



RECYCLING OPERATIONS | ENVIRONMENTAL MANAGEMENT PLAN

Luton

Local Recycling Global Responsibility
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ENVIRONMENTAL MANAGEMENT PLAN

FRC (CGC)-EMP – Recycling Operations



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1. INTRODUCTION

1.1. Environmental management system

- 1.1.1. This document is written in accordance with the developing a management system for environmental permits guidance last updated 31 August 2022 ([gov.uk](https://www.gov.uk)).
- 1.1.2. The Luton site is included in the 14001:2015 certification scope. ([Appendix 1](#))
- 1.1.3. The objectives are to process waste so as to maximise the quantity of recovered recyclables and minimise residual waste disposed of to landfill; ensure that waste processing operations are carried out in accordance with relevant regulatory requirements; identify and minimise the risk 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.

1.2. The site

Permits holder: **F&R Cawley Ltd. t/a Cawleys**
H.O. address: **1 Covent Garden Close, Luton, Bedfordshire, LU4 8QB**
Telephone: **0845 260 2000**
Company reg. no.: **4170234**
SIC code: **38.11**

1.2.1. Luton

Address: 1 Covent Garden Close, Luton, Bedfordshire, LU4 8QB
Site type: A11- Household, Commercial & Industrial Waste
EA environmental permit no.: MP3397NF/V003
EA exemption no.: T11 NC2/061729 exp. 19/10/2023
EA ABE approval no.: BE2210516BE / EA ABTO approval no.: BS2210608BS
Site grid reference: TL0691723177
Site plan ref.: GPP-C-L-22-03 ([Appendix 2](#))
Permitted hours of operation: Weekdays 06:00 to 24:00, Weekends and Bank holidays 06:00 to 13:00.

1.3. Infrastructures

- 1.3.1.1. The permit holder owns the property freehold and is in occupation of the land which is being used as a waste recycling and transfer facility.
- 1.3.1.2. The site is of an irregular shape occupying approximately 1 hectare in size with a longitudinal axis running north-south between Selbourne Road and Wingate Road, Luton. The land has planning permission for the waste recycling and transfer activities issued by Bedfordshire County Council.
- 1.3.1.3. Road access to the site is off Wingate Road and Covent Garden Close (a short connection road to Selbourne Road) and is constructed in concrete and asphalt.
- 1.3.1.4. The surrounding area is a mix of commercial property and residential dwellings.
- 1.3.1.5. The activities on site were initially covered by the waste management license no. 80461 issued by the Environment Agency. These comprise the reception, handling, keeping, treating, recycling and transfer of waste.
- 1.3.1.6. The site is equipped with flood lighting and recorded CCTV surveillance system.

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- 1.3.1.7. The site displays an identification board containing site name and address, operator name, licence number, emergency contacts and the permitted hours of operation. In the event of damage or defect, the board shall be replaced within 3 working days.

1.4. Site security

- 1.4.1. The site is enclosed on all sides by fencing/walls. The entrances have full height lockable gates.
- 1.4.2. The access gates are locked when the sites are not operational.
- 1.4.3. The offices at Luton have an intruder alarm which is monitored 24/7 by an external organisation who are able to alert the keyholders out of hours.
- 1.4.4. The sites are internally and externally monitored by using recorded CCTV.

1.5. Engineered surface water management systems

- 1.5.1.1. Existing road access ways and hard standing areas within the site are constructed of consolidated hard core overlain with tarmac and mass concrete and these areas are kept in good condition and improved upon as necessary to maintain the environmental protection system of the site. Concrete is used wherever there is heavy loading or usage, asphalt is used for lighter duties. Both are laid on a substantial consolidated hardcore base as appropriate.
- 1.5.1.2. The car parking area is laid to drain to two soakaways, this area is not used for any waste storage except the siting of a skip beneath the end of the wood conveyor.
- 1.5.1.3. The waste reception, recycling, storage, and handling areas are within a purpose designed building with a heavy duty smooth and abrasion resistant concrete floor.
- 1.5.1.4. Waste storage and loading bays are constructed on impermeable concrete surfaces. There is one bay for mixed untreated wood, grades A, B and C; this bay is segregated by concrete legato blocks (each weighing approx. 2 tonnes) which have been accepted by the Fire Insurance Industry as providing sufficient fire containment.
- 1.5.1.5. The paved areas of the site are laid to falls and connected to existing Local authority drains via approved system of drainage as appropriate and as detailed in the attached appendices. The company has discharge consent and periodically monitors outflow volumes and composition to ensure that it remains within the consent requirements.
- 1.5.1.6. Waste handling, temporary storage including the storage of recyclable bales is carried out on an impermeable reinforced concrete apron. Water run-off is via gully's leading to an underground storage tank which has a capacity of 1000ltrs. The contents are emptied as required by a tanker.
- 1.5.1.7. Within the waste reception tipping aprons areas, the floors are laid to fall towards the entrance. Water run-off is to an underground holding tank in the South Eastern corner of the tipping area. This will ensure that any potentially contaminated run off from these containers are securely held for analysis and the appropriate treatment selected before being removed from site by tanker.
- 1.5.1.8. The culvert holding tank has a capacity of 100,000 litres with a shut off valve at its 'out' position on the drainage plan.

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- 1.5.1.9. Cleaning of mobile plant is carried out using a high-pressure jet wash system when necessary in an area which utilises the site's interceptor.
- 1.5.1.10. The extension area to the permit is surfaced with impermeably pavement with drainage to surface water sewer as shown on the attached appendices. Only waste that is contained awaiting collection is stored in this area in wheeled containers.
- 1.5.1.11. The site has a discharge consent in place T.E. case no.: TEHY0367. (Appendix 3)
- 1.5.1.12. Surface water drainage plan drawing reference GPP-C-L-15-06. (Appendix 4)
- 1.5.1.13. Foul drainage plan drawing reference GPP-C-L-15-07. (Appendix 5)

1.6. Vulnerable receptors

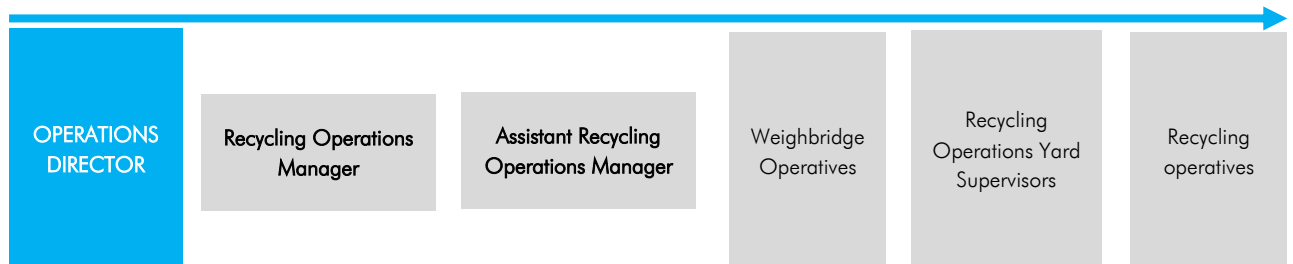
The site receptor plans identify the locations that are potentially vulnerable to pollution and emissions (1 km radius).

1.6.1. Luton sensitive receptors (Appendix 6)

Receptor	Distance
Residential properties	150m
Industrial premises	Various within <100m
Railway line	200m NE
Watercourses	River Lea >1km N
Education	Various within 1km radius
Healthcare	Various within 1km radius

2. SITE MANAGEMENT

2.1. Management structure



- 2.1.1. The Operations Director has overall responsibility the recycling operations and maintaining the appropriate licences.
- 2.1.2. The Recycling Operations Managers are responsible for implementing the EMS procedures, monitoring quantities of waste entering and leaving site, and submitting EA quarterly returns.
- 2.1.3. The Assistant Administration Manager is responsible for the sale of all recycled materials recovered from the MRF, ensuring stock levels on site are kept to a minimum.
- 2.1.4. The Weighbridge Operators are responsible for recording all incoming and outgoing wastes in the system and reporting any issues with the receipt of waste to the Recycling Operations Manager.

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2.1.5. The Recycling Operations Yard Supervisors are responsible for covering the site operations manager role during periods of absence due to illness or annual leave. Working with the site operations manager to ensure the site runs in accordance with all company procedures and legislative requirements and ensuring all staff also do so.

2.1.6. The Recycling Operatives are responsible for the day-to-day recycling operations.

2.2. Technical competence (TCM)

The recycling operations are managed by technically competent personnel as required by the Environmental Permitting (England & Wales) Regulations 2016.

2.3. Training

2.3.1. Competence and training required is determined commensurate with individual roles. All site staff undergo an induction that identifies the procedures and practices that the Company operates. Operative training includes RAMS, work instructions, mobile plant training, fire management, first aid, etc. Management and Supervisory training include COTC and IOSH Managing Safely, etc.

2.3.2. Evidence of an employee training / competence e.g. diplomas, licences, training certificates, performance reviews, alongside other data are kept as documented information on the online Smartlog system maintained by the SHEQ Department.

2.3.3. The employee's competence is confirmed by reviewing the appropriate required education, training or experience through interviews, observation, periodic appraisals, etc.

2.4. Non-conformance and corrective action

2.4.1. The Company is committed to a proactive evaluation of opportunities for improvement. Reactively, the Company takes action to investigate non-conformances (internal/external), determine the root cause(s) and plan actions to prevent reoccurrence.

2.4.2. Any nonconformities are logged on REG-008 Corrective Actions Requests Register maintained and monitored by the SHEQ department.

2.5. Monitoring, measuring, and reviewing the environmental performance.

2.5.1. The EMS is audited on an ongoing basis both internally through the internal audit programme and externally by the ISO 14001:2015 certification body, the Environment Agency and/or any other interested parties.

2.5.2. The EMS performance, including the progress against set objectives, is reviewed as part of the IMS management review and also as part of the SHEQ management monthly review meetings.

