RGE Recycling Limited

PERMIT NO: TBA Bespoke

SITE ADDRESS: RGE Recycling, Royal Eagle Close, Rochester, ME2 4NF

DOCUMENT REFERENCE NO: EMS-RGE-V1

PREPARED FOR: RGE Recycling

DATE: 10/10/2025

ENVIRONMENTAL MANAGEMENT SYSTEM

Version 1.0

SETTING OUT REPORT

This Environmental Management System document has been prepared by Enviroawards Limited on behalf of RGE Recycling (the Client) in support for the legal operation of a A20 waste metal treatment facility. A high level of skill, care, attention and diligence, taking account of the timescales and resources devoted to it by agreement with RGE Recycling as part or all the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

Information reported herein may be based on the interpretation of public domain data collected by Enviroawards and/or information supplied by the Client and/or its other advisors and associates. All information and data have been accepted in good faith as being accurate and valid.

This document may contain information of a specialised and/or highly technical nature, and the Client is advised to seek clarification on any elements which may be unclear to it.

Information, advice, recommendations and opinions in this document should only be relied upon in the context of the whole document and any documents referenced explicitly herein and should then only be used within the context of the appointment

EMS V1

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Version	Reason for Revision	Date of Revision	Reviewed By	Approved By
1.0	First Version of the new EMS document drafted and released to RGE Recycling Limited for review	First Draft	S. Griffiths	
1.1				
2.0				
3.0				
4.0				

1. Introduction

This Environmental Management System (EMS) has been prepared in accordance with Environment Agency (EA) guidance 'How to Develop a Management System' https://www.gov.uk/guidance/develop-a-management-system-environmental-permits

The EMS sets out best practice for operating the site based on legislation and appropriate measures adopted within the industry. The Operator is RGE Recycling Limited (hereinafter referred to as *RGE Recycling*), and this EMS is in support of a Bespoke Environmental Permit (EP) application.
RGE Recycling at, Royal Eagle Close, Rochester, ME2 4NF, to ensure compliance with the Environmental Permitting (England and Wales) Regulations 2016 (as amended). The Application Site is centred on OS Grid reference TQ 75341 69619, WTW glass.stole.grand, lat, lon 575341, 169619, the site location is shown in drawing 1. A boundary plan is shown in drawing 1 & 2. The document will be reviewed on an annual basis, or as a result of but not limited to any of the following circumstances, and updated where necessary:

- A change to an operational process;
- A significant substantiated complaint;
- A significant incident on site;
- A change to any legislation or guidance documents applicable to the waste facility; or Issuance of a varied environmental permit by the EA.

This EMS document is supplemented by the following information/documents (with accompanying plans and drawing)

- Environmental Risk Assessment, describing the environmental risks associated with the activities and the mitigations in place for each of these. – Reference ERA when complete
- Fire Prevention Measures. The Environment Agency objectives of a fire prevention plan is to: (a) minimise the likelihood of a fire occurring; (b) aim for a fire to be extinguished within 4 hours; and (c) minimise the spread of fire within the site and to neighbouring sites.
  The site has prepared a fire prevention plan to be assessed by the environment agency on determination of the environmental permit. Ref FPP-RGE-V1
- Evidence of technical competency confirming the details of the technically competence manager of the facility.
- The Site plan showing the permitted boundary and surrounding area.

The sites waste activities involve treatment of metal waste (both ferrous and non-ferrous), Incoming waste streams are derived from a number of sites and contractors, or RGE Recycling collections. All waste is delivered to the site in appropriate vehicles by suitably registered waste carriers. Once received, the waste will be subject to various treatments or for onward disposal/recovery off-site at other suitably permitted facilities. Waste treatment and transfer activities will take place on impermeable surfaces, all areas are serviced by an oil interceptor.

The objectives of this Environmental Management System are to:

- Identify and minimise the risk of pollution, including those that may arise from the intended operations, maintenance, accidents, non-conformances and complaints
- To identify all site operations and waste management activities
- To ensure environmental risk assessment are conducted and properly managed
- Provide recommendations for the management of potential environmental impacts
- To implement the Waste Hierarchy
- Produce a documented system for use by the Client and the Environment Agency

The scope of work for the production of the Environmental Management System (EMS) has included the following:

- Carry out a review of the environmental setting of the Application Site and surrounding area in order to determine any potentially significant pollution linkages associated with the site in its current condition
- Identification of any environmental impacts resulting from the proposed operations
- Detailing all potential pollutant linkages
- Preparation of documented management system

1.1 Environmental Permit

Table 1 Permitted Activities

Proposed Activities	
Description of Activities	Limits of Activities
R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) R4: Recycling/reclamation of metals and metal compounds	treatment consisting only of sorting, separation, grading, shearing, shredding, baling, granulating and cutting of ferrous metals or alloys and non ferrous metals into different components for recovery. The maximum quantity of non hazardous waste subject to a shredding operation shall not exceed 75 tonnes per day. There shall be no treatment of catalytic converters including decanning, other than sorting and separating from other wastes. There shall be no treatment of lead acid batteries. The maximum quantity of hazardous

	waste stored at the site shall not exceed 50 tonnes at any one time. Wastes shall be stored for no longer than 3 years prior to recovery.

The Permit will not allow any point source emission into surface waters or groundwater. However, under the emissions of substances not controlled by the emission limits rule:

- Liquids may be discharged into a sewer subject to a consent issued by the local water company.
- Liquids may be taken off-site in a tanker for disposal or recovery.
- Clean surface water from roofs, or from areas of the site that are not being used in connection with storing waste, may be discharged directly to surface waters, or to groundwater by seepage through the soil via a soakaway.

1.2 Site Location

The site is located within the footprint of the Royal Eagle Close Industrial Estate, Rochester, Kent. The site is leased by RGE Recycling, RGE Recycling is a privately owned limited company
The National Grid Reference (NGR) for the site is TQ 75341 69619, WTW glass.stole.grand, lat, lon 575341, 169619 the site location is illustrated on the location plan (appendix 3). The site layout is shown on the site plan (appendix 1)

The site is located in a mixed-use area industrial area. The closest residential receptors are situated 694m to the northeast of the site –residents of Castle Street, with further properties to the north and East of the site. The main access to the site is via Royal Eagle Close, this leads straight to the site entrance.

