

Document 2: Summary of Management System

Plans:

- 1) Accident Management Plan
- 2) Programme of Planned Preventative Maintenance
- 3) Complaints System/Plan
- 4) Site Security Plan:
- 5) Contingency Plan
- 6) Working Plan

Records:

- 1) Maintenance Records (for containment infrastructure) to demonstrate protection of land
- 2) Personnel competency records
- 3) Records of any off-site environmental effects (including pollution incidents that may have caused harm or human health effects)
- 4) Duty of care records (waste transfer notes/consignment notes)
- 5) Site record and return requirements (hazardous waste) (quarterly returns and records of hazardous waste received and transferred from facility)

1) Accident Management Plan:

Pollution Event/Threat to the Environment:

In the event of any accident/incident that could pose a threat to the environment, the Regulator will be contacted. For accidents that result in a pollution incident, the emergency pollution incident line will be used: _____. For less serious incidents that do not result in pollution, the Regulator will be contacted on _____ or via email: _____. In the case of spills/loss of containment, the spill kit (and any other reasonable measures) will be used to prevent migration of the pollution.

A note of the incident will be made in the site diary.

Harm/Threat to Human Health:

In the event of any accident/incident that could pose a threat to human health/safety, the activity giving rise to the threat will be stopped immediately and the area isolated. If any injury/harm is sustained that may require hospital attention, the emergency services will be called on **999** and details of the location, victim and suspected injuries will be provided. The designated first aid officer and/or other employees will provide care to the victim prior to the arrival of the ambulance. The incident will be noted in the site diary and the accident management plan will be updated as necessary.

In situations where any harm/injury is minor (and hospital care is not deemed necessary), the casualty will be treated as required using the on-site first aid equipment and an assessment will be made as to whether he/she is fit to remain at work or whether it would be prudent to return home until deemed fit to return to work. The incident will be noted in the site diary and the accident management will be updated as necessary.

The Regulator will be contacted without delay and, following any major incidents involving serious injury/death the Health and Safety Executive will be informed without delay on **0845 300 99 23**.

Evacuation Procedures: Where the threat to human health & safety is severe, evacuation of the premises should be put in hand without delay. All those on site must leave the building and/or site and congregate in the designated rendezvous point _____ where a roll call of those known to be present on site will be taken.

In all cases, the designated waste management operations will be stopped during times of any elevated risk to the environment or human health & safety and will not be recommenced until that elevated risk has ceased.

Managing the Risks:

Hazard /Accident	Probability of Occurrence	Risk Management	Consequence
<i>What has the potential to cause harm?</i>	<i>How likely is this occurrence?</i>	<i>What measures will be taken to reduce the risk if it occurs?</i>	<i>What harm could be caused?</i>
Transferring substances (Non-Clinical Waste): (Movement of incoming waste to storage containers and transfer of containers into skips/bulk containers resulting in spillage of contents and migration of pollution)	Medium risk of spillage	1) Use of spill kits to immediately clear up any spills 2)Routine visual inspections of impermeable floor to ensure its continued integrity	Minor pollution of soil/groundwater
Transferring substances: (Clinical Waste) Spillage of clinical wastes during transfer to storage containers and transfer of containers into skips/bulk containers resulting in risk to health & safety of those on site	Low-medium risk of spillage	1) Use of UN-approved bags and receptacles for packaging, minimising chances of loss of integrity 2) Use of PPE (specifically gloves)	Potentially serious harm to human health
Overfilling of Vessels:	Low	1) Staff training to ensure that waste receptacles/skips are not overfilled 2)Use of spill kits to immediately clear up any spills 3)Routine visual inspections of impermeable floor to ensure its integrity	Minor pollution of soil/groundwater
Plant or Equipment Failure: Failure of containment due to damaged containers	Low	1) Routine visual checking of containers to ensure their integrity 2)Use of spill kits to immediately clear up any spills 3)Routine visual inspections of impermeable floor to ensure its integrity	Minor pollution of soil/groundwater
Containment Failure: (Failure of Bund) Spillage of liquid wastes (e.g. photographic fixer/developer solution)	Low-medium	1) Routine visual checking of bund to ensure its continued integrity 2) Use of spill kits to clear up any spills 3) Routine visual inspections of impermeable floor to ensure its integrity	Minor pollution of soil/groundwater

