**Greenway Environmental Limited**

Medway City Estate

Enterprise Close

Rochester

Kent

ME2 4LY

**Management System**

**Reference ROC004**

**Issue 2**

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# introduction

## Background

##### This Management System relates to the Rochester Hazardous Waste Transfer Station, Rochester, Kent, ME2 4LY. The site layout and boundary are shown in Drawing SPROC003 A/D. The site is leased by GRG Waste UK ltd, and operated by Greenway Environmental Ltd.

##### The site is operated under the conditions of a waste management permit issued by the Environment Agency, which is reproduced in Appendix 1 of this Management System. This permit is currently under variation. This Management System refers only to the activities being included within the variation.

##### Waste streams suitable for the process are collected by Registered Waste Carriers. The Transfer Station is operated by Greenway Environmental Limited. The process involves the collection of various waste streams that are being disposed of by the customer. The streams are placed into storage prior to disposal or recovery.

##### A copy of the Management System will be kept in the site office.

##### The Management System is a controlled document. Any proposed modifications to this Management System will be notified to the Environment Agency in writing and will only be implemented in accordance with prior written notification of the E.A.

## Contact Details

**Licence Holder**

Greenway Environmental Limited

Medway City Estate

Enterprise Close

Rochester

Kent

ME2 4LY

**Head Office**

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**Regulator**

Environment Agency

Orchard House

Endeavour Park

London Road

Addington

West Malling

Kent

ME19 5SH

Tel: 01732 875 587

IPPC Permit No EPR/WP3036ZR

# site description

## Specified Site and Waste Management Operations

### Specified Site

##### The site boundary and the site layout for the purposes of the waste management permit are shown on Drawings SPROC003A.

### Specified Waste Management Operations/Activities

##### The following operations are carried out at the site:

The activities listed in the IPPC permit reference WP3036ZR following variation as per the proposal documents ROC001 and ROC002

##### The types of wastes to be subject to the waste management operations and limits in relation to throughput, storage and time limits set out in proposal ROC001 and ROC002

##### The activities will be managed and operated in accordance with management systems via current Greenway certification pending inclusion

##### ISO 9001 Quality management system

##### ISO 14001 Environmental management system

##### ISO 45001 Health and Safety management system

##### And all current legislation and guidance appropriate to the licensed site

##### The areas of the site to be used for the following operations are shown on Drawing SPROC003A:

* Transfer reception area for the compliance checking of wastes
* Storage bays for the holding of wastes
* Skips
* Site Office and Lab

## Permitted Categories, Types and Quantities of Waste

##### The site can accept wastes that are listed in;

##### IPPC Permit (reference WP3036 ZR) variation proposal ROC001. This permit is in the process of being varied. All existing healthcare waste treatment activities are to be removed. A new set of activities will be added for hazardous waste storage and transfer are to be added, and this management system will only reference those transfer activities.

##### The transfer station is not permitted to accept Hazardous waste with the properties set out in Table 1.4.

**Table 1.4 Properties of Hazardous Waste that are not Permitted**

|  |  |
| --- | --- |
| **Hazard Code** | **Hazardous Properties** |
| H1 | Explosive |
| H9 | Infectious |
| N/A | Highly malodorous wastes liable to cause serious detriment to the amenity of the locality |

## Hours of Operation

##### The permitted hours of operation are defined are as follows:

|  |  |
| --- | --- |
| **Period** | **Receipt and Despatch of Waste**  **and Operations** |
| Monday to Friday | 0000 hrs to 2359 hrs |
| Saturdays | 0000 hrs to 1700 hrs |
| Sundays | 0700 hrs to 1600 hrs |
| Public Holidays | 0700 hrs to 1600 hrs |
|  |  |

##### The operations will only be undertaken between the hours set out above.

## Staffing and Supervision

##### The site management team will be as follows:

* + Technically Competent Senior Management
  + Site Chemist (minimum HNC Chemistry)
  + Site Operatives

NB The technically Competent Management and Site Chemist may be the same person.

##### During the hours when the site is open for the receipt and despatch of wastes or carrying out the operations there will be a minimum of one member of staff on site who is fully conversant with the requirements of this Management System and the Waste Management Permit.

##### The Environment Agency shall be notified within 7 days of any changes in technically competent management and the name of any incoming person together with evidence that such person has the required technical competence.

##### The Environment Agency shall be notified within 14 days of the licence holder and/or any relevant person being convicted of a relevant offence (unless such information has already been notified to the Environment Agency), with details of the nature of the offence, the place and date of conviction, and the sentence imposed.

##### The Environment Agency shall be notified within 14 days of the licence holder and/or any relevant person lodging an appeal against a conviction for any relevant offence and of the outcome when the appeal is decided.

# Site engineering for pollution prevention and control

## Engineered Containment and Drainage System in the Service Yard

### Concrete Slab and Bunding

* + 1. All operations are undertaken in the Buildings and Yard as shown in Drawings SPROC003A. The Yard consists of an impermeable concrete pavement formed by a concrete slab which is bunded on all sides by sealed concrete blocks

The buildings are of cladding and steel portal framed construction. Portacabins are used for site offices and laboratory facilities

The storage bays are constructed as individual bunds of sufficient capacity to contain 110% of the volume of the largest container or 25% of the total volume of pourable material stored – whichever is the larger.

