

# **ENVIRONMENT MANAGEMENT SYSTEM**

C O'Donovan & Sons Ltd

Ingram Road

Holbeck

Leeds

LS11 9RD

Version 1.0 July 2020



**SJW Enviro Consulting Ltd**

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#### **Appendix 1 – Drawings**

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Drawing No. – COD/EMS/02	Permit boundary plan
Drawing No. – COD/EMS/03	Site layout plan
Drawing No. – COD/EMS/04	Site drainage current and proposed

#### **Appendix 2 – Technical Competence Certificates**

## 1.0 GENERAL CONSIDERATIONS

### 1.1 Site operator / permit holder

1.1.1 The site which is the subject of this environmental management system (EMS) is operated by C O'Donovan & Sons Ltd.

1.1.2 This EMS relates solely to the area of the site which is used as a waste treatment and transfer facility. Any reference to 'the site' in this document relates to the treatment and transfer facility only.

1.1.3 The site is approximately 5300 square metres in size, parts of which have been in use as a drum reconditioning facility since the early 1990's.

1.1.4 This EMS will form part of the Environmental Permit for this site. It is also to be used to give instructions to staff specifying how the site shall be managed and operated.

1.1.5 The site is situated at the following address:

Ingram Road	Contact: Clifford O'Donovan
Holbeck	Tel: 0113 245 3845
Leeds	
West Yorkshire	
LS11 9RD	

1.1.6 SJW Enviro Consulting Ltd has been employed as consultants for C O'Donovan & Sons Ltd to produce the EMS for this facility. Contact details are as follows:

Address:	SJW Enviro Consulting Ltd	Tel: 07471 910102
	8 Meadow Bank	
	Holmfirth	
	West Yorkshire	
	HD9 1QS	

Contact: Simon Walker      E-mail: [simon@sjwenviroconsulting.co.uk](mailto:simon@sjwenviroconsulting.co.uk)

### 1.2 Company environmental policy

1.2.1 C O'Donovan & Sons Ltd is committed to achieving high performance across the whole range of its activities. Compliance with all relevant environmental legislation is a core requirement of this policy.

1.2.2 The company will pursue continual improvement in performance and management, with the objective of protecting and enhancing the environment and preventing pollution.

- 1.2.3 Company policies and procedures will be subject to frequent review and all staff at all levels will receive compliance training, updated at regular intervals.
- 1.2.4 The company will actively promote waste recycling and recovery, seeking to extend the range of material recycled with the objective of replacing the use of non-sustainable natural resources where possible.
- 1.2.5 Environmental performance will be given equal priority with all other business objectives and all staff will be made aware of the adherence to this Environmental Policy is the responsibility of all employees.

### **1.3 Permit area**

- 1.3.1 The site is located off Ingram Road, Holbeck approximately 1600 metres to the south west of Leeds City Centre. The site entrance is directly off Ingram Road opposite its junction with Shafton Lane as shown on plan No. COD/EMS/01, served at OS map reference SE 28777 32219. The immediate surrounding areas are comprised of industrial units, housing and allotments.
- 1.3.2 The area which is subject to this application is outlined in green on drawing no. COD/EMS/02. All references to 'the site' in this document shall mean this area.

### **1.4 Hydrology and Hydrogeology**

- 1.4.1 Flood maps indicate that the site is entirely within Flood Zone 1. The area does not benefit from flood defences or a flood water storage area.
- 1.4.2 The Environment Agency groundwater vulnerability map classifies the area under the site has a medium vulnerability.
- 1.4.4 There are no wells, springs or boreholes within 50 metres of the site boundary used for the supply of water for human consumption. The nearest borehole is 25 metres to the east of the site on Shafton Lane. This borehole is 5 metres deep, was drilled in 1975 and is dry.
- 1.4.5 The site is not located within a surface water Nitrate Vulnerable Zone. No nitrate is produced or used on the site.

### **1.5 Waste management operations**

- 1.5.1 Permit number EAWML 65145 was issued to John Milner & Son Ltd on 7<sup>th</sup> February 1994 and subsequently transferred to Mr Clifford O'Donovan on 28<sup>th</sup> November 2007. Modern permit No. EPR-DP3094ZS was issued 11 April 2017. This EMS accompanies an application to increase the permitted area of the site, increase the quantity of waste material accepted and to add additional waste codes.
- 1.5.2 Waste processes carried out on this site include the following:

Specified waste management operations include waste recovery operations listed in Parts II and III of Schedule 4 of the Environmental Permitting Regulations (England and Wales) 2010. They are listed in summary below:

- R4 Recycling/reclamation of metals and metal compounds
- R5 Recycling/reclamation of other inorganic materials
- R13 Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)
- D15 Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)

## **1.6 Hours of operation**

- 1.6.1 Site operations will only take place during the hours agreed with the Local Planning Authority.

Waste Delivery and Process Activities:

Monday to Friday	0600 – 1800 hrs
Saturday	0600 – 1200 hrs

No operations will take place on Sundays or Bank Holidays or outside the above hours without written agreement from the Local Planning Authority and the Environment Agency.

- 1.6.2 Floodlights are available for use if permitted operations or emergency procedures are carried out after official lighting up times. Mobile floodlights will be made available if additional lighting is required.

## **1.7 Waste types and quantities**

- 1.7.1 The site accepts nominally empty IBC's and drums of various sizes for washing. In addition, various other waste items are collected to provide a 'one-stop' waste management service to clients.
- 1.7.2 The site will accept the following waste types, consisting of the relevant codes and descriptions from the EWC Waste Classification. The Environment Protection (Duty of Care) Regulations 1991, as amended, require the use of these codes on all waste transfer notes.