Fires and Failure to Contain Firewaters:	Low	<ul style="list-style-type: none"> 1) Supply and maintenance of fire-fighting equipment 2) Training of staff in the use of such appliances 3) Maintenance of site drainage system which accesses foul sewer 	Respiratory irritation, illness and nuisance to local population. Injury to staff or fire-fighters. Pollution to water and land.
Vandalism:	Medium	<ul style="list-style-type: none"> 1) Maintenance of secure site boundary fencing 2) Secure locking of access gates during non-operational hours 	Potential Health & Safety aspect (depending on nature of vandalism)
Flooding:	Low	<ul style="list-style-type: none"> 1) All liquid wastes to be provided with secondary containment (bund) 2) Potentially infectious clinical sharps waste in secure sharps boxes, and secondary containment 	<ul style="list-style-type: none"> 1) Potential to contaminate buildings/gardens/natural habitats downstream, 2) Potentially infectious wastes contained within flood water
Odour nuisance:	Medium	<ul style="list-style-type: none"> 1) Regular movement of potentially odorous wastes 2) Sealing of skips 3) Good housekeeping 	Odour nuisance beyond site boundary for local residents
Noise nuisance:	Medium	<p>Following any complaints, action will be taken to identify the source of the noise and to prevent further occurrences. If further complaints are received noise monitoring will be carried out at the relevant site boundary and efforts will be made to identify the source to enable remedial actions to be taken. Such events shall be noted in the site diary</p>	Loss of amenity, loss of sleep
Mud/debris: Transmission onto the public highway	Low	Immediate cleaning of any mud/debris accumulating on the site	Potentially less control for vehicle users; visual impact

Dust: Elevated arisings	Low-medium	1) The use of the on-site water supply to provide a water misting system; 2)Regular housekeeping	Local air pollution, risks to operatives' visitors' (respiratory) health, fire risk
Pest infestations:	Medium	1) Secure (sealed) storage of wastes 2) Implementation of pest control contract where necessary	Threats to human health (particularly for site operatives), nuisance to those on site/local residents, loss of amenity
Non-conforming material: (Hazards from non-conforming materials in inappropriate containers (e.g. needles deposited in hygiene waste receptacles)	Low risk	Use of PPE (specifically gloves)	Potentially serious harm to human health
Ignition of (highly flammable) used aerosol cans	Low risk	1)Segregated storage of used aerosol cans away from sources of heat 2) Swift piercing of cans to remove hazard/swift transfer off-site	Potentially serious harm to operatives/those on site

Improvement Programme:

To ensure that a consistent, written approach to procedures and accident management is achieved across all of the Operator's facilities, the complete generic waste management folder will be issued to all service centre managers within 6 months of the variation of this permit.

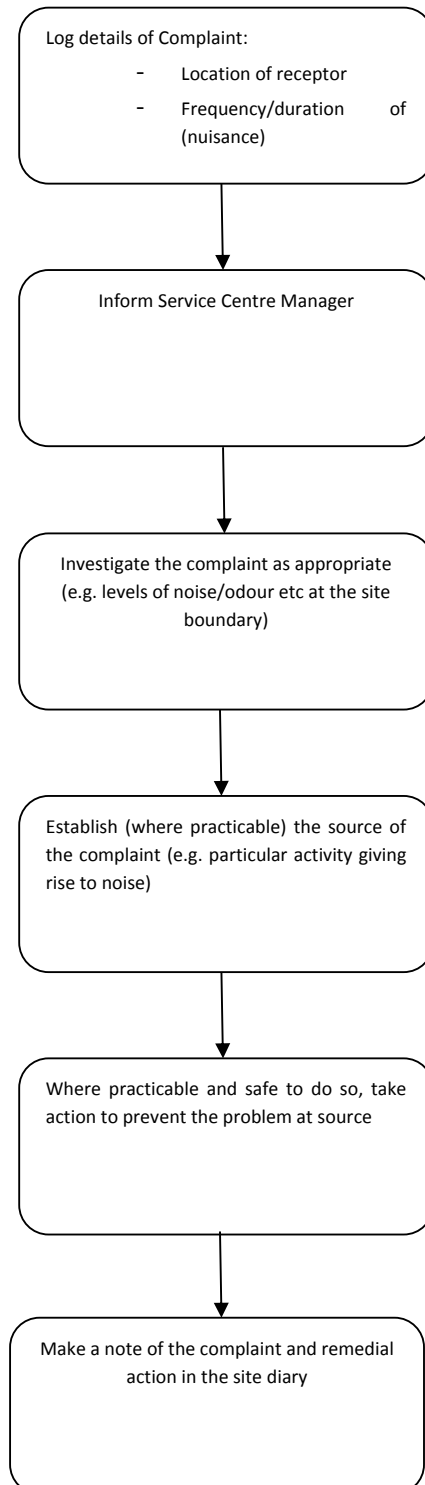
2) Programme of Planned Preventative Maintenance

The potential for any negative environmental impact from the site is greatly reduced where plant infrastructure such as hard-standing and bunds is fit-for-purpose. To ensure that this remains the case, the following procedures will be carried out:

- The ground area and structures throughout the site are subject to continuous inspection by the Site Manager and site staff during normal working hours
- A weekly report of the inspection results shall be recorded in the site diary
- Each storage container shall be inspected daily for leaks and other defects by the Site Manager and his/her staff during normal hours. Any faulty containers shall be withdrawn from use immediately
- Visual checks will be made when empty storage containers are delivered to site to assess the integrity of the container. Faulty containers will be rejected immediately and replacement containers requested
- Additional inspections shall be completed during routine cleaning and maintenance
- If remedial action is required, appropriate works or action will be undertaken within 72 hours of identification. Actions will be recorded in the site diary

3) Complaints System/Plan

In the event of a complaint being received; the following system/procedure will be implemented:



4) Site Security Plan:

Site security extends to both:

- The security of the site, its infrastructure and site staff during working hours
- The security of the site and its infrastructure during out-of-hours periods

This is achieved through the following measures:

- Keeping the premises securely locked except during opening hours
- Requiring all site visitors to sign in and out and not permitting access to unauthorised persons

Landlord Estate Security: Contact:

Service Charge Security

Details of what is supplied by the landlord in terms of general estate security is included in Appendix 4 of the Property Site Management Toolkit.