Bedrock formation - Lewes Nodular Chalk Formation, Seaford Chalk Formation And Newhaven Chalk Formation (Undifferentiated)

Age range:	Turonian Age (KT) — Campanian Age (KC)
Status Code	Index Level
Lithological Description:	Chalk
Definition of Lower Boundary:	*none recorded or not applicable*
Definition of Upper Boundary:	*none recorded or not applicable*
Thickness:	*none recorded or not applicable*
Geographical Limits:	*none recorded or not applicable*
Parent Unit:	White Chalk Sub Group (WHCK)

Previous Name(s):	*none recorded or not applicable*

1.3 Report Structure

This report describes the operating techniques that will be implemented at the facility to ensure compliance with the conditions of the Environmental Permit. The report has been drafted to satisfy the requirements of EA Guidance and is divided into the following Sections.

- Section 1 Introduction
- Section 2 Management
- Section 3 Accident Prevention and Management Plan
- Section 4 Operations and Activities
- Section 5 Waste Pre-Acceptance and Acceptance
- Section 6 Emissions and Monitoring
- Section 7 Information

1.4 Site Operating Procedures

RGE Recycling has a number of Site-Specific Operating Procedures (SOPs) that have been included as Appendix 01 documents. These procedures complement this overarching document and should be read in conjunction with the relevant sections.

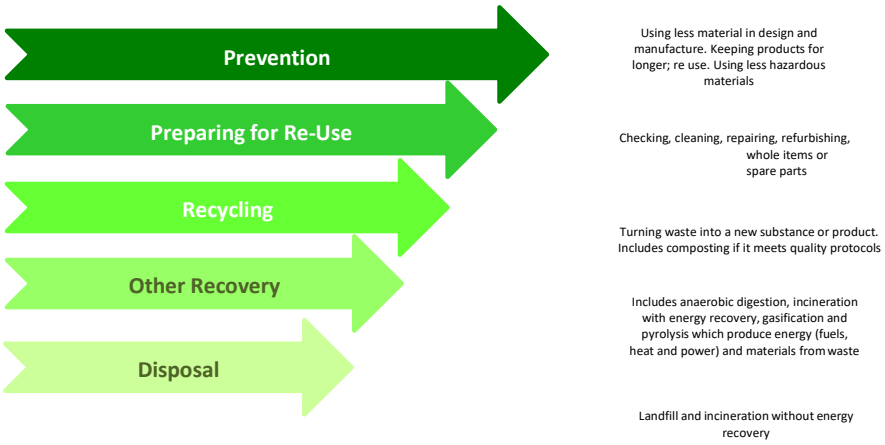
1.5 Document Revision History

Any changes to the EMS will be labelled in chronological order and the date of the change recorded. All records of the changes will be listed in the revision history in Table 1 on page 3 of this EMS (example of table below):

Version	Reason for Revision	Date of Revision	Reviewed By	Approved By
1.0				
1.1				
2.0				
3.0				
4.0				

1.6 Waste Hierarchy

Appropriate measures will be taken against pollution and specifically that the production of waste is avoided. The Operator understands and is committed to the implementation of the waste hierarchy. All measures will be taken to reduce the environmental impact of site operations and to seek options to prevent, minimise and recycle wastes where possible.



The waste hierarchy gives top priority to the prevention of waste in the first instance. It then gives priority to re-use, recycling, and recovery with the least desirable option to dispose of waste to land. As the site mainly accepts and processes high value metals, re-use and recycling is achieved.

The aim of the waste treatment undertaken at the site is to physically treat metal waste, to supply the manufacturing industry with metal materials for production.

2. Management

This bespoke EMS will be implemented on site by RGE Recycling staff which ensures that:

- The risks that the activities pose to the environment are identified;
- The measures that are required to minimise the risks are identified;
- The activities are managed in accordance with the management system;
- Performance against the management system is audited at regular intervals; and
- The EP is complied with.

RGE Recycling Limited is committed to continual improvement, to minimising the impact of the site activities on the environment and to complying with relevant legislation and other requirements to which the company subscribes. This document outlines the operating techniques at the site and demonstrates conformance with the requirements of relevant and published EA Guidance.

2.1 Management Structure and Responsibilities

The Site Manager: INSERT . (who are overseen by the Technically Competent Manager (TCM –INSERT) are responsible for day-to-day operations, compliance with the EMS and the EP. All site employees

are to report to the TCM and are closely involved in all site matters and for first-line risk management at the site.

Whenever the site is open to receive or despatch wastes, or to carry out any of the waste management operations, it is supervised by at least one member of staff who is suitably trained and fully conversant with the requirements of the environmental permit regarding:

- Waste acceptance and control procedures;
- Operational controls;
- Pollution prevention controls
- Maintenance;
- Record-keeping;
- Emergency action plans; and
- Notifications to the EA

2.2 Technical Competence and Training

The site will be managed by sufficiently trained staff, who are competent to operate the site. RGE Recycling Limited training procedure, record sheet and matrix are included as Appendix 03 Training Matrix. A fully trained member of staff is on site at all times during waste acceptance hours, in order to provide supervision for waste acceptance. This staff member is fully conversant with the waste acceptance procedure, EP and contents of this EMS.

RGE Recycling EMS and training procedures ensure the following:

- All staff have clearly defined roles and responsibilities;
- Records are maintained of the skills required for each post;
- Records are maintained of the training and relevant qualifications undertaken by staff to meet the requirement of each post; and
- Operations are governed by standard operating procedures and instructions.

