treatment locations. Restricting storage to six months would undermine resource efficiency, leading to increased waste disposal and a greater consumption of virgin materials.

Storage Reference	Tonnes
HAZARDOUS WASTE	
AWCCT Reception Bay	10,000
AWCCT Processed Bay	10,000
AWCCT 0-20mm	1,000
PFA	1,000
Quarantine Bay	1,000

The reception bay has been positioned near to the site entrance. This allows deliveries to enter and unload, avoiding the treatment processes.

The AWCCT will be stored in a large bay, that has been set at least 10m from the River Soar. The nature of AWCCT is that is it in a bound, solid form. It forms a seal under its weight which reduces the likelihood of dust being generated. The impermeable surface has been designed will falls away from the River Soar. The boundary of the permitted site will be delineated with a 2.4m high concrete block wall. Surface water will not run-off towards the river.

The nature of the waste is that it is solid, and heavy. It is unlikely to overspill and be transferred to the river. The site boundary will be checked daily (behind the wall) to ensure that no waste is overspilling. Any such overspill will be cleared up. Additional monitoring will take place after Met Office Red Warnings for high winds.

The Appropriate Measures guidance states "*Wherever practicable you should store all other wastes under cover*."

The stockpile of AWCCT cannot be covered due to practical constraints including the size and the nature of the waste. The characteristic of the waste means it forms a seal under the weight and significantly reduces the risk of fugitive dust. The site will operate in accordance with the

Dust and Emissions Management Plan. Rain falling on the stockpile doesn't provide a risk to the site due to the sealed drainage system (no discharge offsite). Temporary coverings are not a suitable control measure for this specific waste stream due to the safety and practical limitations with handling.

The site does not store waste in containers.

The site does not use pallets for any storage. The site does not use fork lifts.

Pests and vermin are not associated with this waste stream.

Diesel will be used to fuel the mobile plant. A 10,000l tank will be provided for operational plant. The tank will be installed by a certified provider, meeting the Control of Pollution (Oil Storage (England) Regulations 2001.

The tanks are double skinned, sited with a bunded area, capable of holding 110% of the capacity of the container. The bunded area will be completed sealed and will contain all the components of the storage tank, including the valves.

The bunded area will be approximately 3438mm x 2000mm x 1600mm. This can hold 11,000 litres. The sizing will depend on the size of the tank used, but the bunding will be provided to hold 110%. The bund will be checked daily and rain water will be routinely removed to maintain capacity.

Spillage kits will be provided on site and kept in the site office and adjacent to the tank.

No smoking signage will be clearly displayed and maintained.

Dry powder type extinguishers will be provided.

The storage tank for the bitumen has RBA (Refined Bitumen Association) approved monitoring and metering (including high-level alarms, temperature gauge). Deliveries of bitumen are only accepted when the site is staffed. An RBA bitumen discharge permit is completed for each delivery to ensure safe practices. Due to the size of this tank (50m^3) it cannot bunded. However, bitumen is highly viscous which means that it has an extremely slow flow rate. Any leak would be detected by the alarm system which would notify the site staff to implement the spillage procedure. Any spillage would be contained within the impermeable surface and sealed drainage system. This is considered to be an appropriate measure for this specific material.

The tanks and bunds will be subject to regular inspections as part of the daily site checks, See EMS-FR-04. It will also be maintained in accordance with the manufacture's specification.

The operations do not involve the transfer of waste into and from tankers.

The operations do not involve the storage of aerosols.

The operations do not involve sorting, repackaging and bulking waste.

The operations do not involve laboratory smalls.

The section complies with the Waste storage, segregation and handling appropriate measures (Section 4). Where some measures cannot be met, these have been set out with explanation and reference to alternative measures.

3.4.1 Quarantine Area

In addition, there will be a quarantine area, clearly labelled.

The waste will be removed by licensed waste contractors and the Depot Manager will ensure all relevant paperwork including waste carrier's licences, and transfer or consignment notes are used correctly for any load of non-permitted waste.

Quarantined waste will be stored in a separate bay which will be clearly labelled and checked daily. If the wastes are problematic, i.e. biodegradable or odorous, arrangements will be made to remove the waste within 48 hours, otherwise arrangements will be made to remove the waste on a weekly basis.