### Drainage

* + 1. The storage areas include racking. Both the racking areas and storage bays have its own individual sump and/or drainage channel in order to maintain segregation of incompatible materials in the event of spillages. The sumps and channels within storage areas have no connection to the drainage system off site. Batteries are stored in sealed shipping containers. Storage includes fire rated chem safes with individual sumps for storing oxidising waste, dangerous when wet, and spontaneously combustible materials. Aerosols are stored inside a lockable, sealed shipping container with adequate ventilation.
    2. Site drainage is self-contained via shut-off valves that remains closed when not in use. The valves are controlled by the site manager and only opened following surface water tests by a qualified chemist.

### Inspection and Maintenance

* + 1. The concrete slab and associated bunding will be inspected daily and a record made. Staff are instructed to report any defects that adversely affect the permeability of the floor slab. Any defects will be made good immediately.
    2. Wherever practicable defects will be repaired within 7 working days.
    3. A note of all defects and repairs will be made in the site diary.

# Site infrastructure

## Site Security

### Security Equipment

##### The perimeter of the Site is secured with fencing and walls. The site is located away from watercourses and housing. The location is such that only persons visiting the industrial estate on specific business would have reason to pass the site. ie it is not on a through route.

##### Site fencing consists of galvanised steel palisade fencing 1.8 metres high with vehicle access and exit via 2 double leaf palisade gates with slip latch and drop bolt. The gates are locked with a padlock during non-operational hours.

##### The Service Yard has security lighting which is automatically switched on during the hours of darkness.

### Operations

##### Outside operational hours all gates and doors to the Yard and buildings are closed and secure.

##### All visitors are required to contact the Site Reception after entering the holding zone

##### Delivery drivers are required to contact Site Reception after entering the holding zone.

### Inspection and Maintenance

##### The site perimeter and security equipment will be inspected daily at the commencement of operations and a record made of the inspection. Defects will be made good immediately to prevent unauthorised access.

##### Wherever practicable, damage will be repaired within 7 working days.

##### A note of any defect, damage or repair to security equipment will be made in the Site Diary.

##### A note of any security incident will be made in the Site Diary.

# SITE OPERATIONS

## Control of Mud and Debris

##### The site will not be a significant source of mud and debris. All site surfaces are constructed from impermeable material.

##### Incoming vehicles are unlikely to be contaminated with mud. All vehicles delivering and removing waste from the site are enclosed. All skips are sheeted prior to uplift.

##### Staff will monitor vehicles for mud and debris throughout the hours of operation. If any significant deposits of mud or debris are noted, they will be removed immediately.

##### Visual inspection for mud and debris will be undertaken each working day and a record made.

##### Any significant mud or debris incidents will be recorded in the Site Diary.

## Potentially Polluting Leaks and Spillages

### Preventative Measures

* + 1. Engineering pollution prevention measures including the bunded Yard drainage system are detailed in Section 2.
    2. Details of waste storage methods are given in Sections 4.4 and 4.6. All waste is stored in the storage area as shown on Drawing SPROC003A

### Operations

##### Staff are trained to monitor for leakage throughout the hours of operation. Any leaks or spills detailed are dealt with immediately as set out in the remedial measures.

##### All waste storage areas and containers are inspected daily, and a record made.

##### A record will be made in the Site Diary of any leaks or spillage incidents.

##### The Environment Agency shall be informed, in writing, As per schedule 5 notification as detailed in permit conditions 4.3.1 and 4.3.2

### Remedial Measures

##### The spillage action plan is reproduced at Appendix 2 of this Management System. spillage kits are located around site and will cover all areas at risk of spillages.

### Equipment

##### Equipment kept on site to deal with spillage is detailed in Appendix 2.

### Staff Training

##### Staff are trained in the remedial measures for spillage control. Records of all training are retained.

##### A spillage incident training exercise is undertaken once per year and a record made in the Site Diary.

## Fires on Site

##### Emergency procedures are defined in Appendix 4.

##### A “grab pack” of information useful in an emergency shall be kept at the Site Reception to be readily and safely accessible in any reasonably foreseeable emergency situation. This information shall include emergency contact telephone number, a site plan showing access routes, utilities drainage, location of any firefighting equipment and a plan of the waste storage areas showing maximum quantities and hazards of waste on site

##### A note will be made in the Site Diary of any fires, explosions or related incidents that occur on site.

##### Fire risk assessments are included for all site activities. A hot work permit system is in place to control activities such as welding.

## Waste Acceptance and Control Systems and Procedures

### General

##### The waste control and acceptance procedures are set out below and include consideration of the following steps in the waste control system:

* Pre-acceptance
* Waste acceptance
* Storage of wastes
* Waste despatch
* Quarantined waste
* Plant and equipment

##### All consignments of hazardous waste will be subject to the requirements of the Hazardous Waste Regulations 2005 and any subsequent legislation that may replace these regulations.

##### All waste transport will be undertaken by registered waste carriers.

##### Wastes shall only be accepted if of a type and quantity referred to in Section 1.2

##### Wastes shall only be accepted at the site in accordance with the following procedure;

* + 1. Wastes shall be pre-booked to ensure the site has the capacity to handle and store the waste and that the appropriate measures are taken to confirm with the waste producer that the waste is suitable.
    2. All vehicles bringing waste to the site shall be directed to park adjacent to the transfer reception area indicated on Drawing SPROC003A. Prior to offloading the number of containers shall be counted to ensure that the number agree with the accompanying paperwork. A visual inspection shall of the condition and stability of the load. During offloading each container shall be checked off against the accompanying list. The containers will be placed into the transfer station reception area. Once the documentation has been agreed with the load, the list shall be checked against the Environmental Permit to ensure that the EWC codes are acceptable. When approved the documentation can be signed and the driver may leave the site.
    3. Each container in the load shall be checked in accordance with the work instruction included as appendix 5.