Operations at the site will be under the overall control of a technically competent manager (TCM) who will hold the relevant Operator Competence Certificate under the CIWM (WAMITAB) scheme. The relevant qualification applicable to this activity is either:

CIWM (WAMITAB) Level 4 High Risk Operator Competence For Managing Physical & Chemical Treatment of Hazardous Waste, or;
CIWM (WAMITAB) Level 4 Medium Risk Operator Competence For Non-Hazardous Waste Treatment and Transfer **(but only when combined with);**
CIWM (WAMITAB) Level 4 Medium Risk Operator Competence For Physical Treatment

The site currently employs a trainee TCM who will demonstrate technical competence by achieving MROC1 Level 4 Medium Risk Operator Competence for Non-Hazardous Waste Treatment and Transfer.

CIWM (WAMITAB) Level 4 Medium Risk Operator Competence for Non-Hazardous Waste Treatment and Transfer	MROC1	Treatment - Non - Hazardous	TMNH

An assessment of staff training needs is carried out to identify the posts for which specific environmental awareness training is needed, and to determine the scope and level of such training. The assessment of training needs is reviewed on an annual basis with records retained.

The training programme ensures that all staff are aware of the following:

- Regulatory implications of the environmental permit for the site and their specific work activity;
- All potential environmental effects from operations under normal and abnormal circumstances;
- Incident management;
- The need to report deviations from the EP; and
- Prevention of accidental emissions and the action to be taken should accidental emissions occur.

All operatives will receive thorough training on waste identification, acceptance procedures and classification. This training will be conducted at the start of employment, in response to any non-conformances, incidents or significant changes in operations, and annually; and
All members of the management team including those responsible for overseeing site activities receive thorough training with regards to the conditions of the EP and their resultant duties. Management must also become conversant with and annually refresh their knowledge of this EMS.
Hard copies of this EMS will be available in the site office for all staff members to view as needed. The table below shows the training cycle for the site:

All new site staff and contractors (and existing site staff and contractors when the plan is introduced on site)	To be trained on all site procedures
Existing staff and regular sub-contractors	To be trained on policies and procedures every 12 months (on the nearest practicable date to the 1st of the month
Site Manager and TCM to identify areas for refresher or new training	Every 3 months based on review of issues (or as soon as practicable after new requirements, new plant, equipment, etc.)
Site TCM and Site Manager	Annual review each year, or earlier if in a response to an incident or change in operational procedures

2.3 Site Security

The site benefits from a continuous presence of staff during operational hours, currently between 7am to 5pm Monday to Friday, and Saturday between the hours of 8am to 13:00pm. The site will operate Sundays and bank holidays if required on an ad hoc basis.
Security features on site includes:

- 2m high perimeter fencing surrounding the site;
- Access gates which are equipped with a highly secure locking mechanism;
- CCTV system coverage; fully monitored by an alarm receiving center.
- Fully integrated intruder alarm system across site
- SIA Accredited. Keyholding – security patrols & alarm response.

All visitors and contractors are required to sign in and are escorted by a member of staff. CCTV is accessible to site operatives throughout the working day, and remotely viewable on mobile devices at all times. If a breach in security is detected inside of operational hours, site operatives would contact the Site Manager or their deputy and the emergency services as appropriate. Out of operational hours CCTV is monitored via a remote monitoring station, should a breach be identified the monitoring station would contact the mobile patrol, police, and the site manager. The same procedure would be followed if the integrated intruder alarm system was to activate.
All security measures on site are inspected at the commencement of every working day by the site TCM or Manager to ensure their continued integrity. Any defects or damages which compromise the integrity of the enclosure will be made secure by temporary repair by the end of the working day. Permanent repairs will be made within a maximum of 5 days. The monitoring station would report to the site manager any defective CCTV.
In the event of a breach of security at the site, the cause will be investigated, and appropriate mitigation measures implemented, such as repositioning of CCTV cameras, repair of security infrastructure, and/or additional deterrents. This is recorded in the site diary. Records maintained include inspections and maintenance of perimeter fencing and gates, doors and locks, breaches of security, investigations and actions taken.

2.4 Display of Environmental Permit

A copy of the EP will be kept available in the Site Office for reference by all staff and contractors whose work may have an impact on the environment.

2.5 Permit Surrender

To assist in a permit surrender, records will be maintained to demonstrate how the land beneath the site has been protected between the date of EP issue and the end of operations which will be referenced from a Baseline Site Condition Report (BSCR). Records to be maintained will include:

- Maintenance of surfacing;
- Maintenance of drainage system; and
- Actions taken to clean up incidents and spillages.
- Site Diary Logs

- EA CAR Reports
- Site inventory showing where asbestos waste has been stored
- Significant findings from audits
- Tonnage logs
- Site Photos (before and after decommissioning)

2.6 Managing Documentation and Records

Controls are in place to ensure that all documents are issued, revised and maintained in a consistent fashion. The documents that are included within this scope of the controls are as follows:

- Environmental Permit Issued
- Environmental Risk Assessment
- A release of emissions to air, water and land
- Duty of Care
- Policies;
- Schedule 5 Reporting
- Responsibilities;
- Targets;
- Maintenance records;
- Operational Procedures;
- Monitoring records;
- Results of audits;
- Results of reviews;
- Complaints and incident records; and
- Training records.

Records will be made and kept up to date on a daily basis to reflect deliveries, on-site acceptance and dispatches. All records relating to waste acceptance will be recorded, maintained, legible and made readily available on site and kept for a minimum of 5 years after the waste has been removed off site

2.7 Daily Site Checks

The Site Manager or TCM will maintain the site diary and complete the site diary on a daily basis at the end of each day, and the daily checklist.

The site diary checklist will record the following checks:

- Date
- Weather conditions
- Wind direction
- Wind speed
- Condition of site perimeter/boundary
- Fuel Tanks
- Fire prevention measures implemented
- Site noticeboard in good repair
- Waste stored on site is compliant

- Non-compliant waste on site is in quarantine
- Waste volumes on site compliant
- Waste quantities on site compliant
- Condition of impermeable surfaces,
- Condition of site drainage systems
- Litter not outside of site boundary
- Dust levels at acceptable levels
- Odours on site at acceptable levels,
- Waste is fully secure (no spillages)
- Noise levels at acceptable levels
- Site free from pests/vermin
- Site infrastructure in good repair
- TCM attendance
- Site equipment/plant in good repair
- Compliance with duty of care documentation
- Spill kits in place
- No signs of run off from wastes
- operating hours start and end

The site manager or TCM will also record: General site activities, maintenance undertaken, breakdowns, emergencies, complaints, environmental problems, and non-compliance details.