A separate container will be provided for storing incidental waste such as plastic, cardboard and wood. This will be under contract with a third party, licensed operator. Arrangements will be made for a regular exchange to maintain capacity.

3.4.2 Signage

Storage areas are clearly marked, displaying information about the type of wastes permitted to be stored.

3.5 Waste Treatment

The treatment of coal tar based hazardous waste involves the encapsulation using bitumen. The treatment uses bespoke technology designed specifically for this purpose. The clear and defined benefits include:

- Reduce landfill disposal
- Full encapsulation achieves environmental benefits
- Reduced reliance on primary materials
- Reduce carbon footprint.
- Delivers circular economy with this waste stream

OCL measure this performance at each of its site. They predict that one site will deliver a net reduction in CO2 of around 450,000kg by reducing the use of virgin aggregates, replacing some warm and hot mix traditional asphalts with cold lay materials and reducing the total miles travelled for material supply. The site at Croft Quarry will help to deliver a new facility in this part of the UK to support highway maintenance projects.

The treatment process will be used specifically for the following waste EWC 170301* Bituminous mixtures containing coal tar.

The AWCCT will be crushed, and all the crushed material will be used in the cold foam mixing process. Crushing will only take place on a campaign basis, which might only be 1-2 times per month. The crusher is not permanently based at this site.

The treatment process for these wastes will be through a purpose designed cold foam mixing plant for reuse. Hot bitumen product, at circa 160 to 180^{o}C, is transferred from a sealed tank into the mixing plant, where it is reacted with pressurised air (circa 5 bar) and 1 to 2% cold water in an expansion chamber to form a bitumen foam. This expands rapidly by 15 to 20 times the bitumen volume. The ratio between maximum foam volume achieved and the volume of original bitumen is partly dependant on the amount of water added. This is computer controlled in the plant to ensure optimum performance. After reaching its maximum volume, the foam dissipates rapidly accompanied by the loss of steam. The time that the foam takes to collapse to half of its maximum volume is referred to as the half-life.

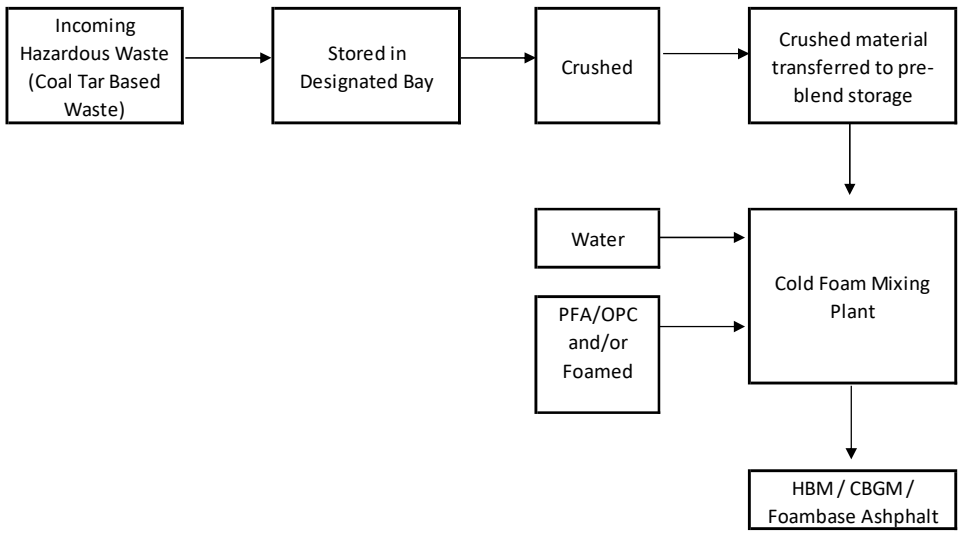
Typically, the half-life would be in the range of 20-30 seconds. This rapid collapse of the foam once it is applied to the AWCCT enables the swift processing and treatment of the material. The AWCCT is introduced into the cold foam mixing plant via a feed hopper and conveyor. Water is added to the AWCCT assists the mixing and treatment process. The foamed bitumen is sprayed onto the AWCCT and mixed within the plant to ensure that foam distribution is homogeneous, and all materials are adequately coated and encapsulated. The treated material is then discharged from the plant via a conveyor, typically to tipper vehicles for off-site removal or into a stockpile for subsequent reuse. Additives such as pulverised fuel ash (PFA) and ordinary Portland cement (OPC) are added, as required, to improve the cohesion and binding process. Depending on operational requirements, PFA and/or OPC will be stored in a mobile silo and fed via a screw auger into the plants mixing chamber. The use of OPC or PFA has the following advantages:

- Adhesion between bitumen and AWCCT is improved
- Strength of recovered materials improves, and the speed of improvements quickens
- Performance of recovered materials (i.e. resistance to deformation, rutting and moisture) improves

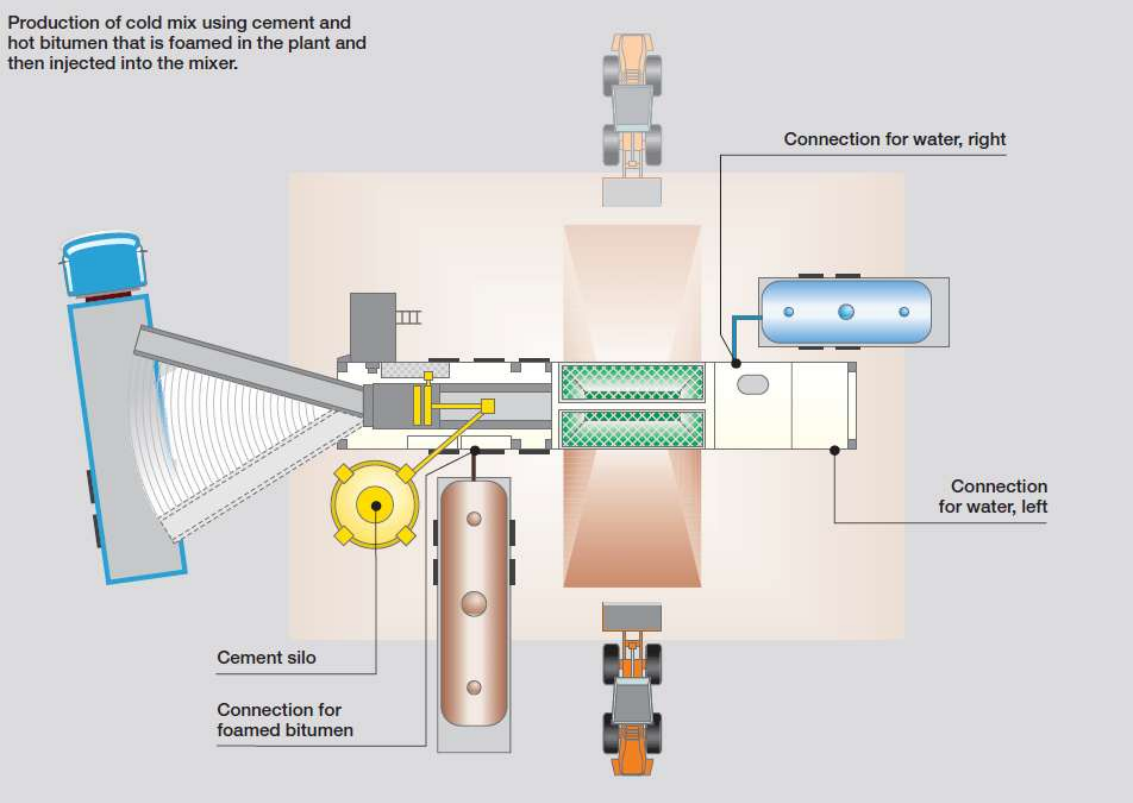
The cold foam treatment plant is computer controlled and the system includes automatic control of air and water requirements for the foaming process, display of process variables including equipment status, process alarms and all control valve positions (open/closed) with manual override function.

The display keeps the plant operator up to date on important production details, such as the quantity produced as part of a batch production. The intelligent control system registers any malfunction or material shortage and stops the plant, if required.

The process flow is as follows:



The plant to be used for this process is a mobile cold recycling mixing plant, schematic plan below.



Depending on the mix, the raw materials for this process include:

- Pulverised Fuel Ash (PFA)
- Ordinary Portland cement (OPC) – stored within separate silo.
- Bitumen
- Water
- Diesel

The amount of bitumen required will vary for each batch process.

With reference to the process flow diagram, the following emission points have been identified.