### **13 OIL WASTES AND WASTES OF LIQUID FUELS (EXCEPT EDIBLE OLS, AND THOSE IN CHAPTERS 05, 12 AND 19)**

#### **13 01 waste hydraulic oils**

13 01 09 mineral-based chlorinated hydraulic oils

- 13 01 10 mineral based non-chlorinated hydraulic oils
- 13 01 11 synthetic hydraulic oils
- 13 01 12 readily biodegradable hydraulic oils
- 13 01 13 other hydraulic oils

**13 02 waste engine, gear and lubricating oils**

- 13 02 04 mineral-based chlorinated engine, gear and lubricating oils
- 13 02 05 mineral-based non-chlorinated engine, gear and lubricating oils
- 13 02 06 synthetic engine, gear and lubricating oils
- 13 02 07 readily biodegradable engine, gear and lubricating oils
- 13 02 08 other engine, gear and lubricating oils

**13 07 wastes of liquid fuels**

- 13 07 01 fuel oil and diesel
- 13 07 02 petrol
- 13 07 03 other fuels (including mixtures)

**15 WASTE PACKAGING, ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED**

**15 01 packaging (including separately collected municipal packaging)**

- 15 01 02 plastic packaging
- 15 01 04 metallic packaging
- 15 01 06 mixed packaging
- 15 01 10 packaging containing residues of or contaminated by hazardous substances

**15 02 absorbents, filter materials, wiping cloths and protective clothing**

- 15 02 02 absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by hazardous substances
- 15 02 03 absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02

**16 WASTES NOT OTHERWISE SPECIFIED ON THE LIST**

**16 01 end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)**

- 16 01 07 oil filters

**16 02 wastes from electrical and electronic equipment**

- 16 02 11 discarded equipment containing chlorofluorocarbons, HCFC, HFC
- 16 02 13 discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12
- 16 02 14 discarded equipment other than those mentioned in 16 02 09 to 16 02 13
- 16 02 15 hazardous components removed from discarded equipment
- 16 02 16 components removed from discarded equipment other than those mentioned in 16 02 15

**16 05 gases in pressure containers and discarded chemicals**

16 05 04 gases in pressure containers (including halons) containing hazardous substances

16 05 05 gases in pressure containers other than those mentioned in 16 05 04

**18 WASTE FROM HUMAN AND ANIMAL HEALTH CARE AND/OR RELATED RESEARCH (EXCEPT KITCHEN AND RESTAURANT WASTES NOT ARISING FROM IMMEDIATE HEALTHCARE)**

**18 01 wastes from natal care, diagnosis, treatment or prevention of disease in humans**

18 01 04 wastes whose collection and disposal is not subject to special requirements in order to prevent infection (for example dressings, plaster casts, linen, disposable clothing, diapers)

**20 MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPERATELY COLLECTED FRACTIONS**

**20 01 separately collected fractions (except 15 01)**

20 01 21 fluorescent tubes and other mercury containing waste

20 01 23 discarded equipment containing chlorofluorocarbons

20 01 35 discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components

20 01 36 discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35

- 1.7.3 The total maximum amount of waste accepted at the site shall not exceed 10,000 tonnes per annum. The throughput of the site will be limited to a maximum of 200 tonnes per day of which no more than 10 tonnes shall be hazardous.
- 1.7.4 The maximum amount of waste stored on site at any one time shall not exceed 400 tonnes.
- 1.7.5 The maximum amount of hazardous waste stored on site at any one time shall not exceed 50 tonnes.
- 1.7.6 If the maximum storage capacity of the site is reached then no further waste will be accepted until waste can be processed or removed from site and taken to a suitably authorised facility.

**1.8 Staffing and management**

- 1.8.1 The site will be open for the acceptance of waste or for other essential operations during the hours listed in Section 1.4 above. There will be an adequate number of staff and drivers employed on the site during operating hours to ensure compliance with the relevant legislation.



## **1.9 Health and safety**

1.9.1 All operations on site will be carried out in accordance with the relevant requirements of the Health and Safety at Work Act 1974.

## **1.10 Fit and proper persons**

1.10.1 The designated technically competent manager for the site is Dougie Morrison. WAMITAB certificates of technical competence along with proof of continuing competence are attached to this document in Appendix 2.

1.10.2 There will be a training programme for all staff involved in site operations to ensure sufficient suitably trained persons are available on site to ensure compliance with the permit. Personnel training records will be maintained and available for inspection in the site office.

## **1.11 Exempt activities**

1.11.1 There are currently no exemptions registered for this site.

1.11.2 Wastes brought onto site as part of an exempt waste activity in the future will be kept clearly segregated and identified from those wastes imported for the specified waste management operations.

1.11.3 Once registered a copy of all exemption notifications and register entries will be kept in the site office.

## **2.0 SITE ENGINEERING AND INFRASTRUCTURE**

### **2.1 Access and parking**

2.1.1 The main access to the site is off Ingram Road. Site location is shown on Drawing No. COD/EMS/01.

2.1.2 There is no provision for parking for staff and visitors on site. Parking is available on Ingram Road adjacent to the site.

### **2.2 Notice board and signs**

2.2.1 A noticeboard will be located adjacent to the site entrance and will display the following information:

- The site name and address
- The name of the permit holder and operator
- The Environmental permit number
- The Environment Agency contact details
- Operators 'out of hours' emergency number

2.2.2 Additional signs will be displayed around the site for operational and health and safety purposes. All staff and visitors will be required to comply with the requirements of all signs whilst on site.