### Pre-Acceptance

##### All enquiries relating to wastes for the site will be directed to the technical department

##### The technical assessor dealing with the enquiry will undertake the following:

* Check that the waste will conform to the permitted waste types.
* If appropriate, obtain a representative sample of the waste stream
* The technical assessment shall be made by a suitably qualified person with a minimum of a degree or equivalent in Chemistry.

##### The technical assessment shall determine the following information;

* + - The type of process producing the waste
    - Appropriate Safety Data sheets
    - The specific process from which the waste derives
    - The quantity of waste;
    - Chemical analysis of the waste (individual constituents and as a minimum their percentage compositions) [see 4.4.9]
    - The form the waste takes (solid, liquid, sludge etc)
    - Hazards associated with the waste

##### Sample storage and preservation techniques where applicable.

##### The age of the waste

##### Any potential for self-heating, self-reactivity, or reactivity to moisture in air

##### Any available knowledge regarding previous waste holders

##### If a sample is obtained it will be subjected to analysis to determine suitability for disposal at the site. The analysis may be carried out in house or by a third party, dependent upon the extent of the analysis required. In certain circumstances an analysis may be provided by the producer. All samples will be accompanied by a customer declaration. Note- any analysis should be actual and not extrapolated from datasheets. Analysis must be carried out by a Quality Assured laboratory. The analysis carried out must be appropriate to the waste stream and must include;

##### Confirmation of declared constituents

##### Hazardous characteristics

##### Physical Appearance

##### Colour

##### pH

##### Odour

##### Oxidising Properties

##### SG where possible

##### Further analysis may be carried out for parameters relevant to the method of treatment or waste stream eg acid strength for acids etc.

##### Samples should be taken by technically competent personnel and be representative. A declaration should be obtained detailing;

* + - * location of sampling point, for example, effluent tank
      * capacity of vessel sampled (for samples from drums an additional parameter would be the total number of drums)
      * method of sampling, e.g. sampling tap (mid flow), “top” sample
      * number of samples and degree of consolidation
      * operating conditions at time, e.g. normal operation, shut-down, maintenance and/or cleaning
      * preservation techniques

All samples shall be labelled with a unique reference number to enable tracking through the system and cross referencing with the enquiry.

##### For each type of material in the enquiry a disposal route shall be determined and costed prior to the issuing of the quotation.

##### If the waste can be accepted, the customer will be provided with the terms and conditions of acceptance and a price quoted.

##### The Pre-Acceptance data shall be filed and maintained at the site for a minimum of three years for cross-reference and verification at the waste acceptance stage.

##### On receipt of a customer order a unique batch number will be allocated and the following information confirmed with the customer:

* Waste description and quantity
* Specific exclusions
* Price
* Collection/delivery date
* Unique batch number.

This will take the form of a booking form and a copy of the list which the customer is obliged to sign and return before the order can be accepted. When the signed booking form is received it shall be passed to the technical assessor who will retrieve the pre-acceptance file and review the data before approving the booking. At this stage the site management will assess the storage capacity for all waste streams intended to arrive. Should storage capacity not exist, waste will not be accepted.

##### For laboratory smalls a full list shall be produced and transported with the waste. A copy of this procedure shall be supplied to Customers who wish to pack their own laboratory smalls. In most circumstances suitable qualified Greenway employees would carry out the listing and packaging at Customer sites.

### 

### Waste Receipt at Site

##### Waste will only be accepted by prior arrangement as set out above and will be subject to the consignment note procedures.

##### All drivers will arrive and make their presence aware to site staff before entering the site.

##### All vehicles authorised to enter the site will enter through the entrance gate.

##### All waste deliveries will be weighed via the weighbridge.

##### 

##### All waste delivered to the site by will be subject to visual inspection and checks at the point of unloading to confirm the following:

* The waste is of a conforming waste type
* The types and quantities conform with the confirmed customer order

##### The labelling is in order

##### The caps/lids are well fitting and secure

* The condition and stability of the load
* All waste containers are fit for purpose and in suitable condition
* The weight determined if appropriate
* Ensure the site has sufficient capacity\*
* Old labels removed
* Documentation is in order detailing;

• The physical and chemical composition

• hazard characteristics and handling precautions

• Compatibility issues

• Information specifying the original waste producer and process

Any damaged, unlabelled or corroded containers shall be placed into the quarantine area immediately and action taken to rectify the fault. Quarantine storage is a maximum of 5 working days from receipt. All faults will be rectified within this time

\*An active stock list is produced on a daily basis by the Site Manager or deputy. This document, and the daily site checks, are used by the Site Manager or deputy to assess the site capacity.

##### Tankers delivering bulk wastes to site will be directed to within the holding area. The previous washout certificate will be checked with the consignment notes. A sample shall be taken through the top hatch of the vehicle using a core sampler. The sample shall be taken by staff employed by Greenway Environmental Ltd. In certain cases a sample may be offered by the driver of the vehicle. Unless there are exceptional circumstances (e.g. safety reasons) this sample should be declined. In certain circumstances if may be appropriate to take two sample, one from the bottom valve and one from the top hatch. This would be useful if the waste is two phase. The waste will undergo inspection as in 4.4.20 and analysis as in 4.4.28. Documentation appertaining to the previous load or tank wash certificate shall be reviewed to determine the likelihood of contamination. All equipment used for the offloading of tankers shall be in good condition, of the correct size suitable for its intended purpose. The offloading shall only take place under the direct supervision of suitably qualified Greenway Environmental employees.