Stage	Description	Nature	Pollution Control Measure
1	Incoming Deliveries	Release of dust particles to Atmosphere	Based on Risk Assessment this is a low risk. There are no nearby receptors. The reception bay is within a bay wall
2	Crushing	Release of dust to Atmosphere	The crusher will be loaded using the minimum drop height. Dust Suppression is integral to the crushing plant.
3	Transfer to Pre-Blend Bay and loading Cold Foam Plant	Release of dust to Atmosphere	Placement will be in a bay using minimum drop height.
4	Addition of PFA or cement.	Release of dust to Atmosphere	The cement will be stored in an enclosed silo. Loading of which will be through enclosed pipework. No fugitive release of cement will take place.
5	Addition of bitumen	Release of odour to Atmosphere	The bitumen will be stored in an enclosed tank. Loading of which will be through enclosed pipework. No fugitive release of bitumen will take place. The bitumen tank has RBA (Refined Bitumen Association) approved monitoring and metering (including high-level alarms, temperature gauge). Deliveries of bitumen are only accepted when the site is staffed. An RBA bitumen discharge permit is completed for each delivery to ensure safe practices
6	Treatment	Release of dust to Atmosphere	The cold foam mixing process takes place in a fully enclosed system. The addition of materials is automatically controlled to release the substances at the set rate. Steam is contained within the plant.
7	Production and storage of HBM or CBGM or Foambase Asphalt	Release of dust to Atmosphere	The HBM will be directly loaded into a waiting vehicle. The vehicle will be sheeted before exiting the site.

The plant has an integral water tank that can hold 4,500 litres. This will be continuously mains fed. If the water is not used in treatment process, it will remain in the storage tank for the next batch.

The treatment process will fully encapsulate the AWCCT and remove the hazardous characteristics HP7 Carcinogenic and HP14 Ecotoxic.

The operator has achieved ISO14001. This certification ensures a commitment to continually check the environmental performance of plant and machinery. The company has a policy to replace plant with modern machinery, achieving a higher emission rating.

If the generator fails, the operator will hire an alternative generator to ensure that the processing capacity is maintained. Any replacement generator must meet the same emission rating or better.

The plant is bespoke technology for the waste being treated. The system is fully enclosed and automated. The only exception to this is the physical loading into the plant of the waste. Once the waste is within a plant, the addition of water and additives is controlled automatically.

The control system is used to measure the quantity of additives required for the process. The system will detect any material shortages and will shut down. The control system will record data including quantity produced as part of the batch process.

All waste will be monitored through the entire process using a computerised tracking system. This will include the following information:

- Pre-acceptance
- On-site acceptance
- Non-conformance
- Storage
- Treatment
- Removal

This complies with Section 3.3 of the Appropriate Measures.

The site does not treat aerosol canisters.

Records are maintained for all treatment residues.

This complies with Waste Treatment Appropriate Measures (Section 5).

3.5.1 Waste avoidance, recovery and transfer off site

The investment at this site is aimed at reducing the amount of waste sent to landfill. The purpose being to maximise the separation of wastes that can be recycled or recovered.

3.6 Planned Preventative Maintenance

The facility has a Planned Preventative Maintenance Programme to ensure all machinery and components continue to remain effective. Most items of plant are under a Service Agreement Plan with the manufacturer. The hours of use are used to activate maintenance. Some plant record and provide this data using telemetry direct to the manufacturer. For others, it is manually recorded and communicated with the manufacturer. For plant that is not under a

service agreement, OCL has a contract with a third party to carry out the planned maintenance.

The programme of routine planned maintenance is provided for each item of plant and machinery, as well as the processing equipment to prevent breakdown and faults which may pose a fire risk or create unnecessary noise.

All faults which require corrective action will be reported to the Depot Manager to be implemented.

The plant and equipment will be subject to service agreements with the manufacturer and/or supplier. Where appropriate, these agreements will include a 24 hour call out facility.

An adequate supply of spare parts can be provided on site. This includes items such as fuses, switches, oils and bearings. This will enable efficient repairs to be made on site to avoid process delays. These will be kept a secured stores room.

The Planned Preventative Maintenance Programme is set out on form EMS-FR-06.

3.7 Contingency

OCL Regeneration recognises that even with well planned maintenance and new equipment, contingency plans must be in place in the event of a serious breakdown.

