

# **SHAW HAULAGE LIMITED**

---

## **ENVIRONMENTAL MANAGEMENT SYSTEM**

---

### **OPERATING PROCEDURES Reference: EMS-OP-01**

---

**Version 2 Dated 14 August 2023**

---

**Queenborough Business Park  
Queenborough  
Isle of Sheppey  
ME11 5DY**

---



<b>SHAW HAULAGE LIMITED</b>	<h1>Operating Procedures</h1>	
<b>Document Reference: EMS-OP-01</b>	<b>Issue Number: 2</b>	<b>Issue Date: 14.8.2023</b>

## 1 INTRODUCTION

This document has been prepared in accordance with Environment Agency guidance Non-Hazardous and Inert Waste: Appropriate Measures for Permitted Facilities.<sup>1</sup> Specific paragraphs and chapter references have been used.

### 1.1 Roles and Responsibilities

The Director is responsible for the implementation of the Environmental Management System (EMS). The Director is responsible for employing staff qualified to carry out their specific roles. This is achieved with the Technically Competent Manager for the site.

The Technically Competent Manager (TCM) has responsibility for ensuring these procedures are adhered to which includes communication with staff and contractors, and the provision of adequate training.

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

### 1.2 Purpose

The purpose of these procedures is to guide staff and contractors in the safe conduct of their duties in a manner which controls the environmental impacts of the company's operations. The procedures cover normal operations on site, with contingency planning also provided.

The site can meet the Standard Rules Permit SR2009 No.6 Inert and Excavation Waste Transfer Station with Treatment (<250,000tpa), except for the proximity to European Sites and Sites of Special Scientific Interest (SSSI). It would meet all other criteria.

The site is 360m from the Medway Estuary & Marshes, which are a designated Ramsar site, SSSI and Special Protection Area (SPA). The distance set out in the Standard Rules permit is 500m.

With reference to the Environment Agency guidance, it states *"If you are applying for a bespoke permit but most of your activities are covered by standard rules, you only need to do a risk assessment for the activities or risks that are not covered by the generic risk assessment for those standard rules."*

All of the activities will meet the generic risk assessment for the standard rules. The only risk not covered by the generic risk assessment is the risk to the Medway Estuary & Marshes. A separate Risk Assessment has been prepared.

Kent County Council granted planning permission for the use of the site as a Materials Recycling Facility, including the erection of an operations centre and maintenance workshop building and parking for 26 HGVs. Planning permission was granted on 20 November 2020.

The site is currently used as a haulage depot for Shaw Haulage Limited.

<sup>1</sup> Published 12 July 2021 <https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities/2-general-management-appropriate-measures>

<b>SHAW HAULAGE LIMITED</b>	<b>Operating Procedures</b>	
<b>Document Reference: EMS-OP-01</b>	<b>Issue Number: 2</b>	<b>Issue Date: 14.8.2023</b>

### **1.3 The Operator**

Shaw Haulage has been operating since 2013. The company now has an Operating Licence for 20 HGVs. The Operating Centre is at the Queenborough Site.

Planning permission was granted by Kent County Council on 20 November 2020 for the use of the site as a Materials Recycling Facility including the erection of an operations centre and maintenance workshop building and parking for 26 HGVs.

Shaw Haulage operate a fleet of HGVs used in the collection and transportation of construction, demolition and excavation waste (CDE).

The applicant will import mainly demolition waste, i.e. concrete, bricks, hardcore, to the site for processing. The wastes will be crushed to produce recycled aggregates. The site may also store primary aggregates for direct supply to the construction industry.

The site is the operational base for the fleet of the HGVs and provides the Head Office for the company. The Transport Manager and Accounts team are based at the site.

### **1.4 Site Location**

The procedures relate to the permitted activities at Queenborough Business Park, Queenborough, Isle of Sheppey, ME11 5DY.