##### The procedures for waste acceptance shall be carried out prior to processing and no later than 24 hours after receipt. The waste shall be unloaded into the waste reception area as indicated on drawing SPROC003A. Waste should only be unloaded if there is adequate space in the reception area to receive the load. The waste reception area is checked on a daily basis by the Site Manager to ensure that there is no materials exceeding the 24 hour limit by checking the date on the label applied on receipt.

##### Laboratory smalls shall in general undergo the same pre acceptance and site acceptance procedures as for all wastes. In the majority of cases for Greenway customers, chemists employed by Greenway will have segregated and packed the chemicals at the Customer site. In these cases, on receipt at the site, the containers shall be opened to ensure that the inner containers are not damaged before undergoing the acceptance procedures and being placed into appropriate storage. Where the laboratory smalls have been packed by another party, then on receipt at the site, the containers shall be emptied, checked for incompatibility, correctly segregated and repacked before the end of the working day of receipt. Where there are insufficient suitably qualified staff available, then laboratory smalls will not be accepted. The sorting and repackaging of laboratory smalls shall take place in a designated repackaging area indicated on drawing SPROC003A. When the repackaging has been completed, the containers shall be labelled in accordance with 4.4.29.

##### If a non-conforming waste load or part of a load, delivered by third parties cannot be resolved, then it will not be unloaded and a record of the rejection made. The Environment Agency will be informed and the consignor contacted.

##### Conforming wastes received from third parties will be referenced with the unique batch number.

##### Any wastes delivered that are identified on arrival as not conforming with the permitted waste types or the confirmed customer order will be held on the vehicle whilst an investigation is carried out. The waste will be processed as set out in ***Quarantined Waste*** below.

##### Conforming waste that is received will be offloaded into waste reception area.

##### A record of all waste that is received will be made, including the following details:

* Physical form of the waste
* Waste type, hazard code and EWC code
* Waste quantity
* Date received
* Date accepted
* Customer reference
* Unique batch number
* Consignment note number

### Waste Acceptance and Testing prior to storage

##### After offloading the waste is placed into the transfer reception area as shown on drawing SPROC003A. Each container will arrive with a transit label detailing the description and hazards. Each container will be opened and visually and physically checked to confirm compliance with the pre acceptance data. In many circumstances the waste will need to be sampled. The analysis carried out shall be determined by the reception chemist and will be appropriate to the nature of the material including as a minimum;

• the identity of the waste

• the description of the waste

• consistency with pre-acceptance information and proposed treatment method

• compliance with permit

On completion of the sampling, which must be a core sample taken from the bottom of the container, the bung/lid shall be replaced immediately after use and secured.

##### A written record of the analysis shall be made and signed by the chemist carrying out the analysis. The analysis will be stored in the relevant job folder on the server. After checking the container will be resealed. The waste is then labelled with:

##### The description of the waste showing its chemical identity and composition

##### Our unique tracking number for each delivery

##### Date of arrival on site

##### Any relevant hazard codes and transport UN number.

##### On completion of the whole load each of the containers will be placed into the designated storage area.

##### A copy of all documentation relating to the load, including the consignment note and list, analysis data, storage locations and pre-acceptance data shall be maintained at the site for a minimum of two years after the waste has left site. Five years for consignments notes. Backups of data made daily and the stored off site.

##### Records relating to the waste shall be held in a waste tracking system, which in addition to holding all the relevant data, also acts as a stock control system. The data held, which is detailed in other sections of this document, includes;

* the date the waste arrived on site
* the original producer’s details
* the previous holder
* a unique reference number
* waste pre-acceptance and acceptance information
* any analysis results
* the package type and size
* the intended treatment or transfer route
* accurate records of the nature and quantity of wastes held on site, including all hazards – and identifying the primary hazards
* where the waste is located on site
* where the waste is in the designated treatment or transfer route
* the names of staff who have taken any decisions about accepting or rejecting waste streams and who have decided on recovery or disposal options
* details that link each container accepted to its consignment or transfer note
* details of any non-conformances and rejections

##### 

### Storage of Wastes

##### After analysis, each container of the incoming load shall be placed into the storage area appropriate to the material type. Each container within the storage bays will be placed in lanes that are 1 pallet wide with a walkway of sufficient width to enable a person to walk the whole length of the bay and view the containers. The lanes shall be such that any spillages cannot spill over into an adjacent bay. The segregation of the differing material types will be carried out in accordance with HSG71 and is detailed in the work instruction at appendix 6. The racking will be designed, constructed, inspected and maintained to ensure that it remains sound. The maximum loading will not be exceeded. design and storage will consider substance leaks from a high to low level stock. The flammable storage area will be protected by fireproof cladding on the internal wall in order to separate it from all other storage The containers should be placed such that the labels are visible to anyone walking down the bay, IBC taps will face out into the walkways. Caps and lids should be secure. Storage of specific types of materials is detailed below.

##### Heat and Light sensitive substances should be stored under cover and should be removed from site as soon as practically possible due to the limited amount of undercover storage space.