2.5.3. Recycling targets, plant availability, landfill diversion monitored at the weekly SMT by Top Management.

2.6. Environmental policy

2.6.1. The environmental impacts of the operations are given the upmost consideration at procurement and through the life cycle of all projects and joint venture opportunities. Sustainability of materials, and a real commitment to carbon emission reductions are key to the progress and ensures compliance to legislation and the requirements of ISO 14001:2015.

2.7. Maintenance of site infrastructure and equipment

2.7.1. An inventory of plant and equipment is maintained by the SHEQ department. All statutory inspections are planned and completed in line with LOLER'98, PUWER'98, etc.

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- 2.7.2. Daily mobile plant checks are being undertaken by onsite recycling operatives and recorded in the R2C system.
- 2.7.3. Daily/weekly site inspections are being undertaken by onsite Recycling Operations Supervisors/Managers and recorded on FRC-021 SHEF inspection report form kept on site.
- 2.7.4. All plant, equipment or machinery are serviced only by trained, competent and authorised personnel in accordance with the manufacture's recommendations. Records are retained at site level.

2.8. Complaints

- 2.8.1. All environmental complaints/incidents are logged and monitored by the SHEQ Department (REG-029 Environmental Incident Register; FRC-035 Feedback/Complaint Report. All documented information in relation to environmental complaints/incidents is kept in digital format on a shared computer drive.
- 2.8.2. Complaints/incidents are analysed by nature of complaint and summary data produced for identification of any trends.

2.9. Documented information

- 2.9.1. Internal documented information relevant to the EMS (e.g. procedures, work instructions, forms, RAMS, policies, registers, etc.) is maintained, retained, and controlled by the SHEQ Department, ensuring that this is adequately protected from deterioration, loss, or unauthorised changes.
- 2.9.2. Other documented information (e.g. waste transfer notes, consignment notes, EA returns) will be retained digitally either in Dataset/Precia (waste management information systems), online customer portal, and/or as scanned copies saved on a shared computer drive.
- 2.9.3. A diary is retained on each site to record duty time of onsite COTC, abnormal or unusual events requiring action or deviation from procedures, corrective actions, customer complaints/incidents, emergencies, fires, vehicle/plant breakdown and actions taken, other observations and comments that would help to improve the recycling operations (WASTELOG-01 Luton).
- 2.9.4. Weekly site inspection reports are kept at site level – hard copies (FRC-021 SHEF Inspection Report).

2.10. Notifications

- 2.10.1. All significant incidents to be notified to the Environment Agency as soon as reasonably practicable on 0800 80 70 60 but must be within 24 Hours.
- 2.10.2. The Environment Agency shall be notified without delay following the detection of:
 - 2.10.2.1. Any malfunction, breakdown or failure of equipment or techniques, accident or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution.
 - 2.10.2.2. The breach of a limit specified in the permits.
 - 2.10.2.3. Any significant adverse environmental effects.
 - 2.10.2.4. Schedule 5 of EPR MP3397NF/V003 outlines the information required by the EA.
- 2.10.3. If requested by the Environment Agency, the operator shall inform the EA when relevant monitoring and/or spot sampling is to take place at least 14 days prior to the date this is due to be undertaken.

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2.10.4. Any changes in the technically competent management of the site and the name of any incoming person (together with evidence of required technical competence) shall be submitted to the Agency in writing within 5 working days of the change in management.

2.10.5. The operator / TCM continually monitor the site's individual layouts in order to optimise its operations and will notify the Environment Agency of any further amendments to the EMS once they are identified.

2.11. Reporting

2.11.1. Within one month of the end of each quarter, the Recycling Operations Manager(s) shall submit to the Environment Agency the information relating to the site and the waste accepted / removed from it during the previous quarter.

2.11.2. There are no emission limits or associated monitoring requirements and no reporting is required under this.

3. RECYCLING OPERATIONS

3.1. Waste hierarchy

3.1.1. Appropriate measures are in place to ensure that the waste hierarchy referred to in Article of the Waste Framework Directive is applied to the generation of waste by our activities and disposal is undertaken in a manner which minimises impact on the environment.



3.2. Duration of Activities – Ground Water Protection (GWP)

The facility will be operated indefinitely. The pre-existing groundwater quality and geological details of the site are not known to the operator however none of the land on the site is believed to be contaminated. It is not believed that there are any boreholes or water courses within one kilometre of the site.

3.3. Staffing and Supervision

The terms of the site permit conditions have been made known to all members of staff given responsibility for the management or control of the site and a full copy of the site permit is available to all concerned.

3.3.1.1. The MRF office is occupied during normal office hours 06:00 to 1700. Outside of these hours the maintenance team are on site until 02:00 carrying out plant maintenance.

3.3.1.2. The normal staffing for the site during day operations is as follows:

- ▶ Recycling Operations Manager
- ▶ Recycling Operations Assistant Manager
- ▶ Yard Supervisor
- ▶ Administration Manager
- ▶ Weighbridge Operator
- ▶ SCADA (Control Room) Operator
- ▶ Mobile Plant Operators
- ▶ RDF Baler Operator & Recycling Baler Operator
- ▶ Recycling Operatives / Cleaning Staff.

3.3.1.3. The normal staffing for the site during late operations is as follows:

- ▶ MRF Engineer

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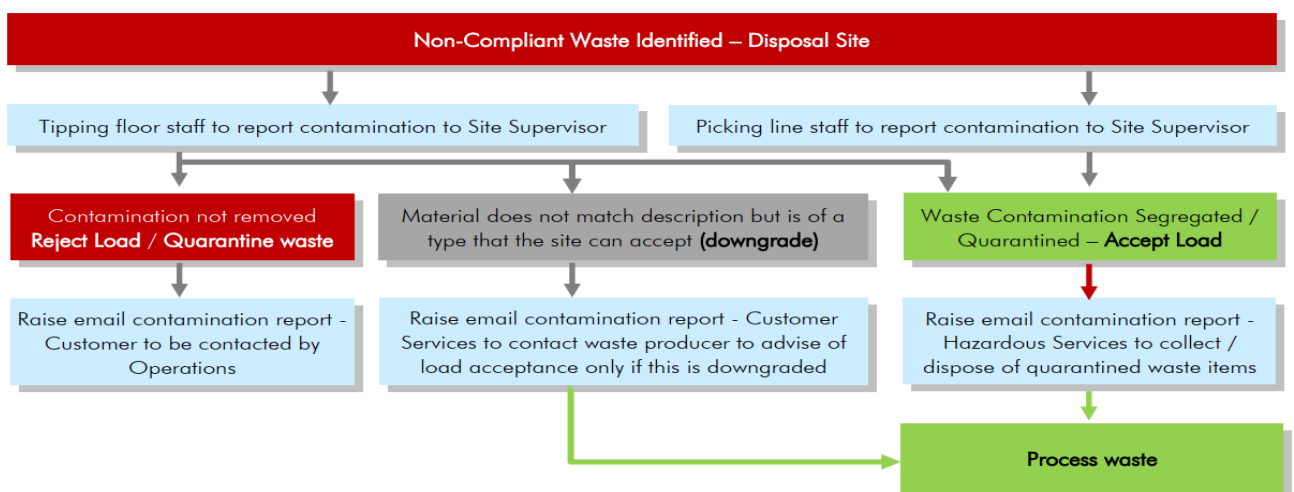
- 3.3.1.4. In addition to recycling operations, the following departments are based in the offices adjoining the MRF: Customer Services, Account Management, Company Directors, Finance, Sales, IT, SHEQ/Compliance and HR. Within the site there is a Fabrication / Engineering Workshop (which maintain the MRF and the containers / equipment), a Vehicle Workshop (which maintains the company's fleet of vehicles) and a Lithium Battery Treatment area. There are also various storage buildings as detailed on the site drawing
- 3.3.1.5. Non-employees, contractors and visitors to site are directed to the reception office where they are logged in and provided with a copy of the site rules applicable to access to the site. High visibility clothing, hardhats and safety footwear are required to enter the site's operational areas. Any visitors who do not have the correct personal protective equipment to enter the site will be issued with it where required.

3.4. Permitted wastes

- 3.4.1.1. The facility is licensed for a total annual throughput of 143,000 tonnes per annum and has the capability and space to handle this quantity comfortably. In the main tipping hall up to 600 tonnes of unprocessed primary material can be stored.
- 3.4.1.2. Table S2.1 of the EPR MP3397NF/V003 lists the permitted waste types and quantities (EWCs).

3.5. Waste reception – acceptance/rejection procedures

- 3.5.1. All incoming wastes shall be tipped prior to processing and must be inspected to verify waste type and check for non-compliant wastes. Non-compliant waste may be identified at any stage during weighing, tipping, baling, or loading. Any non-compliant wastes shall be segregated pending disposal route decision.
- 3.5.2. For wastes identified as not being as described on the waste transfer note, the load shall be deemed as contaminated and photographed. A contamination report must be issued to Customer Services for investigation / action to try preventing further contaminated loads on site.
- 3.5.3. To ensure that waste processing operations are carried out correctly the following acceptance procedure is carried out using the following process maps:



- 3.5.4. The sites and the waste reception areas are staffed at all times when tipping takes place. Waste reception staff in the tipping area record all incoming material and all non-conforming material types.