The permit boundary is shown on Drawing No. SHL-EP-01

### **1.5 Scope**

These Operational Procedures cover:

- Physical Treatment of non-hazardous waste

### **1.6 Management System**

The Management System covers all aspects of operations and aims to effectively manage the impacts of the business on the environment. The key documents include:

- a) Documents: Procedures to set out how to undertake operations and checking for any issues.
- b) Forms on which to record information and provide evidence of the system functioning properly.
- c) Environmental Policy

Cross referencing to specific aspects in the EMS has been made in this report.

All documents will be kept in the site office.

<b>SHAW HAULAGE LIMITED</b>	<b>Operating Procedures</b>	
<b>Document Reference: EMS-OP-01</b>	<b>Issue Number: 2</b>	<b>Issue Date: 14.8.2023</b>

### **1.7 Accident Management Plan**

An Accident Management Plan has been prepared and is provided with the Environmental Risk Assessment.

The Accident Management Plan complies with Paragraph 2.3 of the guidance.

<b>SHAW HAULAGE LIMITED</b>	<h1>Operating Procedures</h1>	
<b>Document Reference: EMS-OP-01</b>	<b>Issue Number: 2</b>	<b>Issue Date: 14.8.2023</b>

## 2 MANAGEMENT OF OPERATIONS

### 2.1 Site Infrastructure Plan

The site layout is shown on Drawing No. SHL-LAY-01. The plan shows the following:

- Site Gated Entrance
- Waste Reception Area
- Waste Treatment Area
- Aggregate Storage Bays
- Bay Walls
- Perimeter Wall
- Site Office and Car Park
- Weighbridge
- Vehicle Inspection and Wash Down Area
- Mains Water
- Spill Kits and Fuel Tank

### 2.2 Hours of Operation

The operational hours for the site are:

Monday to Friday    07.00-18.00  
Saturday                07.00-14.00  
No operations on Sunday or Bank Holidays

The crushing operations will take place during the following hours:

Monday to Friday    0900-15.00  
No operations on Saturday, Sunday or Bank Holidays

The site will be locked when not manned, with out of hours security provided.

<b>SHAW HAULAGE LIMITED</b>	<b>Operating Procedures</b>	
<b>Document Reference: EMS-OP-01</b>	<b>Issue Number: 2</b>	<b>Issue Date: 14.8.2023</b>

### 2.3 Staff

This company employ 34 staff as follows:

Director (EPOC)	1
Commercial Manager (WAMITAB)	1
Transport Manager	2
Accounts Manager	1
Accounts/Admin	2
Drivers	21
Machine operators	5
Mechanics	1

Most staff will be based at the Queenborough site. The site is currently used as the company Head Office and Transport Depot.

### 2.4 Mobile Plant and Equipment

The site will use the following mobile plant and equipment.

Rubble Master 90	x1
Loading Shovel	x1

The company has a policy of replacing old machinery with modern machinery.

Whilst the concrete crusher is a mobile plant, it will be operated in a fixed position as shown on the layout plan.

An anti-idling policy will be in place to ensure that engines are switched off when not in use.

All road and mobile plant will be complaint with Euro 6 emissions standard.

The site has a Planned Preventative Maintenance Schedule (PPMS) for each item of machinery and all road vehicles. A Transport Manager is responsible for this.

Prior to operations commencing, a PPMS will be created for the site based plant and machinery. This will detail the daily, weekly, monthly and annual checks required to prevent any maintenance issues. The operator has in-house mechanics trained to carry out the servicing requirements. The routine servicing is carried out by a third party.

### 2.5 Security

The site will be secured with a combination of 4m high concrete walls and steel palisade fencing. There will be one vehicular access point to the site and one access point to the car park. Pedestrian access to the site will be via lockable gates.

The main vehicular access gates will be locked when the site is not manned.