## **2.3 Site security**

- 2.3.1 The permitted area is surrounded by fencing or walling to a minimum height of two metres.
- 2.3.2 The entrance gate is made up of 3 metre high metal paling fencing topped with spikes. The gate is padlocked closed at all times when the site is not operational.
- 2.3.3 There are CCTV cameras covering the site and more will be added as the additional site area is brought into the permit. CCTV cameras can be monitored from the site office during the date and out of hours by the company directors and technically competent manager via their mobile phones.

## **2.4 Site office**

- 2.4.1 The site office is located as shown on Drawing No. COD/EMS/03. A copy of the waste permit and management documents will be held on site in the site office. Welfare facilities are provided for site staff.
- 2.4.2 The following documentation will be retained on site:
- Environmental waste permit
  - Management system documents
  - Site diary
  - Environment Agency inspection forms
  - In-house inspection and recording forms
  - Hazardous waste consignment notes
  - Waste delivery tickets
  - Weighbridge tickets
  - Accident management plan
  - Accident book

## **2.5 Measurement of waste inputs**

- 2.5.1 There is no weighbridge associated with the site and waste arriving at site is not weighed..

## **2.6 Wheel cleaning facilities**

- 2.6.1 The site does not have a wheel wash or spinner, however, the whole of the permitted area is surfaced with concrete and operations at the site do not lead to residues on the site surface. As a consequence, it is not felt that mud on the public highway would be an issue other than in exceptional circumstances.
- 2.6.2 In dry conditions when dust could become windborne as a result of vehicle movements a road sweeper or hoses would be used to damp the haul and access roads within the site. Details of these deployments will be retained in the site office and will be available for inspection by the Environment Agency on request.

## **2.7 Fuel Storage**

2.7.1 Diesel and gas oil and stored in both washing sheds inside IBC's. In turn the IBC's are located within bunds capable of holding 110% of the capacity of the largest container.

## **2.8 Waste Quarantine area**

2.8.1 An area for the storage of rejected waste is provided on site for the deposit of material that cannot be removed from the site immediately. The location of this quarantine area is shown on Drawing No. COD/EMS/03

## **2.9 Drainage**

2.9.1 The yard area falls to a drainage system which collects waste water which drains into a sump where it is pumped into an effluent tank. The tank holds up to 10,000 litres of effluent and from there it is fed into an effluent treatment plant. The location of the sump and the treatment plant are shown on Drawing No. COD/EMS/04

2.9.2 The company has a discharge consent to discharge water from the treatment plant into the sewer.

2.9.3 Two further sumps on site are located close to the site office and in the newly acquired yard extension area. These sumps are pumped out manually into IBC's as required. The contents of the IBC's are then transferred to the sump adjacent to the treatment plant where the contents undergo treatment before being discharged to the public sewer.

2.9.4 The whole permitted area is designed to drain towards the sumps on site with the exception of the small separate yard of Fredrick Street. No waste is stored in this area however.

2.9.5 Details of the current drainage plan and those proposed to be erected in the new area of the site are shown on Drawing No. COD/EMS/04

## **2.10 Surfacing**

2.10.1 The site is surfaced entirely with an impermeable pavement composed of reinforced concrete.

## **2.11 Vehicles, plant and equipment**

2.11.1 Plant and equipment associated with the treatment and transfer of waste will be in use at the site at any time. Additional equipment may be installed as required. Currently the site has:

- 3 Forklift trucks
- 9 Steam cleaners
- 3 Dryers
- 2 Pressure testers
- Effluent treatment plant

## **3.0 SITE OPERATIONS**

### **3.1 Preliminary procedures**

- 3.1.1 Guidance will be given by the site management (operator and permit holder) to all employees, sub-contractors, other waste carriers and customers regarding the waste types which are acceptable at the site. Carrier registration details will be taken for any new haulage operators bringing waste to the site and the details will be periodically checked via the Environment Agency's website to ensure that they are still registered.
- 3.1.2 Over half of the waste processed at the facility will generally be collected by the permit holders. However, various other collectors or producers may deliver waste to the site.
- 3.1.3 Where material is to be collected by a C O'Donovan & Sons vehicle an initial inspection will be made by the driver prior to loading the material onto the wagon. Should waste items that are not permitted at site be noticed then the driver will request that these be removed prior to the load being taken away.
- 3.1.4 Waste will only be accepted at the site if the consignment has been pre-notified to the operators.

### **3.2 Checking in and inspecting loads**

- 3.2.1 On arrival at the site the driver will report to the site office. The load will be visually inspected to ensure that the composition of the waste complies with the documentation and that it is in a satisfactory condition.
- 3.2.2 Operators arriving at site without a valid waste carriers registration will not be allowed to deposit waste.
- 3.2.3 If unsuitable waste is discovered before deposit the load will not be unloaded and will be rejected by the operator and returned to the producer. In cases where the unauthorised waste is likely to lead to a breach of permit conditions or where the rejected waste is thought to be hazardous the Environment Agency will be contacted.

### **3.3 Waste deposit, manual handling and storage**

- 3.3.1 If accepted at the site, waste will be unloaded into the designated storage areas.
- 3.3.2 Loads consisting of mixed waste will first have drums and IBC's removed to the designated storage areas. Other waste will then be moved to the waste storage area in the newer part of the site as shown on Drawing No. COD/EMS/003 attached to this document.
- 3.3.3 Drums and IBC's are first washed and dried. Those containers that are suitable for re-use are then stored in the yard area prior to removal from site.
- 3.3.4 Drums and IBC's that can not be re-used are scrapped.