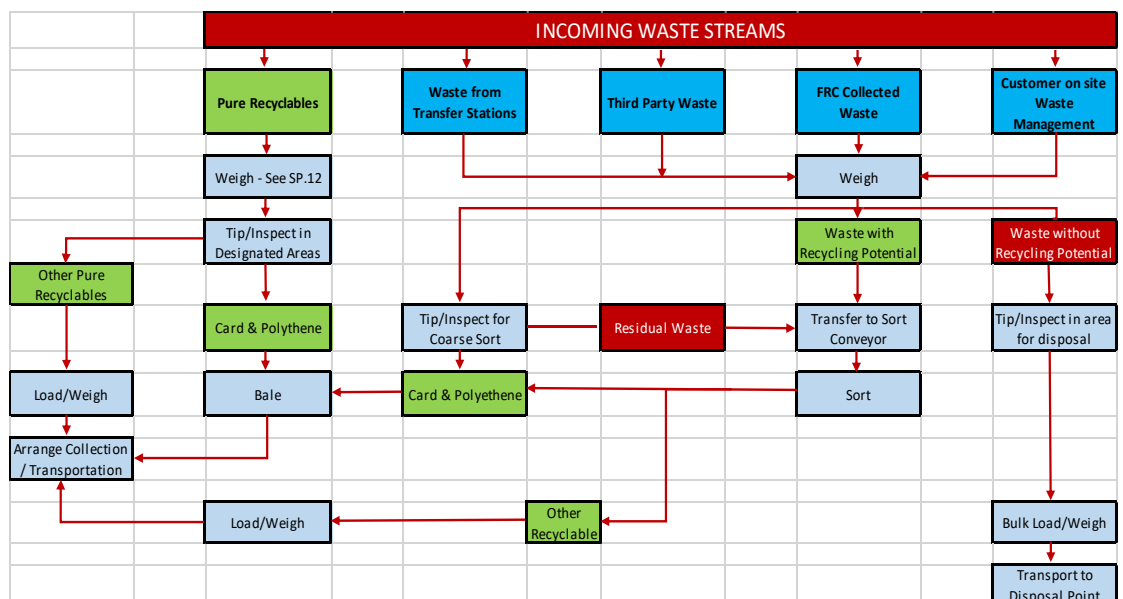
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- 3.5.5. Waste is delivered by third party vehicles or the Company's own vehicles. The Company's own vehicle drivers inspect the waste at the point of collection prior to its arrival at the transfer station and will deal with any problems of unacceptable waste at source so that the appropriate disposal route is adopted.
- 3.5.6. Designated incoming wood loads are tipped in front of the wood bays marked on the site plan.
- 3.5.7. Third parties delivering wastes and recycled materials to the site will report to the Weighbridge office and are also given a copy of the site rules on their first visit. Failure to comply with the site rules may result in access being denied on subsequent occasions.

Sample incoming waste process flow.



3.6. Mirror codes

- 3.6.1. To assess whether the waste has a hazardous property, its composition needs to be known first. This information can be obtained:
 - ▶ from the manufacturer's safety data sheet if the waste is a manufactured product whose composition has not changed.
 - ▶ when the waste is from a well understood industrial process and the composition of the wastes produced are well understood.
 - ▶ by sampling and analysing the waste to determine its composition according to WM3 - Appendix D.
- 3.6.2. Once the chemical composition has been determined, these can be categorised in 'hazardous substances' or persistent organic pollutants (POPs). Where the composition of a mirror entry waste is not known and genuinely cannot be determined, the mirror entry waste must be classified under the 'mirror hazardous' entry.
- 3.6.3. Where applicable, a new classification code will be assigned, the hazardous properties described, and a consignment note raised. When the waste does not display a hazardous property, and does not contain POPs, the 'mirror non-hazardous' code can be kept.

3.7. Recycling processes

3.7.1. All waste is weighed before entering the site by electronic calibrated weighbridges. There are three weighbridges at Luton, two at the waste reception area (in and out) and one located at the rear of building to be utilised by the RDF off-takers.

3.7.2. Luton recycling operations

3.7.2.1. The full activities description and limits for site waste operations are detailed in table S1.1 of the EPR MP3397NF/V003.

3.7.2.2. The site MRF objective is to process waste as to maximise the recovered recyclables and minimise residual waste.

3.7.2.3. All suitable waste is fed from the 360° material re-handler into the feed hopper situated in the waste reception hall. This is a vibrating screen which regulates the flow of the waste to assist with a level flow onto the incline belt into the trommel.



Img.1 Loading of the Feed Hopper

3.7.2.4. The waste is then passed via an elevated feed conveyor into a sorting trommel; this sorts the material, by size into four different streams.

3.7.2.5. The first stream which is of a small nature will first pass under a magnet to remove any ferrous metals, it then continues to pass over the ballistic separator 'flip flop' screen to separate out small soils / inert material. The next stage for this line will be to pass into the main large picking cabin for manual sorting. This line can be diverted to pass through the air-knife and TiTech system when appropriate.

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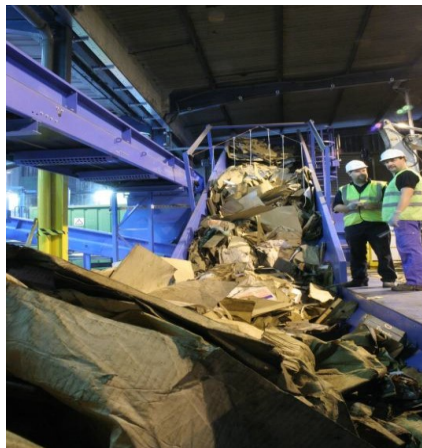
Img.2 Magnetic Separators

- 3.7.2.6. The second stream goes under a magnet to remove any ferrous metals. This then passes through the air-knife (fan system) which separates the light from the heavy fractions. The light material passes through the two TiTech sortation systems (optical automated sorting systems) which are currently set to pick out paper thread material with the remainder unpicked going through the small picking cabin for manual sorting.
- 3.7.2.7. The third and fourth streams will pass through the picking cabins only. As material designated for recovery passes through the picking, it is manually picked from the conveyor belts by the recycling operatives, which is then dropped into the appropriate containment chambers below the cabins.



Img.3 Large Picking Line

- 3.7.2.8. The containment chambers hold the different streams which are baled when a chamber is full. The chamber door will be opened, and the material will be pushed out of the chamber onto the infed inclined conveyor on route to the automatic baler.



Img.4 In feed inclined conveyor

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- 3.7.2.9. Baled materials are ejected onto the processing area floor then transported using a bale clamp to the storage area.



Img.5 Ejected bales



Img.6 Transporting Bales to the Storage Area

- 3.7.2.10. The baler operator and yard person are responsible for the dressing of the bales. This is a practice to ensure that any loose or unsuitable materials are removed prior to storing externally; this will take place on the immediate removal of the bale from the chamber. The storage of the recyclable bales will be limited to mixed paper / card, mixed rigid plastic bales and LDPE (film based) bales.
- 3.7.2.11. Bales leave the site on a variety of transport vehicles e.g., shipping containers, articulated lorries, etc. They are loaded using a Fork- Lift Truck with a Bale Clamp.
- 3.7.2.12. Hardcore material, bricks, rubble, concrete, stones etc is sorted and segregated in the large picking cabin which is then taken on an exterior conveyor belt and stored in its own bay.



- 3.7.2.13. All residual material that has gone through the MRF process and has not been recovered / or not suitable for recovery will go to the rear tipping hall as a loose RDF (refuse derived fuel) product; this is sent to a EFW plant. Walking floor trailers are loaded using a selecta grab. The plant operator loads these trailers to the maximum Gross weight to ensure we utilise our vehicle movements.

3.8. Storage of wastes

- 3.8.1.1. The maximum volume of waste capable of being stored in the waste reception area is 600 tonnes of primary unsorted waste. The transfer area / landfill (back end) is approximately 375 tonnes; the landfill element is material that is none recoverable (bulky) not suitable for recovery or RDF which is roughly one load (25 tonnes) per day.

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- 3.8.1.2. Loose RDF is stockpiled in the back tipping hall, this gets loaded daily and stock rotation is in place.
- 3.8.1.3. The loose unsorted waste material in the reception area is monitored by the tipping floor supervisor / staff along with the Assistant Recycling Operations Manager, who carries out checks on site. The waste is pushed by the loading shovel operative into the loading area for the 360° material re-handler operators to pre-sort the material and then load into the MRF plant, the waste is loaded into the primary screen.
- 3.8.1.4. Waste type tonnages and locations where held:

Waste Type	Max. T storage	Location
Unprocessed primary waste	600	Waste Reception
Landfill (unrecoverable bulky material)	50	Transfer Waste Out
RDF Transfer	300	Transfer Waste Out
Recycled Bales (Mid-grade paper, LDPE)	100	Recycling Baler Area (internal)
Recycled Bales (Mixed Paper, Rigid Plastics, Card)	100	Concrete Block Bays (external)
Wood	72	Concrete Block Bays (external)
POP's	30	Concrete Block Bays (external)
Tyre skips x 2 (commercial / domestic)	10	Yard Area (contained in skips)
Mixed Metal Roll On/Off x2	6	Yard Area (contained in roll-on's)

- 3.8.1.5. The RDF make-up comprises of light fractions including paper, plastics, card, textiles, and small pieces of wood. Exclusions include any metals, food waste and glass.
- 3.8.1.6. Recyclate Bale Storage: The recycled bales are stored in various areas based upon either potential environmental or commercial impacts. Medium Grade Mixed Paper is collected weekly. The area is loaded / unloaded from right to left; this ensures that all bales are removed within two weeks of generation.
- 3.8.1.7. Outside Storage: mixed Rigid Plastic Bales/Card Bales/Mixed Paper Bales are contained in outside storage bays. All bales are loaded on a rotational basis, with loads booked weekly for removal and the older bales removed / loaded first. The bales are always placed into the bay from left to right, on loading the bales from the left-hand side will be loaded first and then loading progressively to the right. The bales will only be stored on the outside bale storage area marked on the site plan; the bays will be made up of concrete legato blocks, each bay is only large enough to hold one load + 20%. This area is connected to the contained drainage system. Bales will be checked daily for damage. In the event that damaged bales are identified, they will be re-baled.
- 3.8.1.8. Wood storage: Experience has shown that wood stock-pile areas are completely emptied not less than once a month.
- 3.8.1.9. External skip storage: The metal Roll/Off containers are exchanged when full.

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3.9. Mobile plant and equipment

Mobile plant maintenance is carried out periodically only by trained, competent and authorised personnel and in accordance with the manufacturer's instructions.