Manned/Unmanned IWS Security [Contact / Company / Contact]

The site and its boundary fencing must be kept in a good condition at all times to prevent arson, break-in and any environmental spillages/discharges.

The Site Manager or his/her staff shall inspect the security measures on a weekly basis. Additional inspections shall be carried out after any incident that may compromise the security of the site e.g. a break in. Any damage compromising the security of the site will be repaired immediately. Any damage not comprising the security of the site shall be repaired within 72 hours. A record of all inspections, damage and repairs shall be recorded in the site diary.

5) Contingency Plan

In the event of the facility being unable to accept waste for any length of time (for example as a result of maintenance), waste will be (temporarily) diverted to an alternative Initial Washroom Solutions/Initial Medical Services service centre that is licensed to accept the same waste types, in line with the Duty of Care Requirements.

Records:

1) Records to demonstrate protection of land (e.g. use and maintenance of impermeable surfacing and enclosed drainage systems). It can be very important to record details of any existing contamination (before the permit was issued) and to state how incidents/spillages have been cleaned up as they occur:

Infrastructure	Checked by:	Date	All in order?	Action taken (where necessary) (i.e. site manager informed/vessel or area isolated)
Floor surface				
Exterior surfacing				
Storage Vessels				

Records to illustrate the continued integrity of the containment infrastructure (to prevent any fugitive loss of substances/material)

Spillage Type/Description	Date	Action Taken (i.e. how the spillage was cleaned up)	Remediated (cleaned up) by:

Records of the remediation of any loss spills or loss of containment

2) Personnel competency records

Job Title	Skills Required	Evidence of Necessary Skills/Competence	Position filled by	Date of attainment of necessary skills	Refresher Training
Site Manager	To provide the technically competent management of the facility and to ensure compliance with WML conditions. Compiling and submitting of quarterly waste return to EA/SEPA/NIEA	Attainment of Certificate of Technical Competence (Level 4 Transfer of Hazardous Waste (Clinical) (4TSHC)	_____	_____	_____
Site Operative	To carry out waste transfer operations, specifically: _____	_____ _____	_____	_____	_____
Site Operative	To carry out waste transfer operations, specifically: _____	_____ _____	_____	_____	_____

3) Records of any off-site environmental effects (including pollution incidents) that may have caused harm or human health effects

Nature of Incident (causing off-site environmental effects)	Harm caused/alleged to have been caused	Action taken	Date

4) Duty of care records (waste transfer notes/consignment notes)

Waste transfer notes and are stored _____. They are kept for a minimum period of 2 years from the date of receipt of waste.

5) Site record and return requirements (hazardous waste) (quarterly returns and records of hazardous waste received and transferred from facility)

Hazardous waste consignment notes are stored _____. They will be kept until permit surrender.

6) Working Plan: Draft (and to be finalised)

1. General Conditions

1.1 Specified Waste Management Operations

The following activity is authorised to be carried out on site:

- The keeping (for transfer) of wastes associated with healthcare; municipal hygiene and pest control.
- The associated acceptance, bulking up and dispatch operations for these wastes

1.2 Permitted Wastes

The site activities include five Rentokil Initial business divisions; Medical occupy as a waste transfer station, with Ambius, Specialist Hygiene, Peter Cox and Pest Control utilising storage space within the confines of the permit. The following waste types will be permitted under the environmental permit.

Initial Medical Services (IMS):

The IMS waste streams primarily include sharps waste, anatomical waste, (orange bag) infectious waste, (yellow bag) clinical waste, offensive/hygiene waste, waste medicines, dental waste (including mercury-containing amalgam waste) and developer and fixer solutions.

The waste is brought to the licensed waste transfer station for bulking up, prior to its transfer to suitably licensed disposal and recovery facilities. Dental waste is sent to Medentex in Germany for recycling. Trans Frontier Shipment (TFS) documentation is completed for all shipments. The European Waste Codes for the IMS activities are as follows:

18	Wastes from Human or Animal Healthcare 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 01	Sharps (except 18 01 03*)
18 01 02	Body parts and organs including blood bags and blood preserves (except 18 01 03*)
18 01 03*	Waste whose collection and disposal is subject to special requirements in order to prevent infection
18 01 04	Waste whose collection and disposal is not subject to special requirements in order to prevent infection (for example dressings, plaster casts, linen, disposable clothing, diapers (nappies))
18 01 06*	Chemicals consisting of or containing dangerous substances
18 01 07	Chemicals other than those mentioned in 18 01 06*
18 01 08*	Cytotoxic and cytostatic medicines (including the sharps used to administer them)
18 01 09	Medicines other than those mentioned in 18 01 08*
18 01 10*	Amalgam waste from dental care
18 02	wastes from research, diagnosis, treatment or prevention of disease involving animals
18 02 01	(Veterinary) sharps waste that is not hazardous (does not contain infectious material or cytotoxic/cytostatic medicines)
18 02 02*	(Veterinary) hazardous clinical wastes (containing potentially infectious materials)
18 02 03	Offensive waste that is not hazardous
18 02 05*	Chemicals consisting of or containing dangerous substances
18 02 06	Chemicals other than those mentioned in 18 02 05*
18 02 07*	Cytotoxic and cytostatic medicines including the sharps used to administer them
18 02 08	Medicines other than those mentioned in 18 02 07*

09	Wastes from the Photographic Industry
09 01	Wastes from the Photographic Industry
09 01 01*	Water-based developer and activator solutions
09 01 02*	Water-based off set plate developer solutions
09 01 03*	Solvent-based developer solutions
09 01 04*	Fixer solutions
09 01 05*	Bleach solutions and bleach fixer solutions
09 01 07	Photographic film or paper containing silver or silver compounds
09 01 08	Photographic film or paper free of silver or silver compounds
09 01 99	Wastes not otherwise specified (inc. x-ray foil or lead capsules)
15	Waste Packaging; Absorbents, Wiping Cloths, Filter Materials and Protective Clothing not otherwise specified
15 01	packaging (including separately collected municipal packaging waste)
15 01 01	paper and cardboard packaging
15 01 03	Wooden packaging (coffins)
15 01 05	Composite packaging
15 01 06	Mixed packaging (e.g. wooden coffins with zinc lining)
15 01 10*	Packages containing residues of or contaminated by dangerous substances

Other wastes included in the permit;

Ambius waste is stored in its own dedicated skips

20	garden and park wastes (including cemetery waste)
20 02 01	Biodegradeable waste
20 02 02	Soil and stones

Peter Cox waste is stored in its own dedicated skips

17	Construction waste
17 09 04	Mixed construction waste

Rentokil Specialist Hygiene

RSH Specific waste acceptance training procedures have been established.

20 03	other municipal wastes
20 03 01	mixed municipal waste
20 03 06	waste from sewage cleaning
20 03 07	bulky waste (mattresses)

Pesticides from Pest Control services.

20	Municipal Wastes (Household waste and similar commercial, industrial and institutional wastes) Including separately collected fractions
20 01	Separately collected fractions (except 15 01)
20 01 19*	Pesticides

20 01 21*	Fluorescent tubes and other mercury containing wastes
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15 02	Absorbents, filter materials, wiping cloths and protective clothing
15 02 03	Uncontaminated PPE (cloths, gloves, overalls etc)
16	Wastes not otherwise specified in the list
16 02	Waste from electrical and electronic equipment
16 02 14	WEEE associated with pest control activities
16 06	Batteries and accumulators
16 06 04	alkaline batteries (except 16 06 03)

1.3 Hours of Operation

Waste will be accepted at the facility within the following hours:

Monday-Friday: 0600hrs to 1900hrs

Saturday & Public Holidays: 0600hrs to 1300hrs

No waste is currently accepted outside of these hours, although operations on site may extend to 24 hours a day, 7 days a week.

1.4 Capacity of Operation

The maximum waste accepted at the site will be 10 tonnes per day. The maximum waste stored on site at any time shall not exceed 10 tonnes. The maximum quantity accepted at the site shall be less than 5,000 tonnes per annum

1.5 Staffing and Technical Competence

The facility will be managed by a technically competent manager and operations will be overseen by an Environment, Health & Safety Manager.

COTC Holder: **John Penlington**

Date of COTC Award: 20/11/2013

Environment, Health & Safety Manager: **John Penlington CMIOSH**

COTC from sister site as and when required.

The operations will normally be overseen by a minimum of one competent person during operating hours.

1.6 Amendment Procedure

The Operator shall give written notice to the Environment Agency (EA) of any changes to the operations and/or the working plan. Any proposed changes shall not be implemented until written approval has been provided by the EA,

1.7 Management Plans

The facility is managed in accordance with Medicals Integrated Management System,

Compliant To:

ISO 9001:2008, ISO 14001:2004 & OHSAS 18001:2007

2. Site Engineering for Pollution Prevention and Control

2.1 Site Surface and Drainage Systems

Potentially contaminated surface water is discharged to the foul sewer, with signed discharge consent from Thames Water

2.2 Spill Containment Measures

2.2.1 In order to ensure that no pollution is created from fugitive emissions such as spills of waste material, the following operating procedures are followed:

- All wastes are stored in secure, sealed containers within the depot (which has an impermeable floor/ground surface) or within secure, sealed skips/containers sited on an impermeable surface with sealed drainage to the foul sewer. Any external sealed skips/containers shall be kept locked when not being loaded or unloaded
- Wastes which arrive in bags or other non-rigid containers are transferred into rigid containers immediately
- Rigid containers for the storage of waste are of a design that prevents the escape of any liquid and has a lockable lid or other means of securing the container
- Waste containing or contaminated with cytotoxic and cytostatic medicines are kept separate from other wastes
- Peter Cox waste (construction and demolition waste, under EWC 170904) is stored in an 8 yard container. The majority of waste is bagged, and there is a jet wash available, should dampening down be required

2.2.2 Liquids on site (comprising of fixer/developer solution and non-waste chemicals) will be stored with secondary containment (currently drop front wheelie bins).