<b>SHAW HAULAGE LIMITED</b>	<h1>Operating Procedures</h1>		
<b>Document Reference: EMS-OP-01</b>		<b>Issue Number: 2</b>	<b>Issue Date: 14.8.2023</b>

There is a 2-storey site office adjacent to the vehicle access gate. This provides an elevated view for site staff to check incoming / out going vehicles.

CCTV will be provided at each access point.

A security guard is provided for non-operational hours.

All security infrastructure is checked daily. Any signs of unauthorised entry will be reported to the Police and Environment Agency. CCTV will be reviewed and if necessary, corrective action taken to prevent a recurrence.

## **2.6 Technical Competence and Training**

This section complies with Paragraph 2.2 of the guidance.

### **2.6.1 Site Operations**

The site operations will be overseen by a Technically Competent Manager (TCM). The TCM will be responsible for ensuring the requirements of continued competency is met. A copy of the Certificate will be kept in the site office.

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

Other site personnel will include administrative staff and site operatives.

All personnel will receive induction training which will describe the requirements of the Environmental Permit and these Operational Procedures. The responsibilities set out below relate to the implementation of this EMS only.

The Site Management can include the Director, TCM, Transport Manager and Accounts Manager. The Site Management team are available to deal with complaints or issues raised by site staff.

### **2.6.2 Site Management Responsibilities**

The Site Management will be responsible for:

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



<b>SHAW HAULAGE LIMITED</b>	<h1>Operating Procedures</h1>	
<b>Document Reference: EMS-OP-01</b>	<b>Issue Number: 2</b>	<b>Issue Date: 14.8.2023</b>

### 2.6.3 Site Operative Responsibilities

It is the responsibility of Site Operatives to:

- Act in accordance with the instruction given to them from the TCM or Site Management.
- Follow these operational procedures for all stages of waste handling.
- Report any incidents or non-conformances to the TCM or Site Management.
- Ensure site is clean and report any amenity issues to the TCM or Site Management
- Ensure correct PPE is worn. Report any issues to TCM or Site Management.
- Ensure process equipment (picking station) is clean and in good working order. Report any damage or malfunction to TCM or Site Management.

### 2.6.4 Mobile Plant Operative Responsibilities

It is the responsibility of Mobile Plant Operatives to:

- Act in accordance with the instruction given to them from the TCM or Site Management.
- Follow these operational procedures for all stages of waste handling.
- Report any incidents or non-conformances to the TCM or Site Management.
- Check fire extinguisher is in the cabin.
- Ensure mobile plant is checked before use each morning for signs of wear and tear which could compromise health and safety or environmental protection. Use Daily Vehicle Check Form EMS-FR-05 or defect form. All issues noted with equipment or the condition of the site must be reported to the Site Management immediately, before the equipment is used.
- Switch of plant when not being used and to park in the designated area at the end of each working shift.

### 2.6.5 Banksman Responsibilities

It is the responsibility of the banksman to:

- Act in accordance with the instruction given to them from the TCM or Site Management.
- Follow these operational procedures for all stages of waste handling.
- Report any incidents or non-conformances to the TCM or Site Management.
- Ensure the safe manoeuvring of vehicles within and around the site.
- Ensure vehicles leave the site clean and report any issues to the driver to ensure wheels are cleaned before exiting the site.
- Instruct plant operatives to clean working areas as and when required.
- Ensure the dust suppression system is work at the building entrance.

<b>SHAW HAULAGE LIMITED</b>	<b>Operating Procedures</b>		
<b>Document Reference: EMS-OP-01</b>	<b>Issue Number: 2</b>	<b>Issue Date: 14.8.2023</b>	

### 2.6.6 Training

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

A record of staff training will be kept for each staff member which includes inductions to new processes and procedures as needed. EMS-FR-03.

The following training matrix will be adopted to guide training needs.