To ensure all permitted waste quantities are adhered to and no amenity issues are caused, OCL Regeneration will ensure it has:

- Service Agreement Plans in place.
- Contacted relevant plant hire companies to source alternative equipment if required.
- A list of alternative facilities to take the waste.
- A number of customers for each product type to ensure a build-up of product on site is prevented.

Abnormal conditions may exist whereby there are problems with any process phases. In the event of a major failure of the process equipment, the facility would be able to store waste in the two reception bays up to the limits shown. This would equate to the maximum limits managed on site during normal operational conditions. Waste acceptance would not recommence until capacity has been released in the reception bays. OCL has contingency measures in place which could include hiring plant on a temporary basis or utilising plant based at another site.

The proposed process equipment uses mobile plant which allows the operator to hire replacement plant easier than if the plant was fixed.

If necessary, OCL will contact their customers and explain the situation and the contingency plan for any specific job.

OCL has a proven track record with handling this waste stream and the product. Any failure to produce the required product will result in the batch failing and being re-treated. This is an unlikely scenario.

This complies with the General Management Appropriate Measures (Section 2.5).

3.8 Drainage

The site is designed with an impermeable concrete pavement and sealed drainage system.

The waste reception area for AWCCT is concreted with its own drainage system. The concrete area is contained on three sides by concrete block wall (2.4m high), with a fall to a drain which crosses the front part of the concrete surface. The drain directs any water into sealed tank with inspection manhole. A 20,000 litre underground tank will be provided to store water.

There is a separate storage area which has three bays 1.5m high. The concrete has been constructed with falls towards the rear, which collect in a drain towards a second sealed underground tank. This tank is 4,500 litre capacity.

For both systems, each tank is fitted with a pump. The pump will activate and apply water to the dust suppression system. The tanks are fitted with alarms that activate when the tanks are nearly full. This in turn can activate the sprinkler system or be used as an early warning to the Site Manager to check the water volume and requirements.

The drainage system will be checked daily and if necessary, a contractor will be commissioned to empty the tanks. The Site Manager will monitor the forecast at the beginning of each working week and if the forecast is for heavy rain, arrangements will be made to empty the tanks.

The frequency of emptying will depend on weather conditions.

The integrity of the tanks will be checked annually.

3.9 Routine Cleaning

The site will be subject to regular cleaning.

The need for cleaning will form part of the Daily Site Checks.

3.10 Planting Decommissioning

The plant is mobile and can be easily decommissioned from this site if required. If the site is no longer required for this purpose, OCL will instigate the process of de-commissioning the infrastructure to comply with the requirements of permit surrender.

This complies with the General Management Appropriate Measures (Section 2.6).

4 EMISSIONS MANAGEMENT AND MONITORING

4.1 Introduction

An Environmental Risk Assessment has been prepared for all operations at the site, see EMS-ERA-V1.

The following sections provides the key controls to prevent harm to local amenity and the environment.

4.2 Point Source Emissions to air

There will be a point source emission to air is from the generator. A 60kva diesel generator will be used to provide electricity for heating the bitumen product for use in the foaming and encapsulation process. This plant is EU Stage IIIA certified. The risk assessment for this plant does not identify any risk with regards to air quality.

The generator meets the EU stage emission standard, and no monitoring is required. The generator is hired with a 24/7 call out facility.

There are no other point source emissions to air in the form of stacks or chimneys. There are control valves that allow the bitumen and powder silo to enter the treatment plant. These work on a fully automated process, with the computer software controlling the transfer of these materials to the plant. The system is fitted with alarms that will activate if any part of the system has an error.

4.3 Fugitive Emissions to air – dust, mud, litter and odour

The main source of fugitive emissions to air will be from the handling of the waste material. The following stages have been identified as potential sources of dust:

- Unloading waste into the storage bay
- Loading waste into the crusher
- Crushing
- Moving material on site
- Storage
- Loading the treatment plant
- Loading vehicles
- Vehicle movements

The storage of waste and materials will be within bays.

In addition, this is a low treatment frequency operation. Crushing will take place 1- 2 times per month, once there are sufficient volumes of AWCCT and it coincides with specific highway works.

The site will adopt the following control measures:

- The weather forecast will be monitored throughout the day.
- A site operative will be used to assist vehicle manoeuvring and to prevent vehicles from tracking over waste.
- All vehicles will leave the site with clean wheels. These will be checked by a site operative before leaving.