2.2.3 Any spills of liquids or materials will be cleaned up without delay using a combination of the following:

- Spare containers
- Absorbent granules
- Dustpan and brush

- Appropriate personal protective equipment (PPE)

The spilled material will be deposited in an appropriate container and the area shall be thoroughly cleaned and disinfected. Spillage Procedures form part of Technicians/Operatives training.

- 2.2.4 A note of any spillage and the remedial action shall be recorded in the site diary.
- 2.2.5 If notified by the Agency that the activities are giving rise to pollution, a fugitive emission management plan will be drawn up and implemented in accordance with Agency guidance. This will form part of the wider management system.
- 2.2.6 Relevant staff on site receive spillage kit training.

Spillage Procedures form part of Technicians/Operatives training.

2.3 Maintenance Schedules

The ground area and structures throughout the site are subject to daily inspection by the site manager and site staff during normal working hours. A report of any loss of integrity shall be recorded in the site diary.

Each storage container shall be inspected daily for leaks and other defects by the site manager and his staff during normal working hours. Additional inspections shall be completed during routine cleaning and maintenance. Any faulty containers shall be withdrawn from use immediately.

All inspections, defects and repairs shall be recorded in the site diary.

3. Site Infrastructure

3.1 Site Identification Board

The site identification board will be situated at the entrance to the facility and will display the following information:

Operator's name and address: Initial Medical Services Ltd
28-30 Holloway Drive.
Worsley,
Manchester,
ML292LY

Telephone Number:

Opening Hours: Monday-Friday: 0600hrs to 1900hrs
Saturday and Public Holidays: 0600hrs to 1300hrs

Licensed by: Environment Agency

Emergency Telephone Numbers: 0800 807 060

Environmental Permit Number:

The board will be maintained in good order throughout the operational life of the facility.

3.2 Site Access

Access to the site is from the front, via the main front door (Reception). Vehicle access is via gates at the rear of the building.

3.3 Site Signs

Site signs detailing emergency exits, PPE requirements and Health & Safety information are displayed throughout the site.

All site signs will be maintained in good condition and will be updated as necessary.

3.4 Site Lighting

Fluorescent lighting is available throughout the facility. Where appropriate, additional (portable) lighting will be made available.

3.5 Site Accommodation and Facilities

The facility is well equipped with office space and personnel facilities, including meeting/training rooms. Toilets and hand washing facilities are located Ground Floor. The welfare facilities are connected to mains electricity and water.

Within the site accommodation, the following items shall be made available at all times:

- Current copy of the Environmental Permit (and conditions) and Working Plan
- Business Continuity Management Plan, covering emergency procedures.
- Working telephone
- First aid equipment
- Fire fighting equipment

Car parking is available to the front of the building. Welfare facilities are for the use of staff, contractors and visitors.

3.6 Site Security

Site access gates are only opened when the waste acceptance area is manned. Wheelie bins are kept locked, with only relevant staff holding keys. The facility will be locked shut at times outside of site operation.

Any damage compromising the security of the site shall be repaired immediately and any lesser damage shall be repaired within 72 hours.

A record of all damage and its remediation shall be recorded in the site diary.

4. Site Operations

4.1 Notices, Forms and Documents

4.1.1 External Notices

The site will display a notice board as described in section 3.1.

4.1.2 Internal Environmental, Health & Safety Notices

An EHS Notice Board is maintained within the site office with up to date versions of the following:

- Business Continuity Management Plan
- Fire risk assessment
- Integrated (Health, Safety, Environment and Quality) Policy
- Certificate of Employer Liability Insurance

4.1.3 Site Documents:

The Environment Folder (that contains the environmental permit, working plan and copies of relevant documents such as planning permission, waste carriers' licence and trade effluent consents) is to be held by the Branch or Service Manager.

The Service Manager or designated persons maintain a site diary into which all matters of significance are entered. This includes any potential or actual non-compliances or any events that threaten health and safety or the environment. All remedial actions will be recorded in the site diary.

All visitors to the site are required to enter their name, the date of visit, their organisation, car registration, reason for visit, and their signature into the Visitors' Book. The Visitors' Book shall be kept in the reception area in Unit 9 (Rentokil Initial occupy Units 8 to 10)..

Records shall be kept for a minimum of 6 years.