Alongside completion of the site diary, the Site Manager will update the tonnage logs which records daily waste arriving and leaving the site. All waste will arrive at the site with the requisite documentation as per section 5 of this EMS (Duty of Care)

2.8 Non - RGE Recycling contractors Working at the Site

The risk of non-conformance and non-compliance with site procedures required under the EMS is managed by requiring all contractors and/or their employers to:

- Be subject to Permission to Work procedures
- Undergo induction training
- Sign the permission to work form that they have understood and will comply with required site procedures.

All contractors must satisfy and evidence the permission to work requirements for employers' and public liability insurance.

RGE Recycling has implemented permit to work systems, and an approved contractor database to ensure they are able to adequately monitor all contractor activity to ensure compliance.

2.9 Reporting Non-Compliance and Taking Corrective Action

Appropriate corrective action will be taken in response to problems identified at the site. Non-compliances detected on site will be reported, investigated and rectified and failures and weaknesses will be prevented. Staff will maintain awareness of non-compliances in the following areas:

- Actual or potential non-compliance with conditions of the environmental permit;
- System failure discovered at internal or external audit;
- Suppliers or subcontractors breaking the agreed operating rules;
- Incidents, accidents, and emergencies;
- Malfunction, breakdown or failure of plant;
- Other operational system failure; and
- Complaints and the action taken in response such as;
  - Obtaining additional information on the nature and extent of a non-conformance;
  - Discussing and testing alternative solutions;
  - Modifying procedures and responsibilities;
  - Seeking approval for additional resources and training; and
  - Contacting suppliers and contractors (as applicable).

2.10 Staff Induction

All staff are subject to a full induction prior to work commencing, this is to ensure regulatory compliance, and operational efficiency. It familiarises staff with health and safety protocols, site-specific procedures, and legal responsibilities while promoting environmental protection and reducing risks of non-compliance. By covering waste handling, PPE requirements, and emergency procedures, the induction ensures staff can work safely, prevent environmental harm, and maintain smooth operations, all while aligning with RGE Recycling values and goals.

2.11 Insurance

The site will be covered by insurance for:

• Employers' liability;
• Public Liability; and
• Material Damage.

The Site Managers and Directors will be responsible for ensuring that all conditions of these policies are adhered to

2.12 Complaints

The complaints procedure and record form are included as Appendix 06 -Complaints procedure.

2.13 Auditing and Legal Compliance

There will be a formalised internal auditing procedures to ensure the facility is audited against its EMS and permit. The Audit will build upon the site diary checks and provide a more in-depth compliance inspection. The audit is included in Appendix 07 – Internal Audit.

2.14 Monitoring , Measuring and Reviewing Environmental Performance

The formalised management structure reviews environmental performance, and ensure any necessary improvements and/or corrective actions are taken. Review meetings will be held 3 times per year.

2.15 Operational Control and Preventative Maintenance

RGE Recycling ensures effective control of site operations, the use of approved suppliers and contract services, the maintenance of operational equipment, and the calibration of any monitoring equipment. RGE Recycling acknowledges that poor maintenance can be the cause of environmental incidents. As the potential of failure of plant and infrastructure (e.g. Impermeable surfaces, seals and bunds, filters, containers etc.) at the site could lead to fugitive emissions to the environment, RGE Recycling Limited carry out a programme of Planned Preventative Maintenance (PPM). All items of plant and equipment are regularly inspected and maintained in accordance with the manufacturer's specifications.

3 Emergency Response

RGE Recycling Limited recognises the importance of the prevention of accidents that may have environmental consequences and that it is crucial to limit those consequences. RGE Recycling have developed a system to identify, assess and minimise the environmental risks and hazards of accidents and their consequences which forms part of its emergency procedures.

The Emergency Procedures will be implemented and maintained at the facility to ensure that the site and staff are fully prepared for any such incidents. The emergency response will be reviewed at least annually, or as soon as practicable after an incident, or in the event of a permit variation or change in operational process with changes made accordingly to minimise the risk of occurrence. Appendix 13 details how the site will respond to largescale spillages

The following section has been prepared in accordance with EPR Guidance EA Accident Prevention and Management Plan guidance. The following Accident Prevention and Management Plan describes the techniques that will be implemented to minimise the risks posed to the environment. Activities affecting the health and safety (H&S) of operatives, contractors and visitors will be separately managed in compliance with H&S regulation and company H&S Policy.

3.1 Hazard Identification and Contingency Plan

The following potential hazards have been identified:

- Unauthorised waste;
- Fire;
- Loss of containment - spillage and leakage;
- Security and vandalism;
- Flooding;
- Breakdowns; and

• Enforced shutdowns.

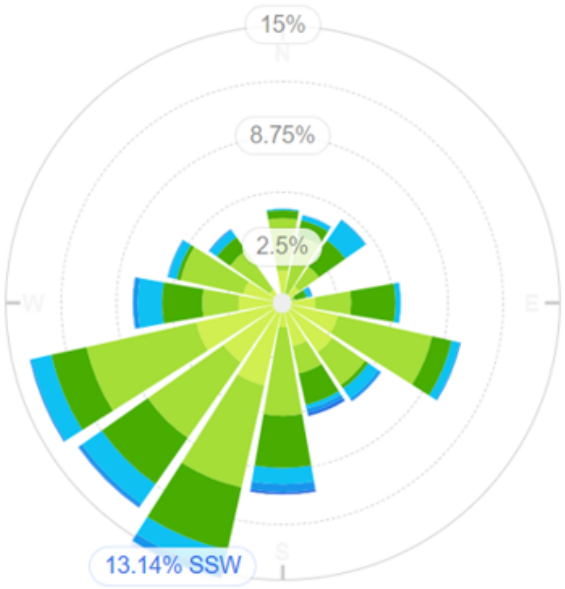
The following sections summarise the methodology necessary to minimise the potential causes and consequences of these hazards (Table 3.1 Hazards, Pathways and Risk Management) to operationalise the Accident Prevention and Management Plan. This and the Accident Prevention and Management Plan, of which it forms a part, are standing items for review at all site management meetings and are reviewed whenever an accident or near-miss is recorded. For completeness, Appendix 8 contains the Environmental Risk Assessment.