<b>Training</b>	<b>TCM</b>	<b>Site Management</b>	<b>Site Operative</b>	<b>Plant Operative</b>	<b>Banksman</b>	<b>Accounts / Admin</b>
Induction	x	x	x	x	x	x
Accidents and Emergency	x	x	x	x	x	x
Fire Prevention	x	x	x	x	x	x
Amenity Management	x	x	x	x	x	x
Plant Training	x	x		x		
Daily Checks Plant	x	x		x		
Vehicle marshalling	x	x		x	x	
Waste handling	x	x	x	x		
Environmental Permitting	x	x	x	x	x	x
Complaints and Incidents	x	x	x	x	x	x
Spillage Procedure	x	x	x	x	x	x

## 2.7 Site Records

The TCM is responsible for ensuring the maintenance of site records.

### 2.7.1 Security and Availability of Records

<b>SHAW HAULAGE LIMITED</b>	<h1>Operating Procedures</h1>	
<b>Document Reference: EMS-OP-01</b>	<b>Issue Number: 2</b>	<b>Issue Date: 14.8.2023</b>

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

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

## **2.8 Site Diary**

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

- Start and finish of daily waste management activities on site (operational hours)
- Breakdowns
- Technically competent management attendance on site; the date and the time onto site and the time left site
- Weather conditions
- Complaints about site operations and actions taken
- Environmental problems and remedial actions
- Waste Treatment hours of operation

The site diary will be kept in the site office and updated daily.

## **2.9 Inspection and maintenance**

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

Plant and machinery on site is visually inspected by the operator before it is used as part of management of their own risks and health and safety. This is covered in training for staff and operatives. Each driver will complete a defect form which is kept in the cab. The Transport Manager is responsible for overseeing this and recording details.

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

### **2.9.1 Contingency**

To ensure all permitted waste quantities are adhered to, before the processing operation commences the operator will ensure it has:

- Contacted relevant plant hire companies to source alternative equipment and spare parts if required.
- Created a list of alternative facilities to take the waste.

The operations will be restricted to concrete crushing only. This allows the operator to manage the waste and products.

<b>SHAW HAULAGE LIMITED</b>	<b>Operating Procedures</b>	
<b>Document Reference: EMS-OP-01</b>	<b>Issue Number: 2</b>	<b>Issue Date: 14.8.2023</b>

The crushing will only take place when there is sufficient quantities of waste to process. There are several storage bays on site to ensure waste and products are securely stored.

The crusher and mobile plant are on a planned preventative maintenance programme and work can continue to ensure capacity is maintained. If the crusher breaks down, the operator can hire a second crusher to continue operations. This also applies to the mobile plant.

The operator has staff that trained in multiple areas and can be redeployed if required. If necessary, agency staff can be recruited to fill any staff shortages.

The operator has established outlets for products, which will ensure capacity is maintained.

The operator has contingency measures for dust management. In the event of a complete failure, combined with a Met Office alert for high winds, the operators will cease until conditions improve and alternative dust suppression implemented.

There is sufficient storage capacity for storing products and any materials that fail the end of waste test.

The contingency measures will be tested during the first 12 months and updated if necessary.

These measures comply with Paragraph 2.4 of the guidance.

## **2.10 Routine Cleaning**

The site will be cleaned daily. The cleanliness of the site will be checked as part of the daily site checks. This is recorded on the daily check form.

The entire site is concreted.

## **2.11 Complaints**

### **2.11.1 Roles and Responsibilities**

The Site Management has responsibility for this procedure.

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

### **2.11.2 Definition**

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

### **2.11.3 Procedure**

When the site receives a complaint, a record is summarised in the Site Diary. Full details will be provided on the incident form, EMS-FR-02.

All staff based in the office will be trained on recording complaints and to make sure they notify the Site Management immediately.

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

<b>SHAW HAULAGE LIMITED</b>	<h1>Operating Procedures</h1>	
<b>Document Reference: EMS-OP-01</b>	<b>Issue Number: 2</b>	<b>Issue Date: 14.8.2023</b>

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

## **2.12 Decommissioning**

In the event that operations cease and the permit is to be surrendered, arrangements will be made to decommission the site in accordance with the closure plan.