4.2 Site Safety

The Branch Manager and the wider management team shall ensure that all employees are aware of the location and content of the Integrated Policy and the Environmental Folder. All members of staff will then be responsible for ensuring that the policy is fully implemented.

4.3 Security of Buildings and Property

4.3.1 Buildings

To ensure the security of buildings and property:

- Keys to company property will only be kept by authorised personnel
- Where practicable, one person will be tasked with locking up and setting alarms

The Industrial Estate has 24 hour manned security, and cctv. There is also cctv within the facility.

4.3.2 Visitors

Unauthorised people will not be permitted onto company property.

Visitors must call at Reception, identify themselves and state the nature of their business. Unless the caller is known (ie familiar with the site and operations), he/she shall not be allowed on the site unaccompanied.

4.4 Waste Acceptance and Control

4.4.1 Waste shall only be accepted if:

- (a) It is of a type and quantity listed in section 1.2
- (b) It conforms to the description in the documentation supplied by the producer and holder

Once all unloading has been carried out, the waste acceptance schedule shall be completed.

4.4.2 Unauthorised Waste

Unauthorised waste shall be removed from site in a manner that ensures correct disposal.

Following the reception of unauthorised waste, the following actions shall be put in place:

- Verification of non-conformity shall be obtained from the driver (by the site operative)
- Where safe and practicable to do so, the non-conforming waste shall be re-loaded and the driver advised that it must be taken to an adequately licensed facility
- On discovery of non-conforming waste, the Service Manager shall be informed immediately
- If it is apparent that the non-conforming material is dangerous, the area where it is deposited will be isolated and other vehicles will be directed away for off-loading in a safe area

The Service Manager's procedures (following receipt of non-conforming waste) will be as follows:

- Inform the waste producer by telephone
- Inform the Environment Agency by telephone as soon as possible, and immediately if the material is dangerous and;
- Record the incident and subsequent actions in the site diary

Any stored unauthorised waste shall be removed from site as soon as practicable and, in all cases, within 72 hours of its discovery.

4.5 Waste Spillage Procedure

The waste spillage procedures in sections 2.2.3 and 2.2.6 shall be followed.

4.6 Operational procedures Following Waste Acceptance

The following operating procedures are in place for the respective waste types:

Waste Type	Waste Operating Procedure
Offensive/Hygiene Waste EWC 18 01 04	The offensive/hygiene waste stream (18 01 04) arrives at the site within fit-for-purpose tiger bags, which are emptied into the larger skips prior to their transfer to a suitably licensed disposal facility.
Other than EWC 18 01 04 except liquid waste	All other IMS waste is stored within 1100-litre wheeled bins within the internal area of the permit. The medical sharps boxes and the hospital theatre units arrive at the site pre-sealed and remain sealed until final disposal. They are placed (unopened) directly into the wheeled bins. The dental waste units (of 0.65 to 25 litre capacity) containing amalgam (mercury-containing) wastes are sealed prior to their return to the facility.

	They are stored separately within the secure internal storage cage prior to their transfer to Medentex (recovery) facility. Anatomical waste is placed in a secure refrigeration unit.
Liquid wastes: EWCs 09 01 01*; 09 01 03*; 09 01 03*; 09 01 04*; 09 01 05*	The liquid wastes accepted at the facility are the fixer and developer photographic solutions (used within x-ray systems) under the chapter 9 EWCs. All of these solutions arrive at the site in suitable, secure UN containers, and are stored in a secure cage, inside drop front wheelie bins (secondary containment).
20 02 01 (biodegradable waste) 20 02 02 (soil and stones)	Ambius waste is stored inside their own containers, prior to removal, and transferred to a suitably licensed (recovery) facility on a monthly frequency
17 09 04 (mixed construction waste)	Peter Cox waste is stored inside their own skip, prior to removal, and transferred to a suitably licensed (recovery) facility on a monthly frequency
The below waste are not currently held on site, but are in the permit. Therefore, the following storage plans are in place, should the need arise.	
15 01 06 (predominantly clean outer packaging) 15 02 03 (predominantly clean PPE, cloths, gloves etc)	This waste is bagged separately and placed in a designated wheelie bin.
20 01 99 (rodent/bird bodies, other carcasses and other associated offensive waste);	This waste is bagged separately and placed in a designated wheelie bin.
16 02 14 (waste electrical & electronic equipment (WEEE), excluding batteries	This waste is bagged separately and placed in a designated wheelie bin.
20 01 19* (pesticides, baits and contaminated products) 15 01 10* (contaminated pest control packaging)	This waste is bagged separately and placed in a designated wheelie bin.
Aerosol cans EWC 16 05 04* and 16 05 05	On arrival at the facility, the used aerosol cans are placed in a 205 litre drum within the internal, permitted area, prior to their transfer to a suitably authorised reprocessing facility.
Fluorescent (UV) tubes EWC 20 01 21*	The fluorescent tubes are placed in fit-for-purpose, secure tube carriers and transferred to a suitably licensed (recovery) facility on a monthly frequency.
20 01 25 (edible oil and fat, including grease trap waste)	This waste will be stored on an impermeable surface, with secondary bunding

4.6.1 General office waste is stored in a suitable receptacle outside the building and disposed of by a licensed waste contractor as appropriate.