Classification of Consequence		
Classification	**Definition**	**Examples**
Severe	Short term (acute) risk to human health likely to result in 'significant harm;' as defined by the Environmental Protection Act 1990, Part IIA. Short term risk if pollution (note: Water Resources Act does not contain provision for consideration of the significance of pollution) of sensitive water resource. A short-term risk to a particular ecosystem, or organism forming part of such an ecosystem. (note: the definition of ecological systems with the DEFRA Contaminated Land Statutory Guidance 2012)	High concentration s of cyanide on the surface of an informal recreation area. Major spillage of contaminants from site to a controlled water. Explosion, causing building collapse (can also equate to short term human health risk if buildings are occupied).
Medium	Chronic damage to human health ('significant harm as defined DEFRA Contaminated Land Statutory Guidance 2012) Pollution of sensitive water resources. A significant change in a particular ecosystem, or organism forming part of such ecosystem. (note: the definition of ecological systems with the DEFRA Contaminated Land Statutory Guidance 2012)	Concentration of contaminant from the site exceeds the generic or site specific assessment criteria. Leaching of contaminants from a site to a principal or secondary aquifer. Death of species within a designated nature reserve.
Mild	Pollution of non-sensitive water resources. Significant damage to buildings, structures, and crops. ('Significant harm' as defined in DEFRA Contaminated Land Statutory Guidance 2012 and EPA 1990 Part IIA). Damage to sensitive buildings/structures or the environment.	Pollution if non-classified groundwater. Damage to building, rendering it unsafe to occupy (e.g. foundation damage resulting in instability).
Minor	Harm, although not necessarily significant harm, which may result in a financial loss or expenditure to resolve. Non-permanent health effects to human health (easily prevented by means such a personal protective clothing etc.). Easily repairable effects of damage to buildings/structures	The presence of contaminants at such concentration is that protective equipment is required during the site works. The loss of plants in landscaping scheme. Discolouration of concrete.

Classification of Probability	
Classification	**Definition**
High Likelihood	There is a pollution linkage and an event which would either appear very likely in the short term and almost inevitable over the long term, or, there is evidence at the receptor of harm or pollution.
Likely	There is a pollution linkage and all the elements are present in the right place which means that it is probable that an event will occur. Circumstances are such that an event is not inevitable, but possible in the short term and likely to occur over the long term.
Low Likelihood	There is pollution linkage and circumstances are possible under which an event could occur. However, it is by no means certain that even over a longer period such event would take place and is less likely in the shorter term.
Unlikely	There is a pollution linkage but circumstances are such that it is improbable that an event would occur even in the very long term.

		Consequence			
		Severe	**Medium**	**Mild**	**Minor**
Probability	High Likelihood	Very High Risk	High Risk	Moderate Risk	Moderate/Low risk
	Likely	High Risk	Moderate Risk	Moderate to low Risk	Low Risk
	Low Likelihood	Moderate Risk	Moderate/Low Risk	Low Risk	Very low Risk
	Unlikely	Moderate/Low Risk	Low Risk	Very Low Risk	Very Low Risk

Windrose



A Windrose providing the frequency of wind speed and direction from the Gravesend-Broadness Meteorological Station for the period of 2019 is presented. ***Location: 55.904, -167.311, Altitude: 41m above mean sea level Station type: Automatic.*** The Windrose shows that the most prominent wind direction is from the Southwest to the Northeast. Winds from the north, east and west are relatively infrequent. Smoke contains a multitude of combustion products including irritants and asphyxiants which are toxic. These toxic pollutants can impact anyone within 1km of the site and in certain circumstances will have an impact on public health at greater distances than 1km. Smoke will have a significant effect on human health, as detailed within the research studies. The fire and smoke would affect the immediate businesses, local houses and the wider industrial and residential areas.

3.2 Emergency Contact Details

In the event of an emergency or accident, the Table 3-2 below provides the relevant details:

Table 3-2 Emergency Contact Details (24/7)

Position	Name	Contact Number
Director	Ryan Eastwood	07761 512487
Director	Maria Eastwood	07726569389
Site Manager	John Clark	07931594382

3.3 Contingency Plans and Procedures

The site has contingency plans in place to ensure that the following is achieved:

- Compliance with all EP conditions and operating procedures during maintenance or shutdown at the site;
- No exceedance of limits in the EP and that appropriate measures for storing and handling waste continue to be applied; and
- Cessation of waste acceptance unless there is a clearly defined method of recovery and enough permitted capacity on site

The sites contingency plans are included in Appendix 9 – Contingency Plan

4 Operations and Activities

4.1 Permitted Activities

The permitted activities are set out in the table below:

Permitted Activities	
Description of Activities	Limits of Activities
R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) R4: Recycling/reclamation of metals and metal compounds AMEND once reviewed – include transfer of UPVC	treatment consisting only of sorting, separation, grading, shearing, shredding, baling, granulating and cutting of ferrous metals or alloys and non ferrous metals into different components for recovery. The maximum quantity of non hazardous waste subject to a shredding operation shall not exceed 75 tonnes per day. There shall be no treatment of catalytic converters including decanning, other than sorting and separating from other wastes. There shall be no treatment of lead acid batteries. The maximum quantity of hazardous waste stored at the site shall not exceed 50 tonnes at any one time. Wastes shall be stored for no longer than 3 years prior to recovery.