This complies with Paragraph 2.5 of the guidance.

<b>SHAW HAULAGE LIMITED</b>	<h1>Operational Procedures</h1>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 2</b>	<b>Issue Date: 14.8.2023</b>

### 3 WASTE HANDLING PROCEDURES

#### 3.1 Waste Deliveries to Site

At the time of booking, the customer will be advised of the wastes that are permitted to be deposited at the site. Shaw Haulage provide a specific service for moving waste concrete, bricks, rubble and soils. They will be advised that wastes including asbestos, hazardous waste, are not permitted at the site.

The vehicles are either grab loaders or 8-wheeled trucks. The former requires the driver to use the grab to load the waste at the source. This can therefore be visually checked at the point of collection. For the 8-wheeled trucks, the driver will visually inspect the waste before it is loaded onto the vehicle.

All vehicles meet Euro 6 emission rating.

All loads in open 8-wheeled trucks will be sheeted.

The office staff will ensure that the waste to be delivered/collected is sufficiently described to ensure it complies with the permit. This will include:

- Source
- Nature and composition
- Volume
- Any soil reports.
- EWC code

The site staff will confirm with the TCM that there is sufficient capacity on the site to manage the expected volume.

If there is any doubt about the nature of the waste, the TCM will request a classification report to comply with WM3.

This complies with Paragraph 3.1 of the guidance.

#### 3.2 On Site Waste Acceptance

The driver will arrive at the site and use the weighbridge. The Waste Transfer Note will be handed and completed by the site office.

Once instructed to unload, the vehicle will reverse into the unloading area. At this time, the machine operator will check the load and observe if any non-permitted waste has been deposited. As the driver has some control at the loading stage, it is unlikely that non-compliant waste will be received.

If the TCM or other site staff have any concerns about the nature of the waste, it will not be permitted to unload. The vehicle will be held until the material can be checked.

This complies with Paragraph 3.3 of the guidance.

<b>SHAW HAULAGE LIMITED</b>	<b>Operational Procedures</b>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 2</b>	<b>Issue Date: 14.8.2023</b>

Once waste has been unloaded, any non compliant waste will be removed. For the type of waste this could typically include plastic wrapping. The waste will be placed in to a bin or storage container.

As the incoming waste will be from uncontaminated sources, the risk associated with any non-compliant waste will be low.

Any quarantined waste will be removed from the site on a weekly basis. The operator has spare containers to maintain the capacity required. This complies with Paragraph 3.3 of the guidance.

Any incidents of non-conformance will be recorded in the Non-Permitted Waste Form EMS-FR-01 and corrective action taken.

All staff will be trained to oversee waste acceptance procedures, particularly during the unloading stage.

The operator has a weighbridge which will allow a daily tonnage report to be provided. The TCM will check the storage bays daily and maintain a record of waste and product storage volumes. This will be a manual record updated daily.

The records will be kept for 2 years.

This complies with Paragraph 3.4 of the guidance.

### 3.3 Overview of Waste Processing

The site layout is shown on Drawing No. SHL-LAY-01. A process flow diagram is provided in Figure 1. The majority of the waste to be accepted at the site will be concrete, bricks and soil. The waste codes set out in Table 1 provide the main list of waste to be accepted and its destination on site.

**Table 1 –Wastes Typically Accepted at the Site**

<b>EWC Code</b>	<b>Description</b>	<b>Comments</b>
17 01 01	Concrete	Crushed
17 01 02	Bricks	Crushed
17 01 03	Tiles and ceramics	Crushed
17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06	Crushed
17 03 02	bituminous mixtures other than those mentioned in 17 03 01	Stored in bay
17 05 04	Soils and Stones	Stored in bay
20 02 02	Soils and Stones	Stored in bay

<b>SHAW HAULAGE LIMITED</b>	<b>Operational Procedures</b>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 2</b>	<b>Issue Date: 14.8.2023</b>

The site has been designed with storage bays and perimeter walls. The site comprises of hardstanding.