- A bowser will be available to clean the site entrance and yard.
- The stockpiles will be dampened using the suppression system.
- Speed restrictions on site limit dust arising from waste vehicles (10mph)
- As part of the site daily checks, the Depot Manager will check the entire site for evidence of any debris and arrange cleaning as required.
- Fully enclosed treatment systems.
- Enclosed cement silo (loaded and loaded using enclosed pipework).

The loading of plant and lorries will be undertaken using a loading shovels Staff will be trained to recognise conditions that may generate dust, for example reduce drop heights.

Mobile water sprays will be deployed to dampen material during dry weather conditions.

All potential emissions from activities will monitored during site opening under the supervision of the competent person, either directly or indirectly through trained staff and recorded daily using the daily site inspection form.

Litter is not associated with this activity. The daily check will include checking for litter and litter collection as necessary.

The site operates a separate entry and exit. All vehicles leaving the site will have the wheels cleaned and checked before leaving the site. Vehicle manoeuvring will be controlled using a site operative. This will help to prevent vehicles tracking through deposited waste and materials.

The site is connected to a mains water supply. A bowser will be replenished at the end of each working to be available for use the next day. The bowser can be deployed during dry weather conditions to keep the site access and entrance free from debris, to prevent this being tracked by vehicles.

A Dust Management Plan has been prepared as a separate report EMS/OP/03.

The Risk Assessment has shown that there is a low risk that odour will be generated. However, the following measures will be implemented to prevent odour nuisances:

- No Wastes producing pungent / strong odours will be accepted onto site. This forms part of the waste acceptance procedures of the Environmental Management System.
- Any waste that starts to produce pungent / strong odour will be containerise if possibly and removed from site within 48 hours and a report raised on the OSHENS reporting system (0330 105 1990). If the waste cannot be containerised, arrangements will be made to remove the waste sooner.
- If complaints are received regarding odours these will be documented on the OSHENS and thoroughly investigated. Corrective action will be taken.

4.4 Emissions of Noise and vibration

The site is located within the Croft Quarry operational site. Other activities include active quarrying, physical treatment facility for non-hazardous waste, concrete batching and contracting yards. There is a railway separating the site from the nearest residents, which are located 140m south of the site.

The risk assessment did not identify any risks associated with noise. However, the following measures will be implemented to ensure noise is minimal:

- Speed limits will be imposed for all vehicles using the site.
- Operating plant in a noise sensitive manner (avoiding unnecessary throttling back and acceleration).
- The access road will be regularly maintained, thereby minimising noise from vehicles travelling on uneven surfaces.
- All plant and machinery will be maintained in accordance with the manufacture's recommendations.
- Only trained staff will use the equipment.
- Use of site operatives to control vehicle movements to avoid unnecessary manoeuvring.
- Plant and machinery will be switched off when not in use.
- The operator will support an anti-idling campaign; and
- Maintain a site diary with accurate records of any changes in the operations.

4.5 Fugitive emissions to groundwater

There will be no fugitive or point source emissions to groundwater from the waste operational areas.

This section details the procedures for preventing fugitive emissions to groundwater.

- The waste will be stored and treated on impermeable surface with sealed drainage.
- The surfacing will be checked daily.
- All fuels stored on site will be in a bunded container able to hold 110% of the container volume.

  All staff are trained on the Emergency Response Plan (EMS-OP-02) and understand the actions to be taken in event of a spill.

4.6 Point Source Emissions to Surface Water

There are no point source emissions to surface water.

4.7 Point Source Emissions to Foul Sewer

There are no point source emissions to foul sewer.

4.8 Monitoring

Monitoring is proposed for this site in the form of the visual daily checks. This will be kept under review and updated in the event of substantiated complaints being received.

Monitoring will be undertaken at the site boundary. This will be carried out daily, increasing to twice daily during windy weather conditions. The monitoring time will be adapted to ensure that it coincides with site based activities such as processing. In addition, the site is manned during operations and all staff will be trained to check for dust throughout the working day.

Monitoring will be carried out by the Depot Manager. If any dust is observed leaving th5e site, the Depot Manager will be able to record the source of the dust and implement correct action. Such action may be as follows:

- Ensure the dust suppression system is operational.
- Deploy water sprays.
- Reduce drop heights.
- Cease operations until better weather conditions return.