4.2 Waste Storage Plan:

The site is permitted to accept the following waste types:

12 01 01 – ferrous metal filings and turnings
12 01 03 – non-ferrous metal filings and turnings

15 01 04 – metallic packaging

16 01 17 – ferrous metal
16 01 18 – non-ferrous metal
16 01 21* – hazardous components other than those mentioned in 16 01 07 to 16 01 11 and 16 01 13 and 16 01 14
16 01 22 – components not otherwise specified
16 06 01* – lead batteries

17 04 01 – copper, bronze, brass
17 04 02 – aluminium
17 04 03 – lead
17 04 04 – zinc
17 04 05 – iron and steel
17 04 06 – tin
17 04 11 – cables other than those mentioned in 17 04 10
17 09 04 – mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03

19 01 02 – ferrous materials removed from bottom ash
19 10 01 – iron and steel waste
19 10 02 – non-ferrous waste
19 12 03 – non-ferrous metal
19 12 04 – plastic and rubber

20 01 33* – batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries
20 01 40 – metals

Storage Conditions

- *Uncontaminated ferrous metal wastes or alloys and uncontaminated non-ferrous metal wastes shall be stored on hard standing or an impermeable surface. All other wastes shall be stored on an impermeable surface with sealed drainage system.*

The entire site is serviced by impermeable surface. In the event of a major spillage or fire, a dynamic sealed drainage system is in place, this can be achieved by sealing the interceptor and therefor tanking the site.

- *Lead acid batteries shall be stored upright in containers with the electrical connectors pointing upwards. The containers shall be impermeable with an acid-resistant base and, unless stored under weatherproof covering, a lid to prevent ingress of water.*

- *Catalytic converters will be stored in a manner that prevents the metal casing being damaged or pierced. If the metal casing becomes damaged the catalytic converter should be either double bagged or wrapped in a minimum of 400 gauge polyethylene.*

Waste Table						
Material / EWC	Max Volume	Size Of Pile or Container W x L x H	Location on Site – see insert below	Max Time on Site	Combustible Y/N	Fraction Range
Scrap Metal	240 M3	8X10X3	Storage area 1	90 Days	Yes	Above 150 mm
Scrap Metal	240 M3	8X10X3	Storage area 2	90 Days	Yes	Above 150 mm
Scrap Metal	240 M3	8X10X3	Storage area 3	90 Days	Yes	Above 150 mm
Scrap Metal, Wood, General (waste generated on site)	240 M3	8X10X4	Storage area 4	90 Days	Yes	Above 150 mm
UPVC	240 M3	8X10X3	Storage area 5	90 Days	Yes	Above 150 mm
Quarantine Area	240 M3	8X10X4	Storage area 6	90 Days	Yes	Above 150 mm

The site has no plans to accept catalytic convertors.

Fire Prevention limitations can be seen below:

The site will be permitted to store the following quantities:

Table D - Permitted waste quantities	
Annually	No more than 75,000 Tonnes
Any one time	1200 M3, as per fire prevention plan restrictions.
Duration	No current restriction on duration of storage

4.3 Site Operations & Activities

The activities that can be carried out at the site as defined under Annex II of the Waste Framework Directive can be summarised as follows:

- R4: Recycling/reclamation of metals and metal compounds (all metals in RGE Recycling operations are ferrous and non-ferrous);
- R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).

Activities on site currently consist of the receipt, unloading, manual sorting, storage, shearing, and bailing of non-ferrous metal wastes for recovery. Loads of mixed ferrous and nonferrous will be accepted on site, these loads will be manually sorted into individual waste streams for recovery – this will be both hand sorted and sorted with a material handler.

- **Sorting** - Incoming loads are mostly single waste stream from either pre-treatment or manufacturing processes. Sorting is only required for mixed loads accepted on site; this is carried out manually with the material handler, the target materials are high value ferrous and non- ferrous metals. Any residues of the sorting process will be dispatched for further treatment of site.
- **Shearing -** This takes place in the yard with an attachment on the material handler, on fed into the static LeFort shear. This treatment process is carried out to reduce the particulate size of ferrous metals to facilitate handling and transport.
- **Bailing** – Ferrous and non-ferrous metals that has been pre-sheared is then compressed into bails to facilitate handling, transport, and the in-feed specifications for individual client foundries.
- **Transfer of UPVC -** The site will accept and transfer waste uPVC materials for transfer only; no treatment, processing, or recovery activities will be undertaken on this waste stream. All uPVC accepted on site will be managed in accordance with the relevant duty of care requirements and stored securely to prevent damage or contamination prior to transfer. This material is classified under the European Waste Catalogue (EWC) code 17 09 04 – Mixed construction and demolition wastes.

Residual Waste: Non-recyclable materials and residual waste are disposed of in an environmentally responsible manner, often through incineration with energy recovery, and disposal where energy recovery is not possible.

4.4 Hours of Operation

The site operates from 7am to 5pm Monday to Friday, and Saturday between the hours of 8am to 13:00pm

4.5 Site Infrastructure and Equipment

4.5.1 Site Identification Board

A site identification board which is easily readable from outside the entrance during hours of daylight, will be displayed at the main site entrance. The identification board will be inspected at least once per week. In the event of damage or defect that significantly affects the legibility of the board, it will be repaired or replaced within five working days, or to a timescale agreed with the EA. Any defects and repairs will be recorded in the site diary. The board will display the following information:

- Site name and address;
- Permit holder;
- Permit number
- A statement that the site is regulated and permitted by the Environment Agency
- Emergency contact name and telephone number;
- EA national telephone numbers; and
- Days and hours site is open to receive waste.

4.5.2 Plant and Equipment

The following Plant and Equipment is held/installed on site

Plant & Equipment		
Item	**Quantity**	**Function**
Fuchs (material Handler)	350S5	Waste handling
Fuchs (material Handler)	331	Waste handling
Cat (ForkLift)	5f30c33	Waste handling
Mitsubishi (forklift)	fd25mc-t	Waste handling
Lefort - shear	Mobil 500	Waste Treatment
Cropper	200	Waste Treatment
Granulator	Type C-MD	Waste Treatment
Ferrous Shredder	GAZ 62	Waste Treatment
Air Compressor	bs5169 111E	Maintenance

All items of plant and equipment used on site are maintained in accordance with manufacturer's recommendations and/or specifications referred to in this document.