##### Aerosols shall be stored inside a separate container unit that is vented at lower and upper levels.

##### Material in non-waterproof packaging should be stored undercover or repackaged to a waterproof container.

##### Each storage area shall be marked with the hazard of the material contained within it. A schedule of the contents of each bay is prepared and placed in a convenient location. The schedule relates the contents to the maximum capacity of the storage bay. When materials are added to or removed from the bay the schedule is amended accordingly.

##### A record of all input waste types, reference numbers, input volumes and output volumes shall be recorded to allow auditable tracking of all wastes accepted to the point at which they are disposed of.

##### The maximum duration of storage of any waste following treatment shall not exceed 6 months. The condition of all the containers and pallets shall be inspected on a daily basis and a record made. Any actions taken as a result of the inspection shall also be recorded. Damaged pallets should be replaced if the stability of the drums is compromised. Material should be removed from site as soon as practically and commercially possible, but always done so as to prioritise compliance.

***Bulking and Repackaging of wastes***

##### Certain waste streams may be bulked to take advantage of a more cost effective disposal route.

##### The materials for bulking shall be selected by the site chemist and will consist only of materials of a similar chemical nature.

##### The selected containers will be taken to a suitable area along with a suitable and clean bulking receptacle. The storage schedule will be amended to reflect that the selected containers have been removed from the bay.

##### Prior to the bulking operation each bulking container shall be allocated a unique reference number and a batching sheet prepared.

##### The selected materials for bulking shall be added to the batch sheet for that particular bulking container. The batch sheet shall consist of the description of the material, the quantity, its unique batch number, and its receipt date.

##### Each container within the selection shall be sampled. The samples shall be taken to the laboratory an undergo compatibility testing in accordance with the work instruction included in appendix 5.

##### Any of the selection of materials that are not suitable for bulking will be removed from the batch sheet and the containers placed back into storage, the schedule being amended accordingly.

##### The bulking process can now commence and must be carried out by or under the close supervision of a suitably qualified chemist. If bulking into tanks from drums, a pump and tube should be used to empty rather than pouring. When bulking onto tankers, vapour return systems should be used. The bulking of flammable liquids is detailed in the work instruction at appendix 5, and will take place in the area shown outside on SPROC003A, which will be protected from static build up and discharge via earth bonding.

##### If during the operation any adverse reactions are noted, the bulking should cease immediately, and the cause of the reaction investigated.

##### After the bulking operation is complete the empty containers and bulking container shall be taken to the appropriate storage area. The bay schedules shall be amended accordingly to reflect the changes.

##### If appropriate, metal containers that have been emptied may be washed before crushing and scrapping. The washings will be bulked to a suitable container and dealt with as other wastes on site.

##### Where over drumming has to take place due to damage to the container as a last resort and only in an emergency. The information on the original container should be transposed to the over drum. The damaged container shall have its contents repackaged as soon as convenient. Over drumming shall take place in the quarantine area.

##### The discharging of tankers in tanks, drums or IBC’s should take place in accordance with the work instruction in appendix 7.

##### Repackaging within warehouse must:

##### Must take place in the area marked on SPROC003A

##### Not pose any adverse reaction risks or change the waste description

##### Be packed with the same waste type intended for the dame disposal

##### Not repack waste which could be recovered with waste if this means that the waste must now be sent for disposal or a lower form of recovery.

##### Be recorded and stock updated to reflect storage changes and maintain full traceability.

### Waste Dispatch

##### Waste quantities from the transfer station will be monitored until a full load has been generated. Typically this is 88 x 200 litre drums or 24 IBC/Pallets, however this may be less for slow moving waste streams as the six month time limit approaches.

##### Waste will be despatched to a suitably licensed waste management facility, with reference to the pre-acceptance criteria (4.4.11), using a registered waste carrier and in accordance with the requirements of the waste management duty of care. The wastes will typically also be subject to the requirements of the Hazardous Waste Regulations or any subsequent legislation.

##### Waste containers will be visually inspected prior to despatch to check the integrity of containers and any labelling. Remedial action will be taken if appropriate.

##### All skips containing solid waste will be sheeted by the waste carrier prior to up lift to prevent escape of waste.

##### Copies of transfer notes and consignment notes will be completed and copies retained for the relevant statutory period.

##### A record will be made of all wastes despatched to include the following:

* Physical form of the waste
* Waste type, hazard codes and EWC codes
* Quantity removed
* Waste carrier
* Site of destination
* Drum numbers (where applicable)
* Consignment note number (where applicable)
* Date despatched

### Quarantined Waste

##### Non-conforming wastes will remain on the vehicle or in a secure location pending a resolution.

##### A note of all quarantined waste will be made in the Site Diary.

#### **Conforming Waste Types**

##### If waste has not been accepted solely because it exceeds the quantity agreed with the customer, then the customer will be contacted and a resolution sought.

##### If an agreement is made to accept the waste, it will be subject to the waste acceptance procedures outlined above.

##### If no agreement is reached with the customer, the waste will be returned to the site and the Environment Agency informed. Any relevant consignment note procedures will be followed.

##### A record of actions relating to the non-conforming waste will be retained.

#### **Non- Conforming Waste Types**

##### A record of actions relating to the non-conforming waste will be retained.

##### 

##### The non-conforming waste will either be returned to the customer or disposed of at a suitably licensed waste management facility. Any relevant consignment note procedures will be followed.