4.7 Waste Storage

4.7.1 Waste Storage Quantities and Durations

The maximum amount of waste throughput for the site shall be 3,999 tonnes per annum.

The maximum amount of waste to be stored on the site at any one time shall not exceed 10 tonnes per day.

Waste Type (EWC and description)	Maximum duration
20 01 99 (offensive waste)	2 weeks
16 05 04* / 16 05 05 (aerosol cans)	1 month
20 01 21* (fluorescent tubes)	1 month
18 01 01 (IMS non-hazardous sharps waste)	2 weeks
18 01 02 (IMS body parts and organs/blood bags)	2 weeks
18 01 03* (IMS hazardous sharps/clinical waste)	2 weeks
18 01 04 (IMS offensive/hygiene waste)	2 weeks
18 01 06* IMS (Chemicals consisting of dangerous substances)	2 weeks
18 01 07 (Chemicals not consisting of dangerous substances)	2 weeks
18 01 08* (cytotoxic and cytostatic medicines including sharps used to administer them)	2 weeks
18 01 09 (Medicines other than those mentioned in 18 01 08*)	2 weeks
18 01 10* (Amalgam waste from dental care)	1 month
09 01 01* (Photographic solution)	1 month
09 01 03* (Solvent-based developer)	1 month
09 01 04* (Photographic fixer)	1 month
09 01 05* (Bleach solutions and bleach fixer solutions)	1 month
09 01 07 (Photographic film or paper containing silver or silver compounds)	1 month
18 02 01 (Veterinary sharps waste that is not hazardous (does not contain infectious material or cytotoxic/cytostatic medicines)	2 weeks
18 02 02* (Veterinary) hazardous clinical wastes (containing potentially infectious material)	2 weeks
18 02 03 (Veterinary) offensive waste that is not hazardous	2 weeks
18 02 05* (Veterinary) chemicals consisting of or containing dangerous substances	2 weeks
18 02 06 (Veterinary) chemicals other than those mentioned in 18 02 05	2 weeks
18 02 07* (Veterinary) cytotoxic and cytostatic medicines including the sharps used to administer them	2 weeks

18 02 08 (Veterinary) medicines other than those mentioned in 18 02 07	2 weeks
15 01 03 Wooden packaging (coffins)	2 weeks
15 01 06 Mixed packaging (e.g. wooden coffins with zinc-lining)	2 weeks
20 01 21* Fluorescent tubes and other mercury-containing waste (e.g. sphygmomanometer)	1 month
20 01 31* Cytotoxic or cytostatic medicines including sharps used to administer them	2 weeks
20 01 32 Medicines other than those mentioned in 20 01 31*	2 weeks
20 01 99 Sanitary waste and nappy waste from commercial establishments	2 weeks
15 01 06 Clean recyclable outer packaging	2 weeks
15 02 03 Uncontaminated PPE (cloths, gloves, overalls etc)	2 weeks
16 02 14 WEEE	2 weeks
20 01 19* Pesticides (baits, old stock preps)	2 weeks
15 01 10* Contaminated pest control packaging	2 weeks
20 02 01 (biodegradable waste)	1 month
20 02 02 (soil and stones)	1 month
17 09 04 (mixed construction waste)	1 month

Unauthorised/non-conforming waste shall be stored for a maximum of 72 hours before being transferred to a suitably licensed facility.

4.8 Waste Collection and Dispatch Procedures

4.8.1 Incoming Waste:

All relevant staff will be trained in waste acceptance procedures.

Waste will be delivered to the site by Medical Technicians, or, when pre-agreed, designated Rentokil Initial service delivery drivers. These members of staff are fully trained in company policies.

4.8.2 Waste Dispatch Procedures:

Waste uplifted from the site shall be carried by approved contractors only. Copies of all licences including their waste carriers' licence will be required prior to a contract being formed. Contractors will be notified to the Environment Agency prior to use.

4.9 Personal Protective Equipment (PPE)

Site operatives shall wear PPE where appropriate. This may include a combination of the following:

- Eye/face protection visors, goggles or safety glasses
- Body protection overalls, needlestick injury proof aprons, hi-visibility vests,
- Hand protection needlestick resistant gloves, disposable gloves
- Feet safety footwear incorporating steel toecaps

All PPE issued is recorded on an employee's PPE Issue Record and it is the employees' duty to regularly check and report any damage or loss to their Line Manager.

4.10 Waste Quantity Measurement System

Waste dispatched from the site will be measured by weight (with quantities sent by waste contractors on a monthly basis). The company checks annual total waste returns to ensure maximum permitted weights are not exceeded. It is estimated that the addition of the Peter Cox (construction and demolition waste, under EWC 170904) will result in total waste for the site reaching 1,010 tonnes per annum (with this construction and demolition waste forming up to 360 tonnes of this – an average of 7 tonnes per week).