- 3.3.5 The site will accept small quantities of waste electric and electronic equipment (WEEE) as part of ancillary loads accepted from clients. Individual items of WEEE arriving on site will be stored in the waste transfer building before being moved off site to a suitably permitted facility for further treatment, recycling or disposal.
- 3.3.6 Others wastes, as detailed in 1.7.2 above, arriving at the site as part of a mixed load will be unloaded and stored in the waste transfer building.
- 3.3.7 Different waste types are segregated within the waste transfer building.
- 3.3.8 Waste material is stored in suitable containers, predominantly IBC's with their top removed.
- 3.3.9 Loads are inspected when they are deposited either in the waste acceptance building or within the waste piles to ensure that it complies with the terms of the site permit.
- 3.3.10 All staff who work on the site shall be made aware of the acceptable categories of waste allowed to be deposited. Site staff shall be responsible for inspecting each load. To ensure compliance with this, periodic spot checks shall be made by the site manager.
- 3.3.11 Should non-permitted waste be deposited within a load delivered to site by a vehicle outside the ownership of C O'Donovan & Sons Ltd then, where possible, the material will be re-loaded into the vehicle and the driver shall be asked to leave the site.
- 3.3.12 Persistent non-compliance with the terms of the site permit by a contractor may result in the contractor being banned from the site for a specified length of time to be determined by site management.
- 3.3.13 Rejected wastes not immediately returned to the customers will be deposited in the quarantine area and will be recorded in the site diary.
- 3.3.14 In the unlikely event of any non-permitted hazardous waste being found in the loads, arrangements for its removal from site shall be made as a matter of urgency by means of a specialist contractor operating to the requirements of the relevant legislation. In such cases the Environment Agency will be informed of the nature and quantity of the waste involved and the date and time it was noticed.
- 3.3.15 Whilst on site such non-compliant hazardous waste shall be handled in accordance with site procedures and the material shall be placed within the quarantine area if possible.
- 3.3.16 No material will remain within the quarantine area for longer than seven days.

#### **3.4 End of life vehicles**

- 3.4.1 The site is not permitted to accept end of life vehicles for depollution.

### **3.5 Waste removal and export**

- 3.5.1 Transport of material away from the site is undertaken by the permit holder and other external carriers.
- 3.5.2 Bulk up waste streams removed from the waste transfer station will be transported to other suitably permitted facilities for further treatment, recycling or disposal.
- 3.5.3 Scrap metal recovered from non-viable IBC cages or scrap metal drums is taken to permitted metal recycling sites.
- 3.5.4 Scrap plastic is removed from the site for recycling at a suitably permitted facility.

### **3.6 Record keeping**

- 3.6.1 The details below will be recorded on a combination of the record keeping forms, invoices, the site diary and controlled waste transfer notes or hazardous waste consignment notes when required. The records will be kept in paper or electronic format and be available in the site office for inspection upon request.
- 3.6.2 The following details will be recorded for every load deposited at the site:
  - The date and time of delivery.
  - The name and address of the waste producer.
  - The type and quantity of waste including EWC code.
  - The carriers name and address.
  - Drivers name and vehicle registration number.
- 3.6.3 The following details will be recorded for all deposits of non-conforming waste at the site and will be forwarded to the Environment Agency where required:
  - Date and time of deposit.
  - A description of the waste including EWC code.
  - The quantity of waste.
  - Name, address and telephone number of the waste producer.
  - The carriers name and vehicle registration number.
  - The reason for the rejection of the waste and the action taken.
- 3.6.4 The following details will be recorded for every load of waste leaving the site:
  - The date and time of removal.
  - The type and quantity of waste including EWC codes.
  - The destination waste management site or exempt facility.
  - The name and registration number of the carrier or employee removing the waste.

- 3.6.5 A summary of the waste types and quantities deposited and removed from the site will be provided to the Environment Agency at intervals specified by the environmental permit for the site in a form approved by the Agency.
- 3.6.6 The outcome of all inspections of waste types, yard areas, storage tanks, bunds, drainage channels etc. will be recorded and detailed comments will be entered into the site diary including action taken or proposed.
- 3.6.7 Visitors to the site will sign the visitors book upon arrival and exit stating the purpose of their visit and whom they represent.

## **4.0 ENVIRONMENTAL CONTROL, MONITORING AND REPORTING**

### **4.1 Breakdowns and spillages**

- 4.1.1 In the event of a breakdown of plant or equipment an alternative will be brought onto site until it is repaired. If an alternative machine cannot be used then no further waste will be accepted until suitable plant is obtained. Minor repairs on plant and machinery will be carried out on site with absorbents used to clear oil or fuel spillages. All other operations on site will continue as normal.
- 4.1.2 All internal and external site surfaces will be inspected daily when the site is in operation. Debris will be swept as required and placed in a container for disposal.
- 4.1.3 Any spillages of fuel will be cleared immediately by depositing sand or absorbents on the affected area. The sand or adsorbents will be placed in a container to be taken to a suitably authorised site for disposal. All spillages of waste on the yard area and any windblown litter will be cleared by the end of the working day on which they occur. Spillage clearance procedures are detailed in Section 5.
- 4.1.4 All wastes liable to give rise to contamination will be removed from the site if the site is not secure or if operations cease or are temporarily, suspended.

### **4.2 Site inspections and maintenance**

- 4.2.1 The inspections for maintenance or housekeeping will be completed by a person who is familiar with the requirements of this management system and environmental permit for the site. All details of defects, problems and repairs carried out will be recorded in the site diary on the day that each event occurs. Detailed comments may also be recorded. All repairs will be carried out within five working days unless otherwise agreed with the Environment Agency.
- 4.2.2 All repairs to site security will be made within five working days of the discovery of the damage and the site will be made secure until the repair has been effected.