The concrete and bricks will be stockpiled and when sufficient quantities are stored, the waste will be crushed using a Rubble Master 90.

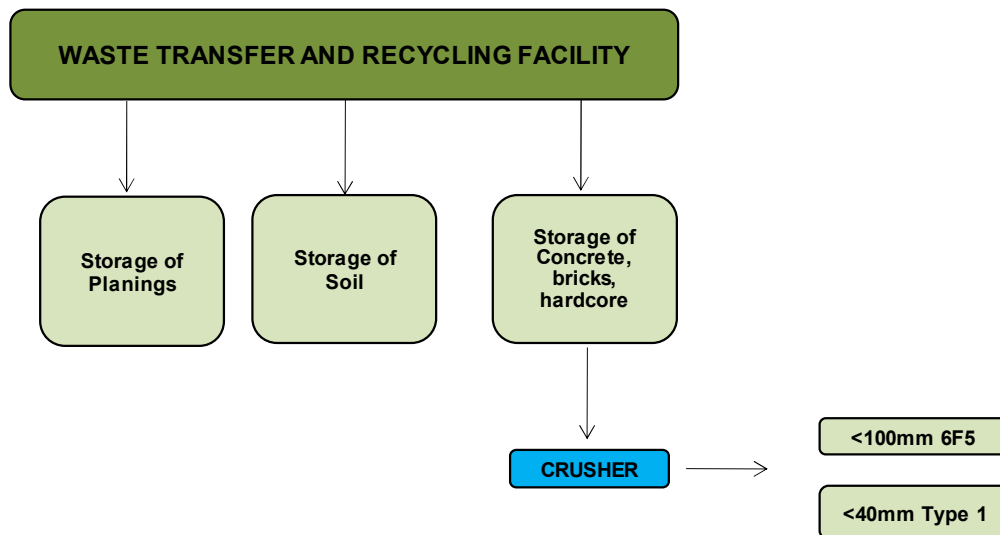
The crushing process will produce two materials:

<40mm	Type 1
<100mm	6F5

This material will be produced in accordance with a Factory Protocol to achieve End of Waste status and comply with the Quality Protocol.

Once the material has been produced, it will either be transferred using a loading shovel to the storage bays, or directly loaded into a vehicle for off-site transfer. Transfer to the storage bays will be necessary to manage processing capacity but will only be used if required to avoid double handling.

**Figure 1 – Process Flow Diagram**



This complies with Paragraph 5 of the guidance.

### 3.3.1 Waste Storage and Quantities

The annual permitted throughput of the facility will be 250,000 tonnes.

The process capacity of the crusher is 200 tonnes per hour. It is proposed to crush on a campaign basis, thus achieving a rate of 1000 tonnes per week.



<b>SHAW HAULAGE LIMITED</b>	<b>Operational Procedures</b>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 2</b>	<b>Issue Date: 14.8.2023</b>

The maximum storage limits are set out in Table 2.

The specified waste management operations include waste disposal and waste recovery operations listed Annex IIA and IIB of The Waste Framework Directive 2008/98/EC and are:

- R3: Recycling or reclamation of organic substances.
- R5: Recycling or reclamation of other inorganic materials.
- R13: Storage of waste pending recovery

**Table 2 Storage Limits (Cross Refer to Drawing No SHL-LAY-01)**

<b>Waste Type</b>	<b>Storage Area</b>	<b>Max. Pile Height</b>	<b>Max. Volume</b>
Unloading Area	15m x 15m 225m <sup>2</sup>	4m	600m <sup>3</sup>
Metal (removed from crusher)	5mx5m 25m <sup>2</sup>	4m	70m <sup>3</sup>
<40mm (pending certification)	5mx5m 25m <sup>2</sup>	4m	70m <sup>3</sup>
<100mm (pending certification)	10mx10m 100m <sup>2</sup>	4m	250m <sup>3</sup>
Aggregate Bay A	10mx10m 100m <sup>2</sup>	4m	250m <sup>3</sup>
Aggregate Bay B	10mx10m 100m <sup>2</sup>	4m	250m <sup>3</sup>
Aggregate Bay C	10mx10m 100m <sup>2</sup>	4m	250m <sup>3</sup>

This complies with Paragraph 4 of the guidance.