- 3.9.1.1. The site uses 3 x wheeled 360° material re-handlers equipped with Selecta grabs, and a wheeled loading shovel for handling, sorting, and loading of the wastes. These machines are continuously used in the following areas:
- ▶ 1 x loading shovel in waste reception hall manoeuvring the tipped waste and pre-sorting.
 - ▶ 1 x 360° material re-handler in waste reception hall pre-sorting and feeding the MRF.
 - ▶ 1 x 360° material re-handler in waste out hall loading of vehicles (back end).
 - ▶ 1 x 360° material re-handler in yard area loading of vehicles (wood Lorries).
 - ▶ 3 x clamp trucks moving bales, loading of vehicles.
 - ▶ 2 x forklift trucks – moving of containers, unloading / loading vehicles.
- 3.9.1.2. Additional plant is hired as necessary depending upon the operational requirements of the site and volumes being processed.

3.10. Potentially polluting leaks and spillages

- 3.10.1.1. Diesel used for the site plant, is stored in one above ground purpose-built tank. This is located near the Lithium-ion Battery Building and is double skinned. Regular inspections of the tank are carried out to ensure they keep their environmental integrity.
- 3.10.1.2. Adblu is stored next to the Helios system in a fully bunded tank, oils etc are stored on drip trays underneath the Scada cabin inside the MRF.
- 3.10.1.3. In case of any spillage, appropriate spill kits are used to contain and clean up the spillage. This includes any spillage from site vehicles; there are trained staff who can deal with any spill on the site.

3.11. Accident Prevention Plan

- 3.11.1. The Company employs a full time SHEQ Manager who holds a Diploma in Environmental Management.
- 3.11.2. The Company has defined Risk Assessments and Safe systems of Work for each process activity.
- 3.11.3. There are periodic site safety tours and internal audits carried out which means that the operation is frequently reviewed to ensure that the defined methods of work are being followed and that staff are working safely.
- 3.11.4. Staff are actively encouraged to raise their concerns and there is a near miss reporting procedure in place.

4. ENVIRONMENTAL CONTROLS AND MONITORING

4.1. Fire prevention plans (FPP)

- 1.1.1. The Fire Prevention Plans (FPP) are written using the Environment Agency's (EA) 'Fire Prevention Plan Guidance – updated 11th January 2021'. The FPPs will form part of the Environmental Management System. The objective of these plans is to:
- ▶ Minimise the likelihood of a fire happening
 - ▶ Aim for a fire to be extinguished within 4 hours, and
 - ▶ Minimise the spread of fire within the site and to neighbouring sites.
- 1.1.2. The FPPs detail the fire risks and the controls put in place to ensure so far as is reasonably practicable that fires do not occur or, if they do occur, there are adequate precautions in place to minimise the environmental impact by minimising the amount of polluting material released into the atmosphere and

ensuring that polluting materials do not enter water courses or significantly affect adjacent sensitive receptors.

4.2. Pest control

4.2.1. The site is treated by a recognised pest management company every two weeks to deal with vermin and vectors. The site is inspected weekly by site staff for initial signs which could lead to nuisance or pollution. The main pests are mice and rats. Strategically placed bait boxes containing poison are placed around the site. These are inspected for takes and refilled on a two-weekly basis.

4.2.2. Electric insect management units are fitted strategically across the facility to deal with flies.

4.2.3. Due to the enclosed nature of the operation at Luton, bird infestation has not been an issue as there is no requirement to introduce further control measures.

4.3. Control of litter

4.3.1.1. The site benefits from being located within a built-up area which does not see too much of windblown material leaving the site. There is a yard supervisor along with yard operatives who maintain the litter levels around the site; particular attention is drawn to areas after loading of vehicles which requires a sweep / litter pick after each collection.

4.3.1.2. Tipping of waste will only occur in the waste reception area (internal) or the wood bays (external). The nature of the material tipped externally (i.e. wood) is of heavy constituent so unlikely to cause any litter issues.

4.3.1.3. For vehicles coming into and out of the site the site staff ensures that all vehicles are properly loaded and covered, and drivers share in the responsibility to ensure that their loads are safe.

4.4. Control of dust

4.4.1.1. Dust suppression is achieved in dry conditions by dampening down the surfaces using a simple water spray system as necessary. There is also a dust suppression within the facility. Dust in air testing has been undertaken at the facility and dust levels during normal conditions are below occupational exposure levels detailed in HSE EH 40. Site is wet swept once per week by an external contractor.

4.5. Control of noise and vibration

4.5.1.1. The site is located within an industrial / residential area, so care is taken to the companies' neighbourhood surroundings.

4.5.1.2. All mobile plant is fitted with white noise reversing alarms

4.5.1.3. All vehicles and plant are silenced in accordance with the manufacturer's recommendations, and care is taken to minimise the noise of operations.

4.5.1.4. All reports of noise are investigated and discussed with the complainant along with the Local Authority.

4.6. Control of odours

4.6.1.1. An odour control system has been installed internally which is a UV system which produces Ozone which depletes the odours within the MRF. A monitoring system is in place to record any odour.

ENVIRONMENTAL MANAGEMENT PLAN

FRC (CGC)-EMP – Recycling Operations



- 4.6.1.2. Externally, we continue to use manual spray of a deodoriser around the sites perimeter which is also used on the rear of particularly odorous vehicles after tipping.
- 4.6.1.3. Should there be odour from the site operations detectable beyond the site boundary, appropriate actions will include prompt removal of any offensive waste and use of deodoriser to counteract the odour as necessary. However, on the basis that prevention is better than cure, good management and prompt transfer are the answer to not having odour problems in the first place and that is how the operator operates the site.

4.7. Control of mud and debris

- 4.7.1.1. The yard supervisor / operatives will ensure that all vehicles are properly loaded and sheeted before leaving the site and drivers share in the responsibility to ensure that their loads are safe. As the ground is made up of hard standing tarmac or concrete it is unlikely that mud or debris from the site will find its way onto the public highway however in the unlikely event that deposits are made on the highway by vehicles leaving the site, then appropriate action to clear it will be initiated.
- 4.7.1.2. The yard area is periodically swept after loading of the vehicles and at the end of the day to ensure that the yard area is clear and free from debris. The whole yard area is swept each week by a contracted road sweeper to prevent carriage of mud and/or debris on the public highway.

4.8. Climate Change and effects on the Environmental Management System.

- 4.8.1. It is anticipated that RDF output will remain roughly the same over the next ten to twenty years. Whilst the United Kingdom is moving to renewable energy sources solar, wind etc the growth of energy from waste plants has increased in the last ten years as a viable alternative to power stations fuelled by conventional fossil fuels such as oil or coal.
- 4.8.2. We anticipate that recycling rates will steadily increase over the next ten to twenty years with some new technologies emerging to look to repurpose waste traditionally recycled. One example of this the repurposing of electric vehicle power packs where some organisations are evaluating the re-use of these as electric accumulators in energy storage and distribution systems.


4.9. Protected species

- 4.9.1. We are not aware of any protected species within a 1 km of our sites.

ENVIRONMENTAL MANAGEMENT PLAN

FRC (CGC)-EMP – Recycling Operations



EMP reviewed by: Nigel Ingram
Operations Director Signed:  Date: March 2023

EMP reviewed by: Amanda Clark
Compliance Manager Signed:  Date: March 2023

The EMP will be reviewed on an ongoing basis throughout the lifetime of the permit(s) and/or in the event of any changes to sites operations, permit conditions or after any relevant incidents, accidents, and/or complaints.

ENVIRONMENTAL MANAGEMENT PLAN

FRC (CGC)-EMP – Recycling Operations



5. LIST OF APPENDICES

- ▶ Appendix 1 – BSI 14001:2015 certificate
- ▶ Appendix 2 – GPP-C-L-22-03 Luton Site Layout Plan
- ▶ Appendix 3 – GPP-C-L-15-06 Luton Surface Water Drainage Plan
- ▶ Appendix 4 – GPP-C-L-15-07 Luton Foul Drainage Plan
- ▶ Appendix 5 – GPP-C-W-17-08 Drainage Plan
- ▶ Appendix 6 – Sensitive Receptors Luton

Certificate of Registration

ENVIRONMENTAL MANAGEMENT SYSTEM - ISO 14001:2015

This is to certify that:

F & R Cawley Ltd
1 Covent Garden Close
Luton
LU4 8QB
United Kingdom

Holds Certificate Number:

EMS 522031

and operates an Environmental Management System which complies with the requirements of ISO 14001:2015 for the following scope:

Collection and transportation service for the removal of hazardous and liquid waste products, non-hazardous commercial and industrial dry waste; recycling facility for dry recyclables; customer on site waste management.

For and on behalf of BSI:

Matt Page, Managing Director Assurance - UK & Ireland

Original Registration Date: 2008-06-26

Latest Revision Date: 2022-08-08

Effective Date: 2020-05-13

Expiry Date: 2023-05-12

Page: 1 of 2



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BSI Assurance UK Limited, registered in England under number 7805321 at 389 Chiswick High Road, London W4 4AL, UK.
A Member of the BSI Group of Companies.

Certificate No: EMS 522031

Location	Registered Activities
F & R Cawley Ltd T/A Cawleys 1 Covent Garden Close Luton LU4 8QB United Kingdom	Collection and transportation service for the removal of hazardous and liquid waste products, non-hazardous commercial and industrial dry waste. The provision of a recycling facility for dry recyclables. Customer on site waste management.
F & R Cawley Ltd T/A Cawleys Haversham Bank Sidings Old Wolverton Road Old Wolverton Milton Keynes MK12 5NL United Kingdom	Collection and transportation service for the removal of non-hazardous commercial and industrial dry waste. Transfer Station.
F & R Cawley Ltd T/A Cawleys Neilson Road Off Paterson Road Finedon Road Industrial Estate Wellingborough NN8 4BZ United Kingdom	Collection and transportation service for the removal of hazardous and liquid waste products, non-hazardous commercial and industrial dry waste. Transfer Station.
F & R Cawley Ltd T/A Cawleys Wastesolve Ltd 1 Covent Garden Close Luton LU4 8QB United Kingdom	National waste management services.
F & R Cawley Ltd Unit J Park Avenue Industrial Estate Luton LU3 3BP United Kingdom	Collection and transportation service for the removal of non-hazardous commercial and industrial dry waste.