5.0 Duty of Care: Waste Pre-Acceptance and Acceptance

Waste pre-acceptance, acceptance and tracking policies and procedures ensure that RGE Recycling Limited is fulfilling its Duty of Care responsibilities.
Waste arriving at the site will be either pre booked or unannounced.

5.1 Duty of Care: Waste Pre-Acceptance

All incoming waste loads are booked in advance (where possible), through the site manager who arranges the date and time of delivery to the site. The site manager is responsible for undertaking the waste pre-acceptance procedures. The waste pre-acceptance procedures follow a risk-based approach considering:

- The source and nature of the waste;
- Potential risks to process safety, occupational safety and the environment (for example from emissions); and
- Knowledge about the previous waste holder(s). The objective of the waste pre-acceptance procedure is to evaluate customer information at the enquiry stage to determine whether the waste could be accepted at the site.

When waste arrives at the site announced, the site manager will first ensure that the site has capacity to safely accept, store or process the incoming material. The material will then be subject to a visual inspection, this is to ensure that the load does not contain non-complaint waste types and the load is as described. Following a visual inspection the driver will be directed to the weighbridge to ensure that the waste transfer note, or consignment note is accurate and completed in full. Following document inspection, the operator will record the gross weight of the vehicle and direct the vehicle to the relevant waste reception area to unload the waste.

Waste Inspection

Non- Ferrous:

- Identification: Check the waste to verify its type (e.g., copper, aluminum, lead, zinc) and ensure it matches the description provided in the documentation.
- XRF Analysis: if required to determine the composition/metal types.
- Condition: Assess the physical condition of the waste. Look for signs of contamination, such as oil, grease, or other substances that might be mixed with the non-ferrous metals.
- Mixed Materials: Ensure that non-ferrous waste is not mixed with ferrous metals or other contaminants.
- Hazardous Substances: Identify and segregate any hazardous substances found within the non-ferrous waste, such as batteries or components containing toxic metals like lead or cadmium.

Ferrous:

- Identification: Confirm that the ferrous waste matches the description provided in the documentation. Common ferrous wastes include iron, steel, and their alloys.
- Condition: Assess the physical condition of the waste. Look for signs of contamination, such as oil, grease, or other substances mixed with the ferrous metals.
- Mixed Materials: Ensure that ferrous waste is not mixed with non-ferrous metals or other contaminants.
- Hazardous Substances: Identify and segregate any hazardous substances found within the ferrous waste, such as components containing toxic materials or hazardous residues.

The waste producer/holder must provide the following waste characterisation information for each new waste stream proposed acceptance onto the site:

- Waste source and origin;
- The process producing the waste (including a description of the process and characteristics of the waste types used to comprise the batch of material);
- The waste treatment applied;
- The appearance of the waste (including smell, colour, consistency and physical form); and
- Analysis and determination of waste code in accordance with WM3 (where appropriate).

5.2 Duty of Care: Waste Acceptance

The site will operate from 7am to 5pm Monday to Friday, and Saturday between the hours of 8am to 13:00pm. with no operations intending to take place on Sundays or bank holidays.

All waste brought to site is inspected in accordance with the following procedure:

- All waste carriers entering the site must report to the weighbridge office where the paperwork is checked and verified (Waste Transfer Notes/consignment notes). If any paperwork is missing the site manager or TCM will be informed immediately;
- The delivery vehicle driver is asked to park in a designated area subject to acceptance of the paperwork. The vehicle is then directed to the waste unloading area for a visual waste inspection and is then unloaded by RGE Recycling trained staff, or tipped by the driver.
- Once the load has been booked onto the system, the incoming load and packages are visually inspected for quality, damage and any discrepancies to check that the material conforms with the EWC code and description of the material on the waste transfer documents. Any discrepancies will be reported to the Site Manager or TCM. The material is classified by visual inspection.
- Wastes are only accepted if the description in the accompanying documentation is in accordance with the EP and that onsite inspection confirms waste is consistent with the description provided;
- Any non-conforming waste is immediately (a) Rejected and removed by the carrier that bought the waste in, or, (b) quarantined and wrapped with red and white tape.
- A record is kept of all deliveries and refusals. The waste producer and the EA will be notified of any non-conformance. Records of non-compliant waste received at the site will include details on:
- The quantity;
- Characteristics;
- Origin;
- Delivery date and time; and
- The identity of the producer and carrier. The site's booking system will ensure that wastes are not accepted unless the site is adequately resourced to receive the waste. Any rejected loads will be reported to the EA.

5.3 Waste Transfer Notes and Consignment Notes

All Non-Hazardous Waste must have a valid Controlled Waste Transfer Note that is completed in full. Where a waste entering the site is hazardous such as lead acid batteries or cable, a consignment note will be required >>>>>

Duty of care: waste transfer note

Keep this page and copy it for future use. Please write as clearly as possible.

Section A – Description of waste

A1 Description of the waste being transferred

List of Waste Regulations code(s)

A2 How is the waste contained?

Loose ☐ Sacks ☐ Skip ☐ Drum ☐

Other ☐

A3 How much waste? For example, number of sacks, weight

Section B – Current holder of the waste – Transferor

By signing in Section D below I confirm that I have fulfilled my duty to apply the waste hierarchy as required by Regulation 12 of the Waste (England and Wales) Regulations 2011 Yes ☐

B1 Full name

Company name and address

Postcode SIC code (2007)

B2 Name of your unitary authority or council

B3 Are you:

The producer of the waste? ☐

The importer of the waste? ☐

The local authority? ☐

The holder of an environmental permit? ☐

Permit number

Issued by

Registered waste exemption? ☐

Details, including registration number

A registered waste carrier, broker or dealer? ☐

Registration number

Details (are you a carrier, broker or dealer?)