- 4.2.3 Any major defects found during the daily site inspection which are likely to lead to a breach of permit conditions will be repaired by the end of the working day in which they were found where possible. If a repair is not possible by the end of the working day the Environment Agency will be contacted to agree a suitable timescale for the repair.
- 4.2.4 All defects and problems likely to give rise to pollution will be recorded in the site diary with repairs or solutions being carried out as soon as is practicable.
- 4.2.5 A programme of planned maintenance will be followed and ensuring manufacturers recommendations for inspection and maintenance are carried out. Essential spares for plant maintenance will be kept on site.
- 4.2.6 Waste processing areas, storage areas, concrete hardstanding, buildings, kerbs and bunding will undergo weekly visual checks for wear and tear or physical damage.
- 4.2.7 All drainage systems will be inspected at twice weekly intervals to ensure that they are functioning effectively. Any silt traps will be inspected and emptied when necessary. Oil/water mixtures collected in the sumps will be removed as required.

#### **4.3 Monitoring and control of debris and site residues**

- 4.3.1 Vehicles will be visually inspected before exit to check that loads are secure and that no debris is carried out on the wheels or body of the vehicle to ensure that they comply with the requirements of the Duty of Care. Visual inspections of the site are carried out daily and staff will report any problems with debris on the site surfaces immediately to the site manager.
- 4.3.2 The deposit of materials on the public highway will be treated as an emergency and will be cleared immediately by the operator either by hand or by using a road sweeper.

#### **4.4 Monitoring and control of dust**

- 4.4.1 The site does not accept dusty wastes but it does, however, have a large external area that could potentially dry out and become dusty.
- 4.4.2 Historical observations have noted no substantiated dust complaints against the site.
- 4.4.3 Should a dust problem develop, or a complaint be received from members of the public or the Environment Agency then immediate action will be taken to identify the source. This includes investigating other potential sources outside the permitted area of the site.
- 4.4.4 If a dust issue is identified within the site then action will be taken to deal with the problem immediately. Dusty areas will be dampened down to prevent dust from becoming airborne and concrete areas will be swept clean.



#### **4.5 Monitoring and control of odour**

- 4.5.1 The site does not accept domestic refuse which can be odour forming, nor is waste kept on site for a significant length of time.
- 4.5.2 Historical observations have noted no substantiated odour complaints against the existing site and it is not anticipated that the new larger site will generate odour complaints.
- 4.5.3 Site operatives and site management remain vigilant for odours resulting from waste management operations.
- 4.5.4 Should an odour problem develop, or a complaint be received from members of the public or the Environment Agency then immediate action will be taken to identify the source. This includes investigating other potential sources outside the permitted area of the site.
- 4.5.5 If an odour issue is identified within the site then action will be taken to deal with the problem immediately. Suspected waste will be removed from the site and an investigation into waste acceptance procedures and waste storage times undertaken.

#### **4.6 Monitoring and control of litter**

- 4.6.1 All waste which have the potential to become windblown will be deposited within the waste reception building in the newer part of the site.
- 4.6.2 On site training for site operatives includes good housekeeping practices and any loose waste that does escape the confines of the building are cleared up at the end of the working day and returned to the building.
- 4.6.3 A daily check of the site and the site boundaries is carried out as part of the site managers daily inspection and is recorded in the site diary. Checks off site in the vicinity are carried out following periods of adverse weather conditions where there is a possibility of litter escape from site or in the event of a complaint. If it is determined that action is required site staff will be despatched to clean the affected area.

#### **4.7 Monitoring and control of pests, birds and other scavengers**

- 4.7.1 The site will be inspected daily for the presence of vermin and the results of the inspection noted in the site diary or site inspection form. If the presence of vermin is detected a pest control contractor will be contacted immediately to provide appropriate remedies.

#### **4.8 Monitoring and control of noise**

- 4.8.1 Noise levels shall be controlled by using efficient silencers on all on-site plant and machinery. A regular and effective plant maintenance programme shall ensure that all noise reduction measures continue to operate effectively.

- 4.8.2 Any incidence of noise nuisance or complaints shall be investigated, and where applicable, corrective mitigating action taken. All action will be recorded in the site diary and the Environment Agency informed if necessary.

#### **4.9 Environmental monitoring and reporting**

- 4.9.1 No surface water or groundwater monitoring is required at this time.
- 4.9.2 Weather conditions will be logged in the site diary if they are likely to lead to a breach of permit conditions.
- 4.9.3 All complaints received, and action taken, in respect of any complaints will be recorded in the site diary.
- 4.9.4 The site diary and all associated monitoring forms will be available for inspection in the site office at all times.

#### **4.10 Monitoring of sewer discharges**

- 4.10.1 Residue from the waste treatment facility on site are discharged to foul sewer under the terms of a discharge consent issued by Yorkshire Water.

### **5.0 EMERGENCY PROCEDURES**

#### **5.1 General**

- 5.1.1 In addition to obligations imposed by RIDDOR '95 (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995) the operator will notify the Environment Agency of any serious injuries to employees, other site users or members of the public arising as a result of operations on site. Minor injuries such as cuts and bruises will be recorded in the accident book on site. Separate procedures will be used for different types of emergencies. An emergency at the site is defined by site management as follows:

‘Any incident likely to result in harm to human health or pollution of the environment or serious breach of permit conditions and serious detriment to the amenities of the locality.’

- 5.1.2 For all emergency situations the deposit of any further waste will be suspended where necessary to allow action to be taken safely. If necessary staff and other users of the site will be evacuated to an area which is a safe distance away from the hazards. Staff handling the emergency will be provided with and trained to use the necessary PPE unless the manager instructs that the hazard is too severe and outside help is needed from the emergency services or specialist waste contractors.

#### **5.2 Fire prevention and control**

- 5.2.1 No waste will be burned on site. Any fire on site will be treated as an emergency.