### 3.3.1 Quarantine Area

The site will have visual checks to minimise the incidents of receiving non-compliant waste.

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

### 3.3.2 Fuel

Any fuel on site will be stored in accordance with the Oil Storage Regulations. The fuel will be stored in a bunded tank, capable of storing 110% of the total capacity. The tank will be checked daily as part of the site checks.

All staff will be trained in the safe refuelling of plant.

<b>SHAW HAULAGE LIMITED</b>	<h1>Operational Procedures</h1>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 2</b>	<b>Issue Date: 14.8.2023</b>

## 4 EMISSIONS MANAGEMENT AND MONITORING

### 4.1 Introduction

An Environmental Risk Assessment has been prepared for all operations at the site. These procedures are based on the risks identified in the Risk Assessment. See SHL-ERA-V1.

This chapter complies with Chapter 6 of the guidance.

### 4.2 Fugitive Emissions to air – dust, mud and litter

Procedures for preventing emissions to air from waste handling.

- All waste will be received and treated within a concrete bay.
- A banksman will be used to assist vehicle manoeuvring and to prevent vehicles from tracking over waste.
- Vehicles leaving the site will be checked and if necessary, a hose and brush will be used to clean the wheels.
- A road sweeper will be deployed as necessary.
- There is approximately 70m of concreted access road before main highway.
- Plant and machinery will be cleaned on a weekly basis.
- Road vehicles will be checked daily and cleaned weekly.
- Speed restrictions on site limit dust arising from waste vehicles. Limit is 5mph.
- Anti-idling training. All vehicles to be switched off when not in use.
- Crushing to take place only 1-2 days per week. The days can be selected based on weather conditions.
- Crushing to take place behind a 6m high barrier.
- Stockpiles to be kept 0.5m below barrier wall (either 3.5m or 5.5m depending on the wall).
- Aggregate Bay walls 4m high, with 0.5m freeboard against the wall.
- Use of dust suppression, either hoses, water bowser or cannon
- Weather forecast checked at the beginning of each week. Work to be planned around weather alerts.

A Dust Management Plan, EMS-OP-02, is provided as a separate report.

Litter is not typically associated with this operation. The risk of litter is low/negligible. There may be occasions when plastic litter is encountered in the waste. Any such waste will be segregated and placed in a storage container (1100 litre bin).

Site operatives will receive training to observe such waste and to manually remove for secure storage.

<b>SHAW HAULAGE LIMITED</b>	<h1>Operational Procedures</h1>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 2</b>	<b>Issue Date: 14.8.2023</b>

Extra controls will be in place during windy conditions. The TCM will carry out additional checks and if necessary, instruct operatives to carry out litter picking. The perimeter walls and fence will help to prevent litter escaping the site boundary.

#### 4.3 Odour

Odour is not associated with the proposed operation or waste types.

#### 4.4 Noise

The site operations can meet the Standard Rules permit except for being within 500m of Medway Estuary and Marshes Ramsar, SSSI and SPA. This is 360m from the permit boundary and 430m from the noise source (crusher).

At this distance, the noise will not affect this receptor.