4.11 Control of Mud and Debris

Mud and debris are unlikely to be generated by the site operations. The site surface shall be regularly swept and cleaned to further reduce the likelihood of mud and debris reaching the highway.

In the unlikely event of mud being tracked from the site onto the public highway, immediate arrangements will be made for remediating the deposit and actions will be put in place to prevent a reoccurrence.

4.12 Fires on Site

No waste shall be burned on site. All appropriate fire-fighting equipment shall be maintained in good working order. Fire Marshals have been trained in the correct use of such appliances.

Any incidents of fire on site shall be reported to the Environment Agency without delay.

5. Pollution Control, Monitoring and Reporting

5.1 General

Visual monitoring will be carried out routinely and any relevant issues will be recorded in the site diary. Any signs of pollution will be acted upon, where possible, and recorded in the site diary.

The Service Centre Manager or the Processing Unit Manager shall inform the SHEQ Manager of any unacceptable signs of pollution. If remedial action is required, appropriate works or action will be undertaken by the Operator within 72 hours of discovery. Actions will be recorded in the site diary.

5.2 Surface Water Quality Monitoring and Reporting Systems

All surface water will be directed to the site drainage system and discharged to the foul sewer in accordance with the required trade effluent consent (Wessex Water letter of approval is kept in the environment folder).

6. Amenity Management

6.1 General

The site operations will be carried out without causing harm to human health or the environment.

6.2 Control, Monitoring and Reporting of Dusts

It is unlikely that site operations will lead to elevated levels of dust and airborne particles. In the unlikely event of such an occurrence, the on-site water supply shall be used to curtail levels of dust to ensure that a hazardous environment or nuisance does not develop. Peter Cox building waste is only ever delivered by Technicians in their company vehicles, so amounts will be minimal. Regular housekeeping around the site shall further help to reduce the likelihood of such an occurrence. This will include daily cleaning in and around the wash plant and skips, with the entire operational area of the site subject to disinfection on a weekly basis.

6.3 Control of Odours

6.3.1 Provided that the designated operating and storage procedures are followed, the licensed activities are unlikely to result in odour at levels likely to cause annoyance outside the site. The procedures in place to prevent emission of odour include:

- The checking of all outer containers (including wheeled bins) prior to use to ensure their integrity (so that any potential spillages will be contained)
- Regular housekeeping around the waste areas of the site
- Regular transfer of waste off-site in accordance with the conditions (so that no waste remains on site for a length of time conducive to odorous emissions or beyond the duration permitted by the environmental permit).

Should any incidents of odour arise, attempts will be made to trace the source of the odour and any containers deemed to be the source shall be kept sealed, and the material transferred for disposal without delay.

6.3.2 Following any perceived elevation in odour levels, site operations shall be reviewed to ensure that any reoccurrences are minimised.

6.3.3 Any incidents of odour nuisance and the associated remedial action shall be recorded in the site diary.

6.4 Control and Monitoring of Noise

6.4.1 The licensed activities are unlikely to cause annoyance beyond the site boundary, with the main sources of noise being those created by vehicular movements. Should any incidents of perceived noise/vibration annoyance arise beyond the site boundary, appropriate noise reduction measures shall be taken.

6.4.2 Any instances of noise/vibration-related complaints beyond the site boundary and the measures used to rectify these shall be recorded in the site diary.

6.4.3 If any complaints with respect to noise and vibration are received, a noise/vibration management plan will be produced and implemented. This will form part of the management system.

6.5 Control of Pests

Good housekeeping and proper containment of wastes should prevent any nuisance caused by pests and insects. As a further measure, a contract is in place with Rentokil Pest Control who will inspect the site and carry out necessary actions as and when required to keep the site free from pests and insects.

6.6 Control of Litter

A daily check of the site will be conducted and acted upon accordingly.

7. Site Records

7.1 Security and Availability of Records

7.1.1 In order to comply with the Duty of Care and permit conditions (and to ensure the efficient running of the facility), records are kept of the following:

- Consignment note/waste transfer note documentation
- Details of registered waste carriers
- Waste input
- Damage to site security
- Visitors' book
- Disposal contractors' licences
- Records of quarterly returns
- Waste inspections
- Details of any unauthorised waste
- Any other relevant events that could impact on compliance

7.1.2 A site diary is used to record notable events such as: incidents, complaints, inspections, maintenance, non-compliance and improvements. In particular, this includes details of:

- any construction work
- maintenance
- breakdowns
- emergencies
- non-conforming waste loads and actions taken
- site inspections including non-conformances and actions taken
- technically competent management attendance on site
- correspondence to/from the Environment Agency
- complaints received regarding the site and actions taken
- environmental problems and actions

7.1.3 All records shall be legible, made without delay and retained for at least 6 years (and in the case of records relating to hazardous waste, for the duration of the environmental permit). In the case of any records relating to off-site environmental effects and matters which affect the condition of land/groundwater, records will be retained until the surrender of the permit.

7.1.4 All records, plans and written management plans will be kept on site throughout the duration of the permit.