- 5.2.2 In the event of a fire on site fire extinguishers are located in the drum processing buildings, waste storage building, site offices and around the external waste storage areas.
- 5.2.3 Site staff will be trained in the use of fire extinguishers as part of the ongoing training and development programme.
- 5.2.4 Sources of ignition have been assessed and reduced as far as reasonably practicable. Remaining ignition sources have been identified and controlled as follows:

No smoking is allowed on site.

Hot works in the form of cutting of metal are not carried out on site

All portable electrical appliances are PAT tested annually and certified by a fully qualified electrician. Electric lights are insulated.

- 5.2.5 On a daily basis each storage pile is visually inspected by the site manager for any anomalies, such as visual signs of heat, steam and vapour. Anomalies are actioned immediately by investigation and remedial action will be taken such as rotation of the material or damping down as deemed necessary.
- 5.2.6 Due to the nature of the business, site operators are located within the operational areas for the majority of the working day, they continually and vigilantly monitor the condition of all the processes for potential fire risk situations.
- 5.2.7 In the event of a fire the most senior member of staff on site would act as incident controller to deal with the situation.

To prevent an incident escalating and to reduce the spread of fire, there is a possibility to move unburnt material with the machines to an alternative area of the site. The initiation of this action would be taken by the incident controller and would always consider the safety of the employees. The assessment as to the feasibility of moving unburnt material would consider

- The safety of the operator inside the machine;
- The direction of the smoke;
- The heat of the fire;
- The means of escape for the operator;
- The likelihood of the machine catching fire due to radiated heat.

In the case of a small fire there is the option of using one of many fire extinguishers placed around the site to attempt to bring it under control. Again, the factors relating to the health and safety of the operatives must be taken into account and at no point should a site operative compromise his health and safety.

- 5.2.8 In the event of a fire, site staff will be made available to contact local residents and businesses to make them aware of the situation. Deployment of staff will be at the site management and emergency services discretion. Should evacuation of the surrounding area be necessary then site staff would be in place to assist this process as well as to provide site specific information to the emergency services.

- 5.2.9 The Environment Agency will be informed of any fire on site within 4 hours of the incident.

### **5.3 Spillages**

- 5.3.1 If any spills occur from plant, vehicles or stored fuel and oil a spill containment kit (absorbent pads, booms or granules) will be used to prevent further spillage and the contaminated absorbents placed in a container for disposal at a suitably permitted site.

### **5.4 Adverse reactions**

- 5.4.1 No wastes are accepted which will react to present such a hazard. All containers arriving at the site are nominally empty.

### **5.5 Poor visibility**

- 5.5.1 The site will not operate in conditions of poor visibility such as dense fog to reduce the risk of vehicle collision or other accident.

### **5.6 Operational Failure**

- 5.6.1 The manager will be contacted in the event of any operational failure such as the breakdown of plant, systems or equipment and will decide whether operations are to continue or be suspended prior to corrective action being taken. Operational failures which result in the closure of the site will be recorded in the site diary.

### **5.7 Overtaken vehicle**

- 5.7.1 If a vehicle is overturned on the site or near the site entrance then no further waste will be accepted until the vehicle is righted and any spillages have been cleared as described in Section 5.3.