### Segregation of Incompatible Wastes

#### **General**

##### By the application of the procedures set out above, the majority of risks associated with the potential mixing of incompatible wastes are adequately controlled.

##### **Segregated Storage**

##### Storage on site will be in accordance with the guidance given in the following HSE publications, to ensure waste is appropriately isolated, segregated and kept apart:

* HSG71 Chemical Warehousing: the storage of packaged dangerous substances (1998)
* HSG 51 The Storage of Flammable Liquids in Containers (1998)

The storage areas are allocated as indicated on the site plan references SPROC003 A & B. The storage areas are variable in hazard but any changes from the site plans will be agreed with the EA before implementation.

The maximum storage for materials on site is 6 months.

### Plant and Equipment

##### Waste will be unloaded, loaded and moved within the site using the following equipment

* forklift truck(s)
* proprietary drum trolleys and lifting forks (internal and external use)
* proprietary pallet trucks.

##### All equipment will be maintained in accordance with the manufacturer’s instructions and records retained.

##### Appropriate precautions shall be taken during loading, unloading and internal transport of waste to prevent damage to equipment.

##### Redundant plant and equipment shall be decontaminated and removed.

##### ***Tank Storage***

##### Any Storage tanks which may be installed in the future will be located in a bunded area. NOTE – No Storage tanks exist on site currently. Before placing material into the tanks it should be ensured that the construction material is compatible with the proposed material to be added. The bund is of sufficient capacity to hold 110% of one tank. (The two tanks are the same capacity). All pipework connecting the tanks is above ground and painted in accordance with guidelines, with numbered valves attached to each tank. The tanks are fitted with overflow pipes which terminate in the bund, high level alarms and, where appropriate, abatement systems. The tanks should be labelled with the contents, the capacity and the hazards of the material. Any vents attached to the tanks should be routed to a system to prevent uncontrolled emissions.

##### The storage tanks will undergo a maintenance regime consisting of:

##### 

##### Periodic desludging

##### Periodic inspection

##### Periodic thickness testing

##### A written record of the tanks is maintained at the site detailing;

• unique identifier

• capacity

• construction including materials

• maintenance schedules and inspection results

• fittings (including joints and gaskets etc.)

##### • waste types that may be stored/treated in the vessel including flashpoint limit

## **Waste Sampling and Testing**

##### Analysis of all incoming waste streams is undertaken by a qualified chemist to confirm compliance with the Environmental Permit and Pre acceptance data

##### Any quarantined waste that is to be disposed of on behalf of the originator will be sampled and tested as appropriate. Advice will be obtained from the proposed specialist waste management contractor.

### Drum Washer

##### The drum washer will undergo daily pre-use maintenance checks, solution samples will be taken for analysis, noise and odour recorded and solution levels monitored.

##### The drum washer will operate between the hours of 6am to 10pm.

##### The drum washer will hold a maximum of 1000 Litres of solution

### Drum Washing

##### Only drums containing <1% residues will be washed.

##### Drums will be assessed for suitability of washing by a chemist upon receipt. The drums will need to be contaminated by less than 1% residues. After washing, the condition of the drum will dictate whether the drum is crushed for recovery or re-used.

##### Each drum will be labelled with a unique batch number and will be routed for washing which will indicate that the waste has been accepted.

##### Drums labelled for washing will be taken to the container warehouse.

##### A record of the unique batch number, quantity, description and date washed will be recorded prior to washing.

##### The records will allow auditable tracking of empty vessels from receipt to re-use/recovery

##### Washed drums will be crushed and skipped for recovery or stored on the backyard pending re-use.

##### Waste washing solution will be pumped into an IBC situated on a spill tray within the bund. The IBC is labelled prior to filling.

##### Wastes from the washing will be stored as set out in Section 4.6 of this Management System

##### The maximum duration from receipt to washing of any suitable material shall not exceed 6 months.

##### Equipment will be atex rated, intrinsically safe to account for flammable residues in containers.

## Waste Quantity Measurement Systems

### Incoming Waste

##### The weight of incoming waste is obtained via the on-site weighbridge, which will be serviced and calibrated annually.

## Storage of Wastes

##### The waste storage areas are shown on Drawings SPROC003A.

### Incoming Waste

##### Incoming waste shall only be stored in the storage areas shown in drawings SPROC003A. Each area shall l be clearly identified and marked with the relevant hazard classification.

##### 

##### Waste storage areas shall be appropriately separated by an adequate distance or physical barrier from the following

##### Materials which could propagate or aggravate the environmental impact in a fire

##### Environmental receptors which could be harmed by proximity.

##### Site housekeeping shall ensure the site is kept clean and tidy and prevent the accumulation of litter or combustible debris in or adjacent to waste storage areas.

### Inspection and Maintenance

##### All waste storage areas will be inspected once each working day and a record of the inspection will be retained.

## Transfer Station– Plant, Equipment and Procedures

### Design

##### Any equipment used will be proprietary equipment designed and manufactured specifically for the application Records of The manufacturers, suppliers and specification of equipment used in the transfer station, will be maintained at the site.

##### The equipment shall not be operated beyond the design specification.

### Installation

##### The installation, testing and commissioning will be undertaken by qualified electrical engineers.

##### A record of the electrical installation and commissioning will be retained.

### Operations

##### Suitably trained and qualified staff will undertake the transfer station operation. A record of training will be retained.