A record of the weather conditions will be made daily, noting any changes during the day that may affect the dust management response (for example, increased wind strength, rain).

In the event that substantiated complaints are received regarding dust, this EMS will be reviewed and updated accordingly.

All staff will be trained to check for dust throughout the working day.

4.9 Complaint Procedure

4.9.1 Roles and Responsibilities

The TCM or Depot Manager has the overall responsibility for this procedure.

The administration staff will all be responsible for handling complaints and recording on the correct form. All complaints must be referred to the TCM.

4.9.2 Definition

In this context, a complaint may be received directly from a resident, customer or from a Regulator.

4.9.3 Procedure

When the site receives a complaint, a record is summarised in the Site Diary. Full details will be provided on the incident form (EMS-FR-05).

All staff based in the office will be trained to record complaints and to make sure they notify the TCM or Depot Manager immediately.

The site management will review the activities that may have given rise to the complaint for example noise, dust or odour.

The TCM or Depot Manager will report the findings to the complainant and implement appropriate corrective action in accordance with a specific management plan or the Operational Procedures.

The Depot Manager will report to the Site Management Team monthly. This will include reporting any specific complaints or compliance issues.

4.9.4 Engagement with the Community

Emergency contact information is displayed at the main office. Members of the public will be able to contact the control centre on the designated number.

This complies with the Appropriate Measures for Emissions control. (section 6).

5 ADDITIONAL MEASURES

5.1 Raw material inputs

The raw materials used in the treatment process are:

- Diesel for the plant.

Other materials such as greases and lubricating oils will be stored in small quantities on site as part of the on-going maintenance of the process plant.

A Safety Data Sheet will be kept on site for each material

Spillage kits will be provided on site and kept in the site office and adjacent to each tank.

No smoking signage will be clearly displayed and maintained.

Dry powder type extinguishers will be provided.

Other raw materials include:

Pulverised Fuel Ash (PFA)	Open storage bay
Ordinary Portland cement (OPC)	Enclosed Silo
Bitumen	Tank
Diesel	Bunded Fuel Tank
Water	Mains supply

The PFA will be delivered and placed in the dedicated storage bay. The PFA meets the technical specification BS EN 13055-1:2002. PFA ceases to be a waste when it meets the requirements of an approved product standard. The standard described above is an approved product standard. OCL maintain compliance test certificates from the producers. As part of OCL's EMS, this information is checked and updated annually.

The PFA will be stored within a bay that has concrete walls on three sides to contain it. PFA generally forms a crust which sets unless disturbed. If the PFA is to be stored for long periods, it will be covered in a plastic sheet or tarpaulin.

5.2 Waste Minimisation Audit

The operation is primarily waste storage and treatment. The treatment process is specifically designed to reduce the volume of waste to improve efficient recovery options and reduce transport costs.

The operator will continually review the process and implement further waste minimisation measures.

5.3 Waste Recovery or Disposal

The facility is a waste facility designed to increase recovery and minimise disposal.

The operator will continue to consider making efficiencies in its processes to ensure the diversion of waste from disposal and movement up the waste hierarchy. This will be linked to the Environmental Management System.

5.4 Water Use

Water is used for dust suppression and for processing. An audit on water usage will be made following 12 months of commencement.

5.5 Energy

The energy use of the site will be measured during the first year of operation.

5.5.1 Energy Efficiency Plan

Energy use at the site will be low. As the site is not operational, a review of the energy consumption will be carried out 12 months after operations commence. OCL will monitor the annual consumption of water, energy, raw materials, and any waste residues, on an annual basis.

Energy efficiency measures will be incorporated where possible into the day to day activities of the installation. However, the energy requirements are essential to the continued operation of the installation to prevent pollution and minimise environmental risks.

There are potential energy efficiency improvements to be made including basic energy awareness measures such as energy saving light bulbs, insulation and switching off lights when rooms are not in use. The operator will provide an anti-idling campaign to ensure all plant and machinery is switched off when not in use.

To fulfil the requirements of the EMS, a procedure is in place that ensures the continual improvement of techniques used on site, as well as the long-term monitoring of innovative techniques that appear on the market during the life of the site. These may include further energy efficient measures, potential ‘cleaner’ fuel options and energy efficient systems for environmental protection.

This complies with Section 8 Process Efficiency Appropriate Measures.