## **6.0 CONTINUAL IMPROVEMENT**

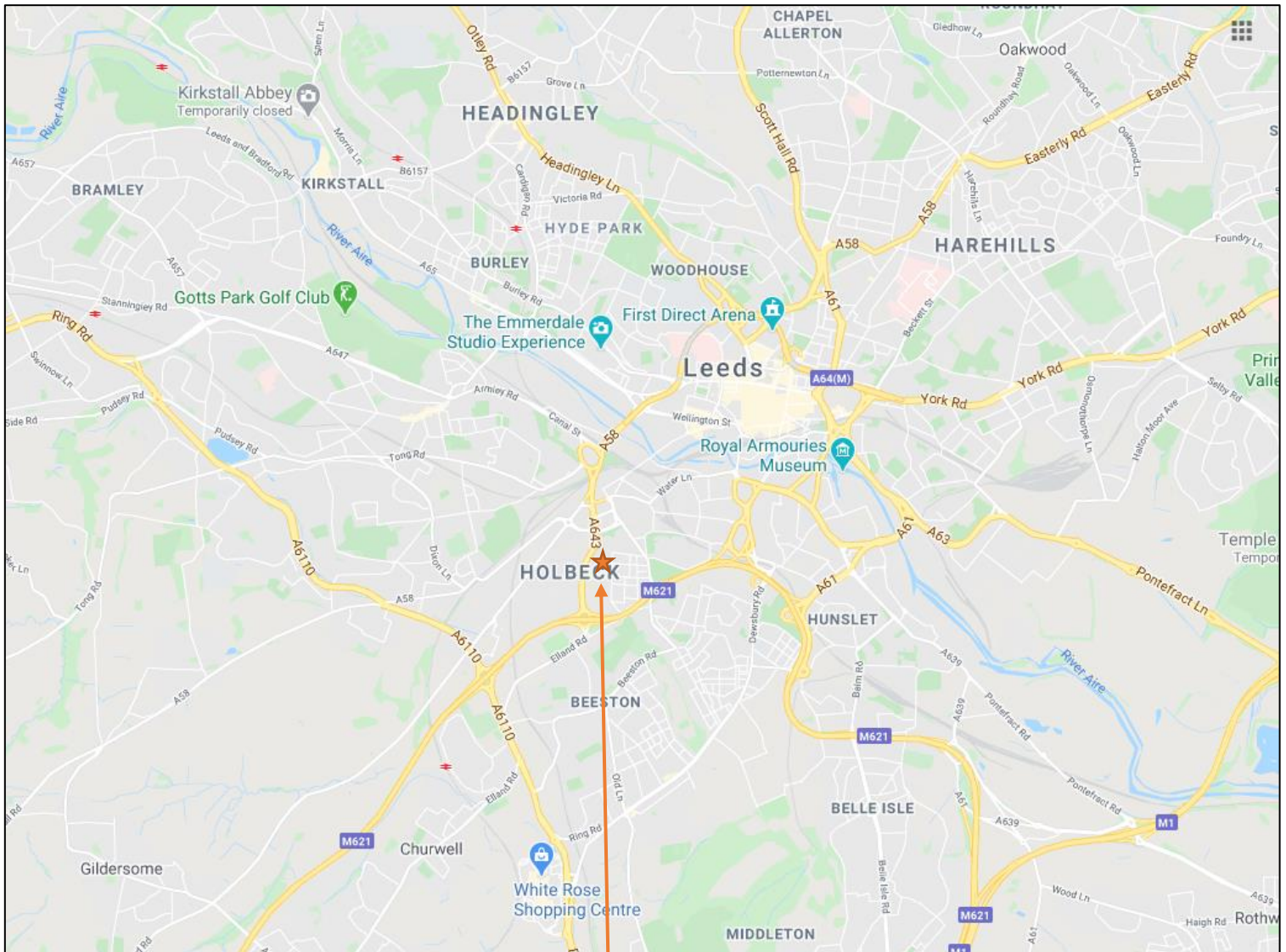
### **6.1 Review**

- 6.1.1 C O'Donovan & Sons Ltd are dedicated to continually improving site operations through investment and modification in staff and infrastructure. This Environment Management System is due for review before the end of August each year. The next review is to be carried out prior to 31 August 2021. Any amendments made to this plan will be sent to the Environment Agency for their consideration and incorporation into the environmental permit.