Original Registration Date: 2008-06-26

Effective Date: 2020-05-13

Latest Revision Date: 2022-08-08

Expiry Date: 2023-05-12

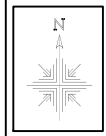
Page: 2 of 2

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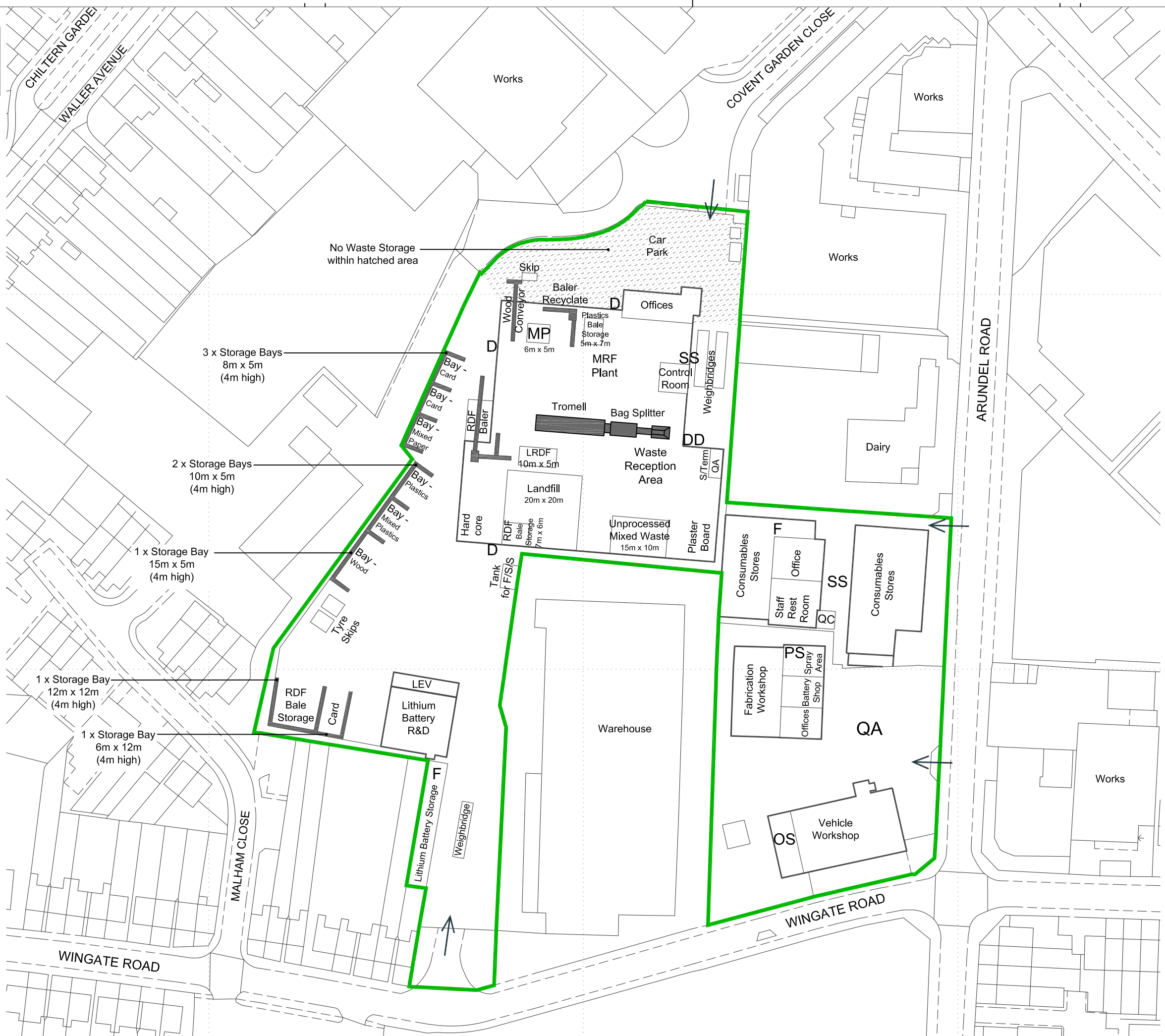
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KEY	
S/Term QA	Short Term Quarantine Area
QC	Quarantine Container - Gas Bottles
Tank for F/S/S	Proposed Site for Tank for Fire Suppression System
QA	Quarantine Area in the event of a Fire
SS	Smoking Shelters
D	MRF Door
↗	Access Points
F	Fuel Storage
OS	Oil Storage
MP	Mixed Paper Bales
LRDF	Loose RDF
PS	Paint Store

No areas of made ground.
 Total site surfaced with concrete.

1 Amendment to bay uses, QA, fabrication workshop, Lithium battery relocated. Text updated. KD 18/07/22

Rev	Description	Initial	Date

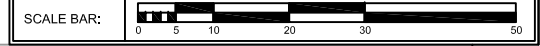
GP
 GP PLANNING LTD
 T: 01604 771123 E: info@gppanning.co.uk W: www.gppanning.co.uk
 ICon Environmental Innovation Centre, Eastern Way,
 Doveney, Northamptonshire, NN11 0CS
 Registered in England No. 6019666

TITLE: Luton Waste Facility
 Covent Garden Close, Luton
 Permit - Site Layout Plan

CLIENT: CAWLEYS

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DRAWING NO.: GPP/C/L/22/03	REV NO.: 1
SCALE: 1:1000 at A3	DATE: 11 July 2022





T.E. Case No: TEHY0367

THAMES WATER UTILITIES LTD.

Water Industry Act 1991

CONSENT TO THE DISCHARGE OF TRADE EFFLUENT

WHEREAS

1. Cawleys Ltd of
1 Covent Garden Close
Luton
Bedfordshire
LU4 8QB

is/are the occupier(s)/owner(s) (hereinafter called "the Applicant") of the trade premises known as

Cawleys Ltd and situate at
1 Covent Garden Close
Luton
Bedfordshire
LU4 8QB

(hereinafter called "the Premises") and by notice dated Thirteenth day of August Two Thousand and Eight has/have made application to Thames Water Utilities Ltd. (hereinafter called "the Company") to consent to the discharge of trade effluent by him/her/them from "the Premises" into the Company's public foul water and/or combined sewers.

2. NOW THEREFORE in exercise of the powers conferred upon it in that behalf as a sewerage undertaker by the Water Industry Act 1991, the Company

HEREBY CONSENTS to the discharge of trade effluent from the Premises into the sewer(s) (as hereinafter defined) subject to the following conditions:

- | | |
|-----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Nature and composition | 1. The nature and composition of the trade effluent (hereinafter called "the trade effluent") to be discharged under this consent is: Waste liquids arising from vehicle washing and washing of wheelie bins and containers and contaminated surface water. |
| Sewer(s) affected | 2. The sewer(s) into which the trade effluent may be discharged is/are the sewer(s) detailed below:

225mm Selbourne Road

No change shall be made in such point(s) of discharge without prior consent in writing of the Company. |
| Maximum quantity to be discharged | 3. The maximum quantity of the trade effluent which may be discharged on any one day of twenty-four hours determined from midnight to midnight shall not exceed 2.000 m ³ . |
| Maximum rate of discharge | 4. The maximum rate at which the trade effluent may be discharged shall not exceed 0.500 m ³ per hour. |



- Matter to be eliminated prior to discharge to the sewer(s)
5. (a) There shall be eliminated from the trade effluent before it is discharged into the sewer(s) any matter, which, either alone or in combination with any matter with which it is likely to come into contact while passing through any sewers, would injure or obstruct any such sewers or cause injury to and/or damage to the health of any person lawfully present in such sewers, pumping stations or sewage treatment works or would make specially difficult or expensive the treatment or disposal of their contents and in particular but without prejudice to the generality of the foregoing words the following matters:-
- (i) Petroleum spirit
 - (ii) Calcium carbide
 - (iii) Thiourea and thiourea derivatives
 - (iv) Non biodegradable detergents
- (b) The trade effluent shall not contain substances listed in Schedule 1 of the Trade Effluents (Prescribed Processes and Substances) Regulations 1989, as amended, at a concentration greater than background concentration as defined in such regulations.
- (c) The trade effluent shall not contain any of the substances listed in APPENDIX 1 at a concentration expressed in milligrams per litre greater than that stated.
- SEE APPENDIX 1
- Temperature 6. No trade effluent shall be discharged which has a temperature higher than 43.3 degrees Celsius (110 degrees Fahrenheit).
- Acidity or alkalinity 7. No trade effluent shall be discharged the pH value of which is less than 6.0 or greater than 11.0.
- Condensing water 8. No condensing water shall be discharged.
- Changes in occupier or process 9. The Applicant of the Premises shall forthwith give to the Company notice in writing of any changes or proposed changes in the company name, address, occupier, or processes of manufacture or the nature of the raw materials used or of any other circumstances which may alter the nature and composition or the volume of the trade effluent or may result in the permanent cessation of the discharge.
- Commencement of Discharge 10. The commencement date of this Consent will be the date the Company acknowledges satisfactory receipt of the Consent duly signed by or on behalf of the Applicant unless otherwise stated and the Applicant must not discharge the trade effluent before the commencement date.
- Payment 11. The Applicant of the Premises shall pay to the Company for the trade effluent discharged into the sewer
- (a) a sum calculated in accordance with the provisions contained in the Company's Charges Scheme together with
 - (b) the amount of any additional expenses which the Company may from time to time incur with respect to the monitoring, analysis, reception, treatment and disposal of the trade effluent.