##### Operation of the Transfer Station will be undertaken in accordance with the Work Instructions in accordance with this Management System.

### Inspection & Maintenance

##### The equipment will be inspected visually before each operation. If any defects are identified the machine will be withdrawn from service and no further work undertaken until defects are remedied and machine passed fit for service.

##### A note of any defects, repairs and routine maintenance will be made and a record kept in the Site Diary.

##### A schedule of inspection and maintenance intervals will be kept for the machine noting items requiring maintenance and the frequency of the maintenance.

##### A record of maintenance will be retained for a period of at least 3 years.

## Training

All staff are trained in the permit, this management system and the appropriate work instructions. Signed copies of the current documents are maintained at the site. In the event of an updated version being issued, the staff will be trained in the new version and an updated copy signed and placed on file.

# POLLUTION CONTROL, MONITORING AND REPORTING

***Monitoring of meteorological conditions.***

5.1A record of the meteorological conditions on the days that the site is operational shall be kept in the site diary.

***Emissions and monitoring***

5.2.1 Emissions shall be monitored in accordance with the requirements of the IPPC permit reference WP3036ZR

***Climate Change Adaptation***

5.3.1 Temperature checks are performed regularly on site. Each summer in the UK brings higher temperatures and our waste checks are designed with that in mind. As temperatures exceed 30°C we increase the levels and frequency of those checks. All waste storage is under cover so as to shade from direct sunlight and avoid the effects of these increased temperatures.

5.3.2 Rainfall increases are monitored. The site contains fully bunded storage areas, so that in times of excess rainfall, these can be cleared to foul sewer without impacting the operation of the site or causing any flooding.

5.3.3 The site is a medium risk of flood within 12 months as per GOV.UK information, our storage areas are bunded and kept slightly higher than the main floor so as to separate as best as possible.

# AMENITY MANAGEMENT AND MONITORING

## Control and Monitoring of Dusts Fibres and Particulates

##### The site is unlikely to be a significant source of dusts, fibres or particulates.

### Operational Monitoring

##### The site boundary will be inspected for visual evidence of emissions of dusts, fibres or particulates once each working day at a time when waste management operations are being undertaken. A record of the inspection will be made.

##### Site staff will visually monitor the site for evidence of emissions of dusts, fibres and particulates throughout the hours of operation. If significant emissions are identified staff will inform the technically competent senior management.

##### Should any significant emissions be identified from the operations, remedial action will be taken immediately.

### Actions

##### Any complaints or reports relating to dusts, fibres or particulates from the operations will be investigated immediately.

##### The source will be identified and remedial action will be taken to prevent or minimize the emissions as soon as is practicable.

##### If the emissions of dust, fibres or particulates cannot be reduced to acceptable levels, the operation generating the emissions will be stopped as soon as it is safe to do so and not recommenced until remedial actions has been taken.

##### Any emissions, complaints and remedial actions will be noted in the Site Diary.

## Control of Odours

##### The site is unlikely to be a significant source of odours

### Operational Monitoring

##### The site perimeter will be subject to olfactory evaluation once each working day at a time when operations are being undertaken.

##### Site staff will monitor the site for evidence of odours throughout the hours of operation. If significant odours are identified staff will inform the technically competent senior management.

##### Should any significant odours be identified action will be taken immediately.

### Actions

##### Any complaints or reports relating to odours from the operations will be investigated immediately.

##### The source of the odour will be identified and remedial action will be taken to prevent or minimize the emissions as soon as is practicable. This may include improving the containment of any stored wastes causing odours or arranging for it to be consigned to a suitably licensed waste management facility as soon as is practicable.

##### Any odours, complaints and remedial actions will be noted in the Site Diary.

##### Containers to be opened carefully and resealed immediately on detection of malodourous substances that could cause serious detriment to the amenity of the locality

## Control and Monitoring of Noise

##### There are likely to be no significant sources of noise from the operations.

### Operational Monitoring

##### The site perimeter will be subject to aural noise evaluation once each working day at a time when operations are being undertaken and a record of the evaluation made.

##### Site staff will aurally monitor the site for evidence of elevated noise levels emanating from operations throughout the hours of operation. If significant elevated and persistent or recurring noise is identified they will inform the technically competent senior management.

##### Should any significantly elevated noise be identified as emanating from the waste management operations, action will be taken immediately.

### Actions

##### Any complaints or reports relating to noise from the operations will be investigated immediately.

##### The source of the noise will be identified and remedial action will be taken to prevent or minimize the noise as soon as is practicable.

##### If noise levels cannot be reduced to acceptable levels, the noisy operation will be stopped as soon as it is safe to do so and not re-commence until remedial action has been taken.

##### Any elevated noise levels, complaints and remedial actions will be noted in as part of inspection records.

## Control of Pest Infestations

##### The operations are unlikely to cause any pest infestations. A contract will exist with a national pest control company to ensure preventative measures and monitoring.

### Operational Monitoring

##### The site will be inspected once each working day for the presence of pests such as insects and vermin and a record of the inspection made.

##### If site staff identify any insect or vermin infestation they will immediately inform the technically competent senior management.

##### Should any infestation be identified, action will be taken immediately.

### Actions

##### Any complaints or reports relating to pest infestations from the operations will be investigated immediately.

##### A specialist pest control organisation will be contracted as soon as is practicable to eliminate the infestation.

##### The cause of the infestation will be investigated and wherever practicable the source will be permanently removed.

##### Any infestations, complaints and remedial actions will be noted as part of inspection records.

## Control of Scavenging Birds and Other Scavengers

##### The operations are unlikely to attract scavengers.

### Operational Monitoring

##### The site will be inspected once each working day for the presence of scavengers such as birds and foxes and a record of the inspection made.