# **APPENDIX 1**

## **DRAWINGS**

**Drawing No. COD/EMS/01 - Site location map**

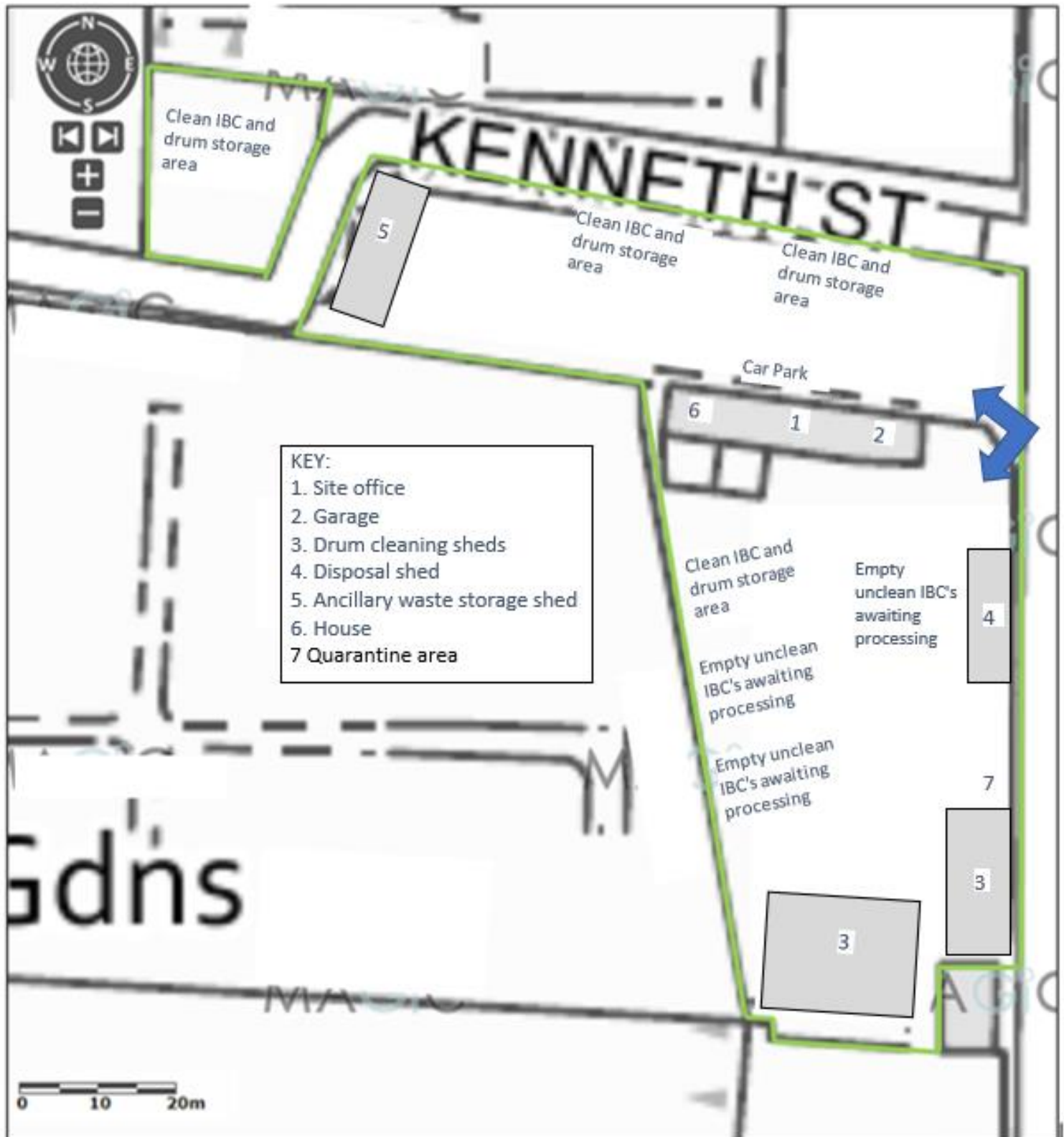


C O'Donovan & Sons Ltd, Ingram Road, Holbeck, Leeds

**Drawing No. COD/EMS/02 - Permit boundary plan**

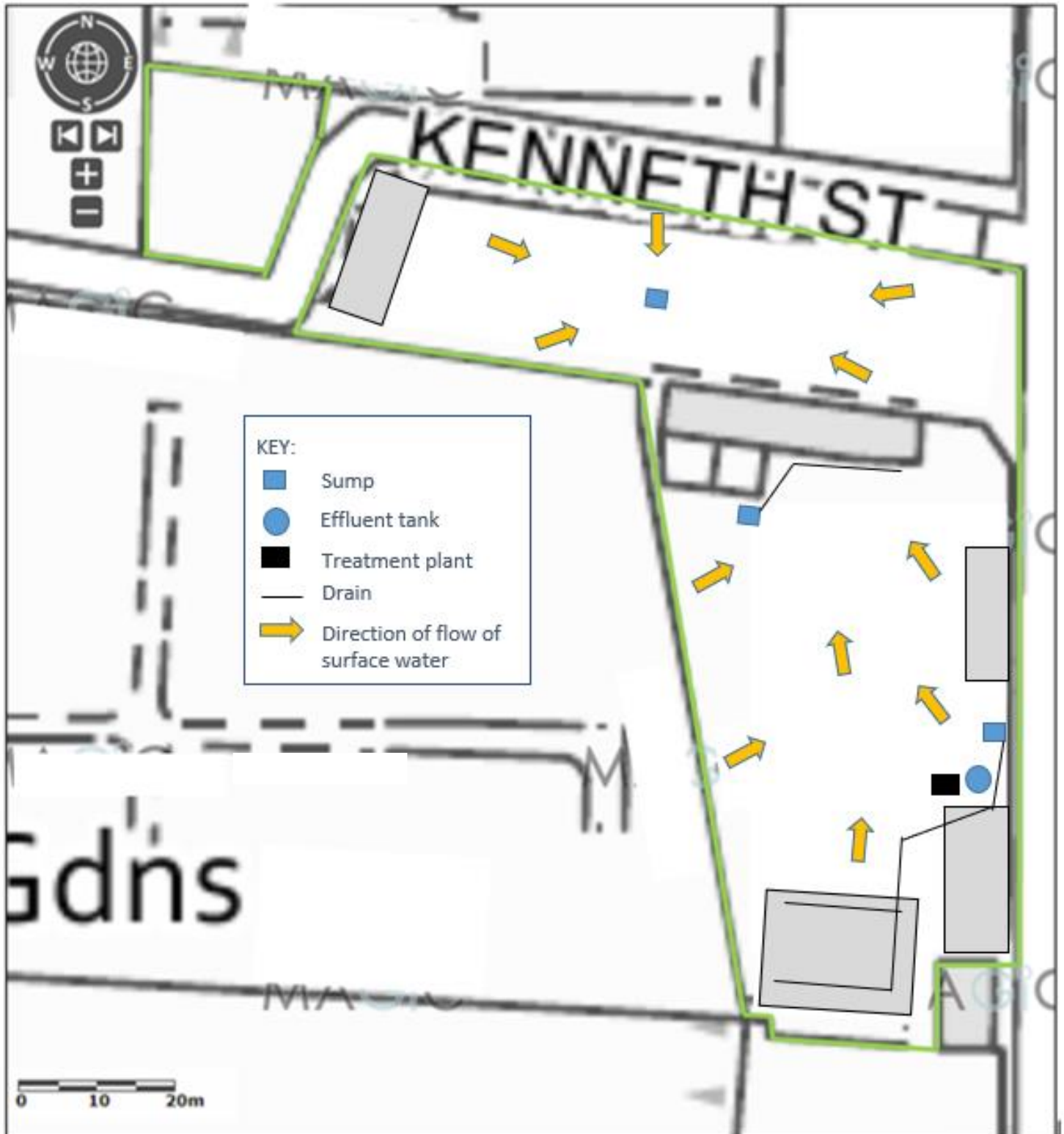


**Drawing No. COD/EMS/03 - Site layout plan**





**Drawing No. – COD/EMS/04 Site drainage current and proposed**



## **APPENDIX 2**

### **TECHNICAL COMPETENCE CERTIFICATES**

# WAMITAB

Waste Management Industry Training and Advisory Board

Certificate No: 12756

## CERTIFICATE OF TECHNICAL COMPETENCE

*This Certificate confirms that*

Douglas Morrison

*Has demonstrated the standard of technical competence required for the  
management of a facility of the type set out below*

*Facility Type*

Level 4 in Waste Management Operations -

Managing Treatment Hazardous Waste (4TMI)

Authorising Signatures:

Chief Executive Officer

Director:

Date of issue:

13 September 2012



00019260



## Continuing Competence Certificate

This certificate confirms that

Douglas Morrison

Has met the relevant requirements of the Continuing Competence scheme for the following award(s) which will remain current for two years from 31/07/2020

TSH	Transfer - Hazardous Waste
TMH	Treatment - Hazardous Waste
TMNH	Treatment - Non Hazardous Waste

**Expiry Date:**  
**31/07/2022**

Verification date: 22/07/2020

Authorised:

Learner ID: 19821

Certificate No.: 5167735

Date of Issue: 31/07/2020

A handwritten signature in black ink, appearing to read "Alan James".

WAMITAB Chief Executive Officer

A handwritten signature in black ink, appearing to read "Alan James".

CIWM Chief Executive Officer



The Chartered Institution  
of Wastes Management



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