All sums payable to the Company under this condition shall become due and



payable on demand.

- Entry and samples
12. The Applicant of the Premises shall permit duly authorised representatives of the company to inspect, examine and test at all reasonable times any works and apparatus installed in connection with the trade effluent and to take samples of the trade effluent.
- Inspection
- 13
- (i) An inspection chamber or manhole shall be provided and maintained by the Applicant of the Premises in a suitable position defined in connection with each pipe through which the trade effluent being discharged and such inspection chamber or manhole shall be so constructed and maintained by the Applicant as to enable duly authorised representatives of the Company to take samples at any time of the matter passing into the sewer(s) from the Premises.
- Measurement and determination of discharge
- (ii) A notch gauge and continuous recorder or some other apparatus suitable and adequate for measuring and automatically recording the volume, nature, composition and rate of discharge of the trade effluent being discharged into the sewer(s) shall, if required by the Company be provided and maintained by the Applicant of the Premises to the satisfaction of the Company in connection with every pipe through which the trade effluent is being discharged.
- Records
- (iii) Records in such a form as the Company may require shall be kept of the volume, rate of discharge, nature and composition of the trade effluent discharged into the sewer(s) and shall be available at all reasonable times for inspection by duly authorised representatives of the Company and copies of such records shall be sent to the Company on demand.
- (iv) If the notch gauge and continuous recorder or other apparatus aforesaid ceases to register or measure correctly then, unless otherwise agreed, the quantity of the trade effluent discharged into the sewer(s) during the period from the date on which the records of the volume of the trade effluent discharged into the sewer(s) were last accepted by the Company as being correct up to the date when the notch gauge and continuous recorder or other apparatus aforesaid again registers correctly shall, for the purpose of any payment to be made to the Company, be based on the average daily volume of the trade effluent discharged during the period of one month preceding the date on which the said records were last accepted as aforesaid or during the month immediately after the notch gauge and continuous recorder or other apparatus aforesaid has been corrected, whichever is the higher.
- (v) The foregoing provisions of this condition shall be of no effect so long as there is available to the satisfaction of the Company some other method approved by the Company of sampling the trade effluent or of determining, measuring and recording the volume and rate of discharge and the nature and composition of the trade effluent discharged.
- Vacation of Site
14. The Applicant(s) must notify the Company in writing at least 21 days in advance of the following events:
1. vacation of the Premises by the Applicant for any reason, whether permanent or temporary;
 2. change of ownership or occupation of the Premises;
 3. the Applicant's entry into liquidation whether voluntarily or compulsorily or bankruptcy, if an individual;
 4. the presentation of a petition for the appointment of an administrator or a receiver or manager in respect of the Applicant's undertakings;



5. cessation of discharge of trade effluent from the Premises.

Signed

D. F. C. Wiltshire
Senior Consultant - Wastewater Quality
Duly authorised to sign on behalf of the company

Dated this

1st day of October 2008

Statement of Acceptance

I acknowledge the receipt of this document.

Signed By..........

Name(please print)..........

Date..........

Position Held..........



NOTES:

- (a) All communications should be sent to the following address

Senior Consultant - Trade Effluent
Thames Water Utilities Ltd
Crossness Sewage Treatment Works
Belvedere Road
Abbey Wood
London
SE2 9AQ

- (b) Your attention is drawn to the right of appeal to the Director General of Water Services conferred by Section 122 of the Water Industry Act 1991 if you are aggrieved by any condition attached to this Consent.

- (c) A standing charge for all sewerage services plus a domestic sewerage charge is payable in addition to charges for trade effluent flows.

- (d) A copy of Thames Water Utilities Ltd Charges Scheme is obtainable from the Thames Water Customer Centre.

- (e) If you discharge trade effluent in contravention of a condition of this Consent you will be guilty of a criminal offence and may be subject to prosecution.



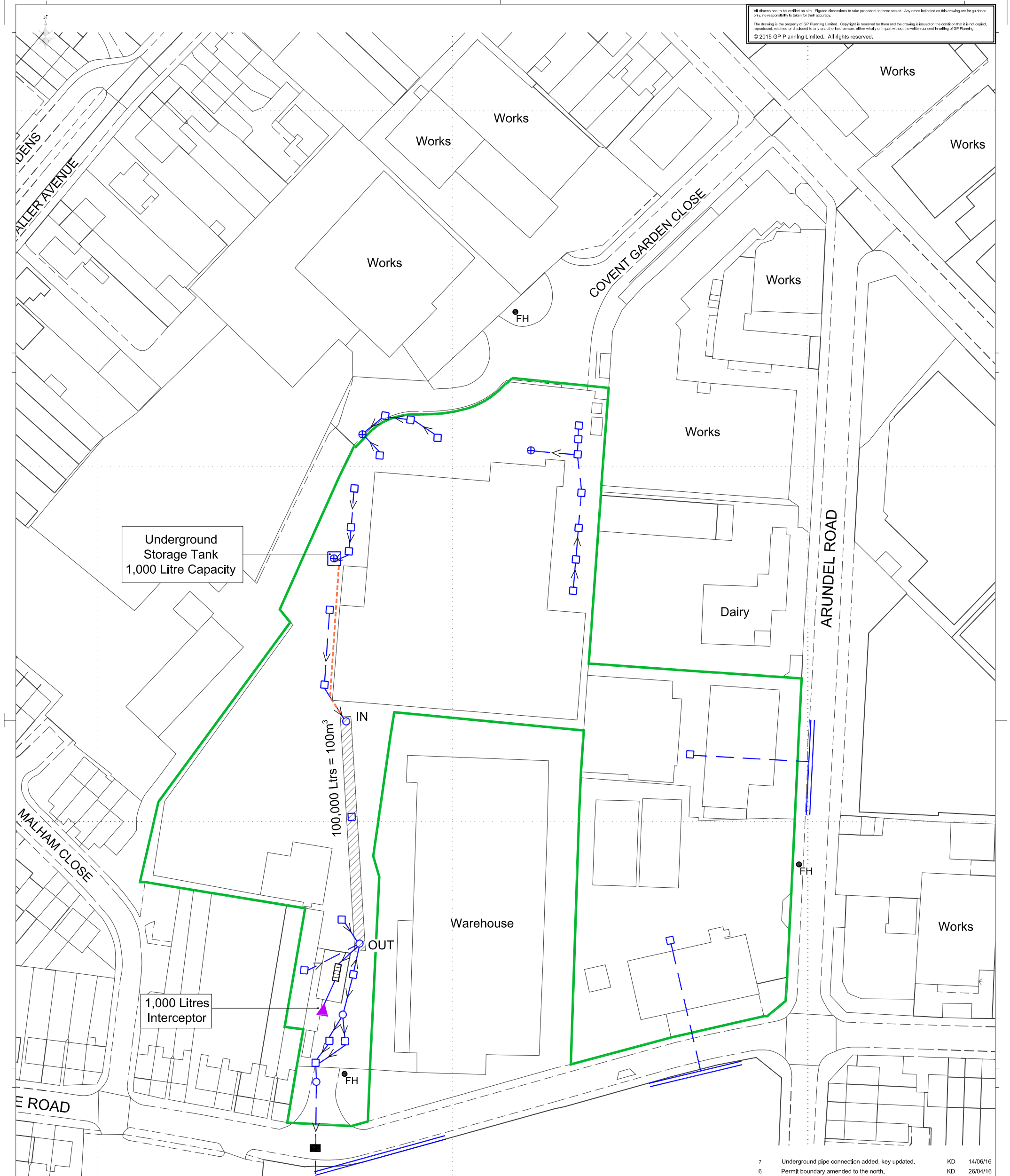
APPENDIX 1

The trade effluent shall not contain any of the substances listed below at a concentration expressed in milligrams per litre greater than that stated:

Settleable Solids	1000
Chemical Oxygen Demand	1000
Saponifiable Oil or Grease	300
Unsaponifiable Oil or Grease	50
Sulphide	1
Ammoniacal Nitrogen	35
Rapidly Settleable Solids	100
Phosphate (as P)	3

THERE ARE NO FURTHER LIMITS IN THIS APPENDIX

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7	Underground pipe connection added, key updated.	KD	14/06/16
6	Permit boundary amended to the north.	KD	26/04/16
5	Additional text to key.	KD	20/04/16
4	Additional drain, surface water & surface water sewer added to Arundel Road. 3 x Fire Hydrants added.	KD	23/03/16
3	Slight amendments and additional text added.	KD	17/03/16
2	Slight amendment to direction of flow, following a discussion with Alan Colledge.	KD	11/06/15