Good practice and the following procedures will be implemented for minimising noise:

- Operations of plant and machinery during defined working hours.
- Crusher will only be used 1-2 days per week.
- Crushing will only take place between the hours of 9am and 3pm, Monday to Friday.
- Use of concrete walls to provide storage bays.
- Crusher to be operated in a fixed position behind a 6m high barrier.
- Vehicles will not be allowed to idle on site and drivers will be requested to turn engines off if they are waiting for inspection or unloading instructions.
- Any complaints from neighbours regarding noise will be dealt with through the Incident Reporting Form and management will be informed.

#### 4.5 Fugitive emissions to groundwater

There will be no fugitive or point source emissions to groundwater. The site will receive and treat non-hazardous waste.

The waste will be treated on hardstanding.

The concrete bays will be constructed using a concrete base with concrete walls. The base will have a gradual slope towards the rear of the bay, to enable water to drain to the low point. The bays will contain wastes or products that have some capacity to store water. It is unlikely that water will be stored in the bays. In the event that water is collected in the bay, it will be pumped to a holding tank and used for dust suppression.

The main operational yard has a hardcore surface which is permeable. The waste acceptance procedures will ensure that only uncontaminated waste is received at the site.

The operations would comply with the Standard Rules permit which allows operations to take place on hardstanding or an impermeable surface with sealed drainage. In this case, the waste will be treated on hardstanding.

<b>SHAW HAULAGE LIMITED</b>	<h1>Operational Procedures</h1>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 2</b>	<b>Issue Date: 14.8.2023</b>

If there is any sign of degradation or contamination on the hardcore surface, it can be dug out and removed from the site. The surface will be repaired using clean hardcore produced on site.

Any fuel on site will be stored in a bunded fuel tank.

#### **4.6 Pests, Vermin and Birds**

A pest contractor will be contracted to assess any infestations and advise on appropriate action.

#### **4.7 Point Source Emissions to air**

There are no point source emissions to air.

#### **4.8 Point Source Emissions to Surface Water**

There will be no point source emissions to surface water.

#### **4.9 Point Source Emissions to Foul Sewer**

There will be no point source emissions to foul sewer.

#### **4.10 Monitoring**

Visual monitoring points will be set up around the site to check for signs of dust. The monitoring locations are shown on the site plan. Monitoring will be carried out twice daily during normal operating conditions. During windy weather conditions, the TCM will carry out additional monitoring and depending on conditions will stop waste operations, and/or increase dust suppression.

There is no requirement for emissions monitoring or limits, as set out in Chapter 7 of the guidance.

<b>SHAW HAULAGE LIMITED</b>	<h1>Operational Procedures</h1>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 2</b>	<b>Issue Date: 14.8.2023</b>

## 5 ADDITIONAL MEASURES

### 5.1 Raw material inputs

A bunded diesel tank will be provided on site. This will be positioned outside, away from site operations. It will be stored in accordance with the Oil Storage Regulations.

Spillage procedures have been set out in EMS-OP-02. Training will be provided for staff that require use of the diesel tank.

### 5.2 Waste Minimisation Audit

The operation is primarily waste storage and treatment. The treatment process is specifically designed to recovery waste. There will be limited residues generated, other than occasions non-compliant items such as plastic wrapping. This will be captured for treatment or disposal.

The primary purpose of this facility is to comply with the circular economy, ensuring that waste is turned into a resource. This complies with Chapter 9 of the guidance.

### 5.3 Waste Recovery or Disposal

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

### 5.4 Water Use

Water will be used to provide dust suppression, although this will be minimal. Rainwater will be collected from the roof and stored on site for dust suppression.

No water will be used in the process.

### 5.5 Energy Efficiency

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

There are potential energy efficiency improvements to be made including basic energy awareness measures such as energy saving light bulbs, insulation and switching off lights when rooms are not in use. The latter can be applied to all energy-consuming appliances providing that the measure does not compromise safety or essential operating needs.

The operator will ensure the continual improvement of techniques used on site, as well as the long-term monitoring of innovative techniques that appear on the market during the life of the site. These may include further energy efficient measures, potential 'cleaner' fuel options and energy efficient systems for environmental protection.