##### If site staff identify any scavengers they will immediately inform the technically competent senior management.

##### Should any persistent scavengers be identified, action will be taken as soon as practicable.

### Actions

##### Any complaints or reports relating to scavengers will be investigated immediately.

##### Action will be taken to discourage scavengers, for example by removing any food source or improving enclosure to prevent access.

##### Any reports of scavengers, complaints and remedial actions will be noted as part of inspection records.

## Control of Litter

##### The operations are unlikely to be a significant source of litter.

### Preventative Measures

##### All solid wastes will be stored in proprietary skips or similar containers.

##### All solid waste skips will be securely sheeted before uplift from the site.

### Operational Monitoring

##### The site and the site perimeter will be inspected once each working day for the presence of litter and a record of the inspection made.

##### Site staff will visually monitor the site for litter during the hours of operation.

### Actions

##### Any litter within the site and any litter beyond the site boundary that emanated from the site will be collected as soon as is practicable and at least on the same working day.

##### Any complaints relating to litter will be investigated immediately and any litter emanating from the site collected as soon as is practicable.

##### Any complaints and remedial actions relating to litter will be noted as part of inspection records.

# information and SITE RECORDS

## Security and Availability of Records

##### The following records will be retained securely within the offices at the site:

* Site Diary
* Completed Routine Inspections
* Copy of Management System
* Copy of the IPPC permit
* Hazardous Waste Consignment Notes
* Duty of Care Transfer Notes
* Records of the following:
  + Waste types and quantities delivered, with dates
  + Waste types and quantities despatched, with dates
  + Waste tracking records (order numbers, batch numbers and drum numbers)
  + Pre-acceptance data
  + Daily throughput of the aerosol Destruction Plant
* Environment Agency inspection reports and related correspondence
* Testing, inspection, maintenance and calibration records as appropriate for the following:
* Laboratory Equipment
* LEV
* Shredding equipment
* Weighing equipment
* Forklift truck
* Gas test results for the abatement system
* RPE Filter check records

##### Site records will be available for inspection by the Environment Agency during operating hours.

##### Records will be retained for a minimum of 6 years, or any statutory period, whichever is the longer.

## Records of Waste Movements

##### A record will be kept of each load of waste accepted and removed from the site. The record will include the following details:

##### Loads in:

* Physical form of the waste type (hazardous waste further defined by hazard code and EWC code)
* Quantity (weight)
* Date received
* Date accepted

##### Loads out

* Physical form of the waste (liquids or solid)
* Waste type (including as appropriate, special waste type, hazard code and EWC code)
* Quantity removed (weight)
* Date removed

## Reporting

7.3.1 All reports and notifications required by the Permit shall be sent to the Environment Agency using the contact details supplied in writing by the Environment Agency.

7.3.2 A summary report of the waste types and quantities accepted and removed from the site shall be made for each quarter. It shall be submitted within one month of the end of each quarter, and shall be in a format required by the Environment Agency.

## Notifications

* + 1. The Environment Agency shall be notified without delay following the detection of:
       1. Any malfunction, breakdown or failure of equipment or techniques, accident or fugitive emission which has caused, is causing or may cause significant pollution.
       2. Any significant adverse environmental and health effects.

## 7.4.2 Written confirmation of actual or potential pollution incidents shall be submitted within 24 hours

## 7.4.3 Prior written notification shall be given to the Environment Agency of the following events and in the specified timescales:

(a) as soon as practicable prior to the permanent cessation of any of the activities

(b) cessation of operation of all or part of the activities for a period likely to exceed 3 months.

(c) resumption of the operation of all or part of the activities after a cessation of more than 3 months or after notification under (b) above.

7.4.4 The Environment Agency will be notified within 14 days of the occurrence of the following matters except where such disclosure is prohibited by stock exchange rules:

(a) Any change in the licence holders trading name, registered name or registered office address;

##### (b) Any change to particulars of the licence holders ultimate holding company (including details of an ultimate holding company where a licence holder has become a subsidiary)

##### (c) Any steps taken with a view to the licence holder going into administration, entering into a company voluntary arrangement or being wound up

##### (d) If the licence holder is not the operator: any change in the operators trading name; address; registered name or registered office address.

## 7.5 Site Diary

##### Records will be retained securely on site and will include the following events:

* Start and finish date for waste management operations undertaken at the site
* Plant maintenance dates and records of any breakdowns
* Problems with waste received and any actions taken
* Despatch of records to the Environment Agency
* Environmental problems and remedial actions
* Complaints and remedial actions
* Leaks and spillages and remedial actions
* Fire drills and external inspections of fire equipment
* Fires and remedial actions
* Routine inspections, tests and exercises, as set out in Table 7.1 below.

##### Routine inspections will be recorded on standard pro-forma.

**Table 7.1 Routine Inspections, Tests and Exercises**

|  |  |
| --- | --- |
| **Frequency** | **Items** |
| Daily | Site perimeter for security, dust, odour and noise  Site identification board  Security alarm  Site for pests, scavengers and litter  Waste storage and processing areas for leaks, spills, integrity of floors and kerbs  Building for integrity |
| Annually | Spillage drill  Fire drill |