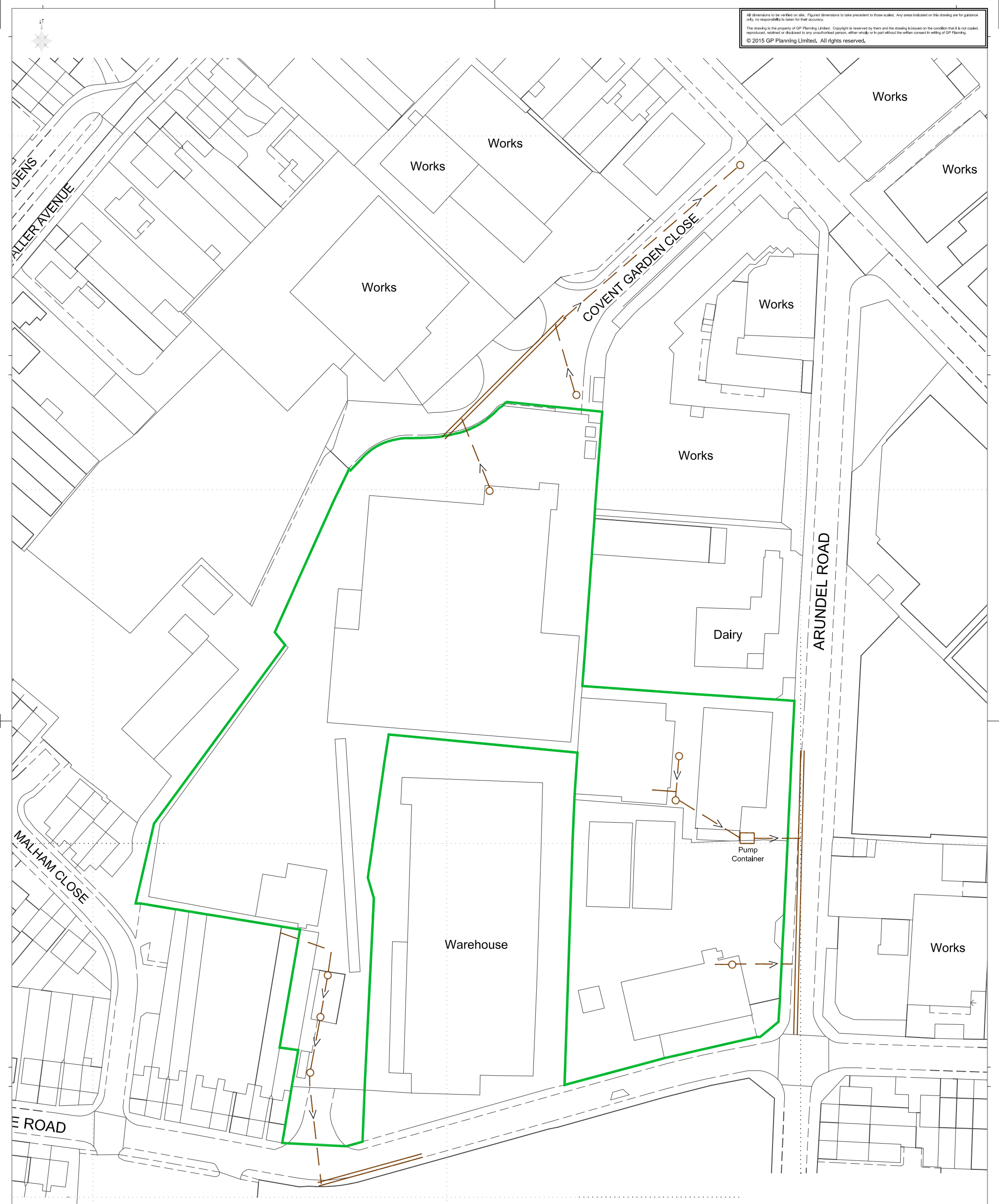
Rev	Description	Initial	Date
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KEY

	Manhole		Fire Water Containment & Silt Interceptor		Underground Pipe Connection
	Soakaway		Grit Chamber		Direction of Flow
	Drain Cover		Surface Water		Storm Outlet
	Interceptor		Surface Water Sewer		FH Fire Hydrants
			OUT Shut Off Valve		

		Environmental Consultants	
T: 01604 771123 F: 01604 771086 E: Info@gppanning.co.uk The Stables, Long Lane, East Haddon, Northamptonshire, NN6 8DU Registered in England No. 6019666			
TITLE:	Luton Waste Facility, Covent Garden Close, Luton Surface Water Drainage Plan		
CLIENT:	Cawleys		
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SCALE:	1:1000 at A3	DATE:	09 June 2015
SCALE BAR:			

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KEY	
	Manhole
	Foul Sewer
	Foul Water
	Direction of Flow

2 Permit boundary amended to the north. KD 26/04/16

Rev	Description	Initial	Date

		Environmental Consultants T: 01604 771123 F: 01604 771086 E: info@gppplanning.co.uk The Stables, Long Lane, East Haddon, Northamptonshire, NN6 8DU Registered in England No. 6019666	
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SCALE BAR:		ORIGINAL A3 SIZE SHEET	

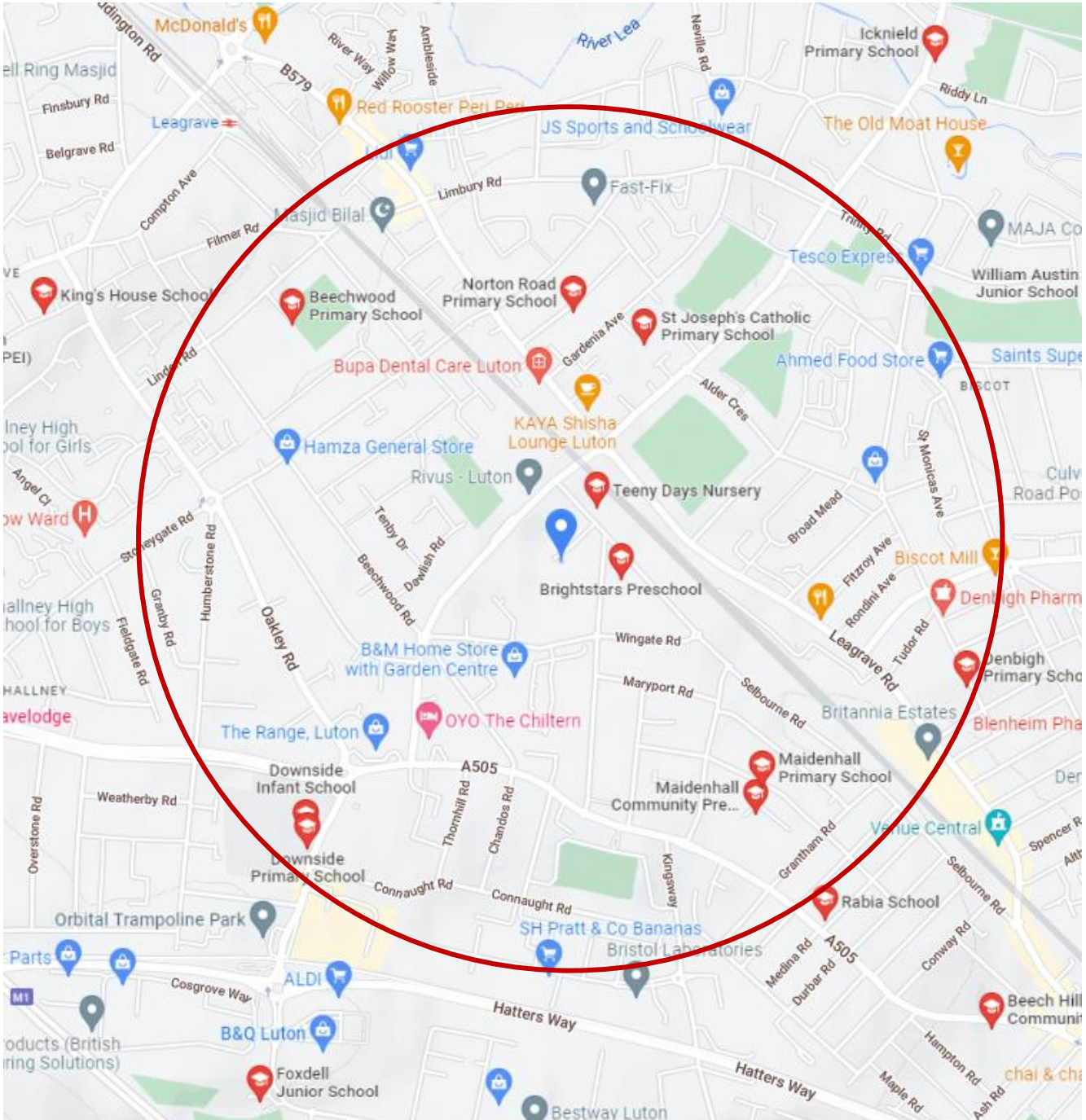
ENVIRONMENTAL MANAGEMENT PLAN

(FRC-EMP – Recycling Operations)



APPENDIX 10 – SENSITIVE RECEPTORS LUTON

Schools



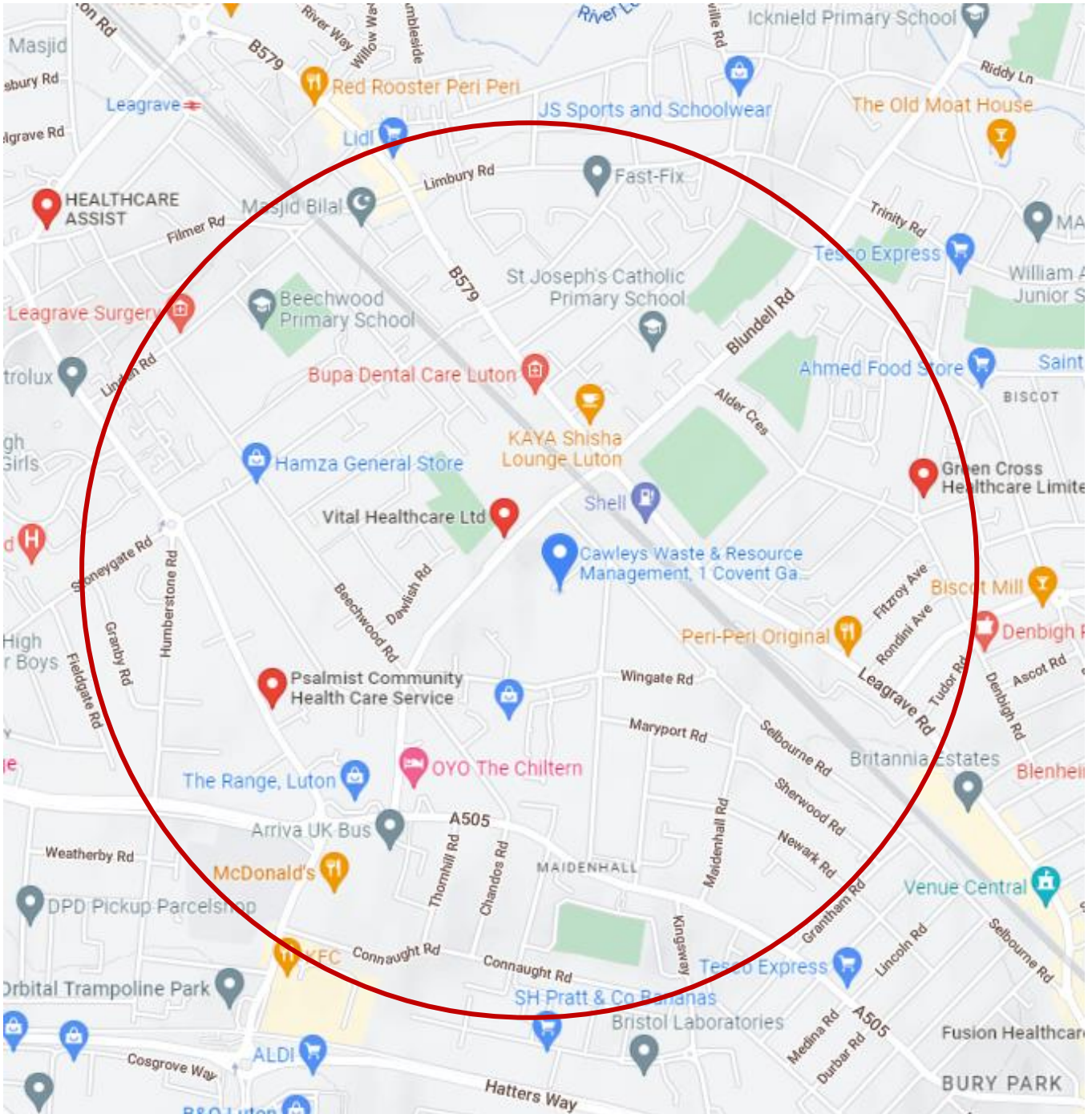
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ENVIRONMENTAL MANAGEMENT PLAN

(FRC-EMP – Recycling Operations)



Healthcare



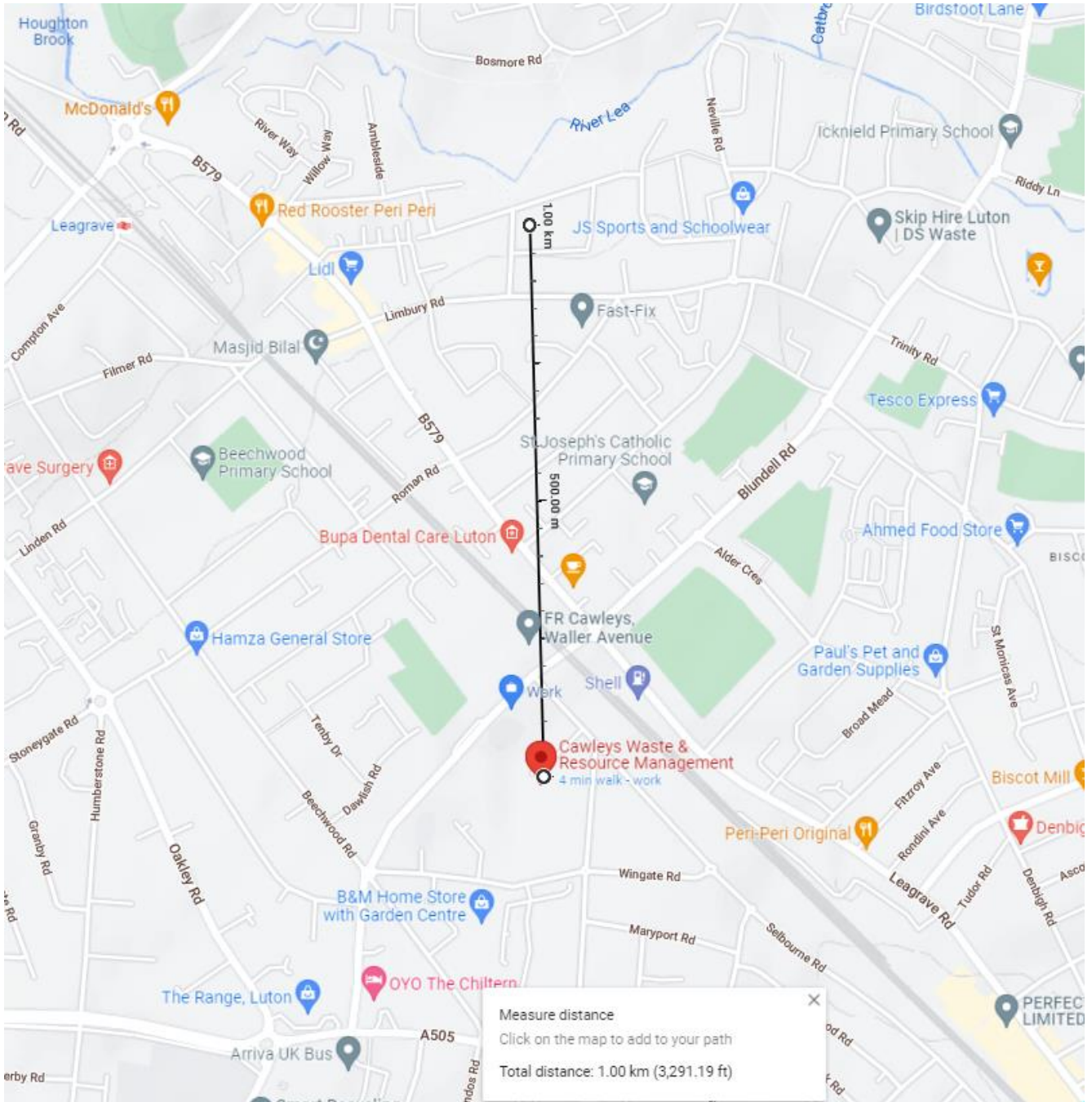
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ENVIRONMENTAL MANAGEMENT PLAN

(FRC-EMP – Recycling Operations)



Watercourses



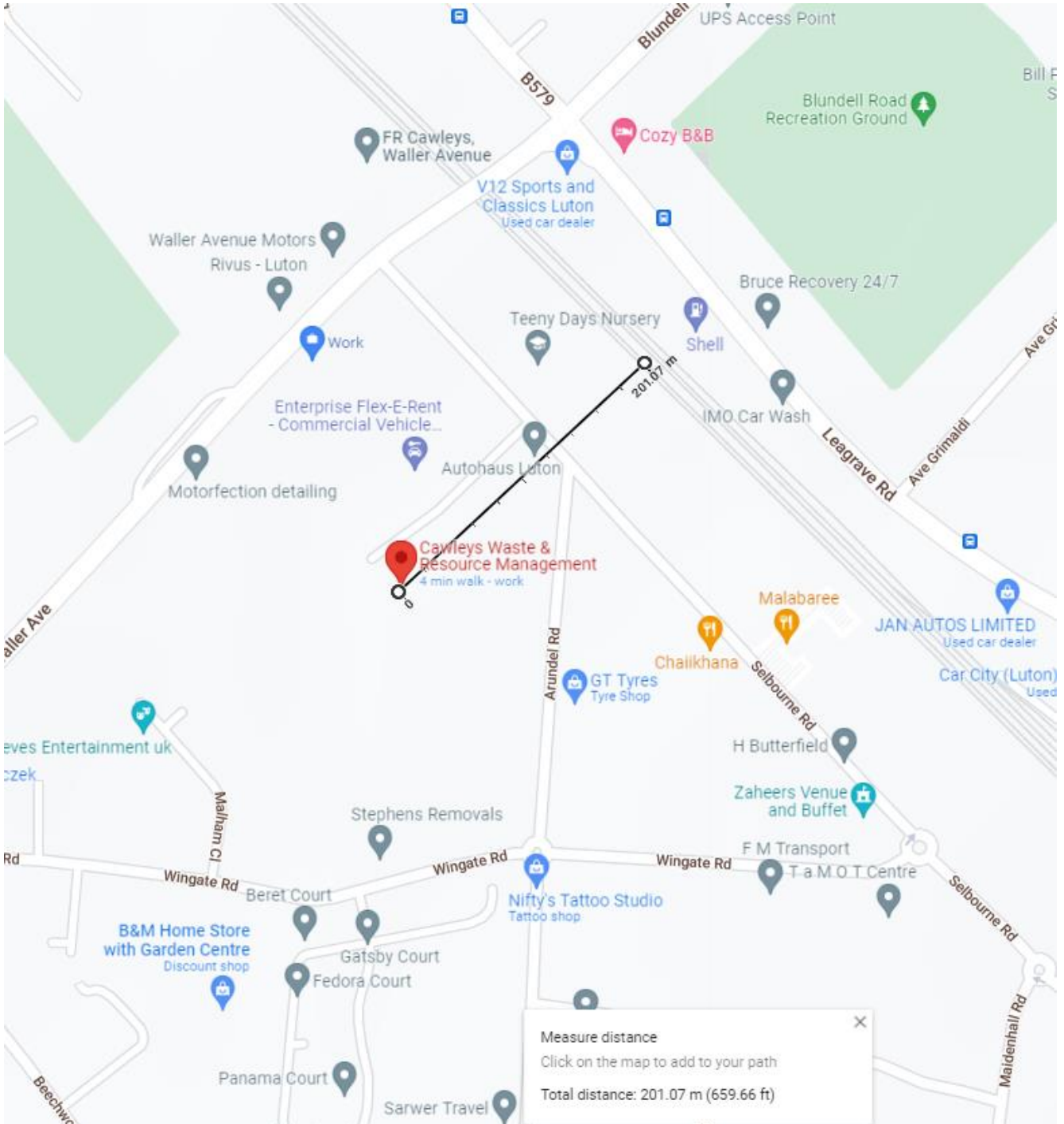
Google Maps September 2022

ENVIRONMENTAL MANAGEMENT PLAN

(FRC-EMP – Recycling Operations)



Railway



Google Maps September 2022

ENVIRONMENTAL MANAGEMENT PLAN

(FRC-EMP – Recycling Operations)



Residential properties