Section C – Person collecting the waste – Transferee

C1 Full name

Company name and address

Postcode

C2 Are you:

The local authority? ☐

C3 Are you:

The holder of an environmental permit? ☐

Permit number

Issued by

Registered waste exemption? ☐

Details, including registration number

A registered waste carrier, broker or dealer? ☐

Registration number

Details (are you a carrier, broker or dealer?)

Section D – The transfer

D1 Address of transfer or collection point

Postcode

Date of transfer (DD/MM/YYYY)

D2 Broker or dealer who arranged this transfer (if applicable)

Postcode

Registration number

Time(s)

Transferor's signature

Name

Representing

Transferee's signature

Name

Representing

WMC2A Version 3, August 2011 page 1 of 1

Form HWCN01v112

The Hazardous Waste Regulations 2005: Consignment Note

Environment Agency

PRODUCER'S/HOLDER'S/CONSIGNOR'S COPY (Delete as appropriate)

PART A Notification details

1 Consignment note code: /

2 The waste described below is to be removed from (name, address, postcode, telephone, e-mail, facsimile):

3 The waste will be taken to (name, address and postcode):

4 The waste producer was (if different from 2) (name, address, postcode, telephone, e-mail, facsimile):

PART B Description of the waste

If continuation sheet used, tick here ☐

1 The process giving rise to the waste(s) was:

2 SIC (2007) for the process giving rise to the waste: . /

3 WASTE DETAILS (where more than one waste type is collected all of the information given below must be completed for each EWC identified)

Description of waste	List of wastes (EWC code)(6 digits)	Quantity (kg)	The chemical/biological components in the waste and their concentrations are: Component	Concentration (% or mg/kg)	Physical form (gas, liquid, solid, powder, sludge or mixed)	Hazard code(s)	Container type, number and size

The information given below is to be completed for each EWC identified

EWC code	UN identification number(s)	Proper shipping name(s)	UN class(es)	Packing group(s)	Special handling requirements

PART C Carrier's certificate

(If more than one carrier is used, please attach schedule for subsequent carriers. If schedule of carriers is attached tick here. ☐)

I certify that I today collected the consignment and that the details in A2, A3 and B3 are correct and I have been advised of any specific handling requirements.

Where this note comprises part of a multiple collection the round number and collection number are: /

1 Carrier name:

On behalf of (name, address, postcode, telephone, e-mail, facsimile):

2 Carrier registration no./reason for exemption:

3 Vehicle registration no. (or mode of transport, if not road):

Signature

Date D D M M Y Y Y Y Time H H M M

PART D Consignor's certificate

I certify that the information in A, B and C has been completed and is correct, that the carrier is registered or exempt and was advised of the appropriate precautionary measures. All of the waste is packaged and labelled correctly and the carrier has been advised of any special handling requirements.

I confirm that I have fulfilled my duty to apply the waste hierarchy as required by Regulation 12 of the Waste (England and Wales) Regulations 2011.

1 Consignor name:

On behalf of (name, address, postcode, telephone, e-mail, facsimile):

Signature

Date D D M M Y Y Y Y Time H H M M

PART E Consignee's certificate (where more than one waste type is collected all of the information given below must be completed for each EWC)

Individual EWC code(s) received	Quantity of each EWC code received (kg)	EWC code accepted/rejected	Waste management operation (R or D code)

1 I received this waste at the address given in A3 on: Date D D M M Y Y Y Y Time H H M M

2 Vehicle registration no. (or mode of transport if not road):

3 Where waste is rejected please provide details:

Name:

On behalf of (name, address, postcode, telephone, e-mail, facsimile):

I certify that waste permit/exempt waste operation number:

authorises the management of the waste described in B at the address given in A3.

Where the consignment forms part of a multiple collection, as identified in Part C, I certify that the total number of consignments forming the collection are:

Signature

Date D D M M Y Y Y Y Time H H M M

5.4 Duty of Care: Quarantine Procedure

The quarantine and rejection procedures ensure that all non-conforming waste is removed from the site and that the waste producer and carrier are informed so that appropriate action can be taken to prevent recurrence. Non-conforming waste will be identified by Site Operatives on inspection of documentation or the load itself.

If unauthorised waste is identified, it will be moved to the designated quarantine area and marked with red and white tape. The Site Manager will notify the supplier of non-conforming material within 24 hours of receipt, and where the material is not permitted, arrangements will be made to return the material to the supplier at the supplier's expense. The waste within this area will be at least 6 meters from other waste types

5.5 Waste Dispatch

All wastes leaving the site will be subject to assessment and classification to ensure a duty of care has been fulfilled. RGE Recycling understand that it's their responsibility as the holder of the waste to ensure wastes are assessed and classified in accordance with WM3 Technical Guidance.

The order of precedence will be followed when classifying wastes:

1.) Check if the waste needs to be classified

2.) Identify the code or codes that may apply to the waste
The first step is to look at Chapters 01 to 12 and 17 to 20. These chapters refer specifically to an industry process or business activity that has produced the waste, and to municipal waste. A business will typically have municipal wastes (chapter 20) and wastes from one or more processes or activities. A number of chapters will normally need to be considered. If no appropriate entry is found in chapters 01 to 12 or 17 to 20, then you should check chapters 13, 14 and 15 to see if the waste is listed there. '99' codes from chapters 13, 14 and 15 may be considered. These chapters contain subchapters and codes for: waste oils and fuels waste solvents and refrigerants waste packaging, absorbents, filter materials, wiping cloths and protective clothing. If there is no appropriate code or codes in chapters 01 to 15 or 17 to 20, the next step is to look in chapter 16. '99' codes from chapters 16 may be considered. Chapter 16 contains sub-chapters and codes for many general wastes such as: vehicles electronic equipment and batteries chemicals aqueous liquid wastes. Occasionally an appropriate code or codes may not be identified in steps 1 to 3. This is unusual, so we recommend you review steps 1 to 3 before proceeding. If you're unsure seek advice. If a waste is from one of the industry processes 01 to 12 and 17 to 20, you can now use the 99 code that you were not able to use in Step 1. An example of a waste that is coded 99 is a separate fraction of municipal hygiene wastes (20 01 99). You should still use the 'most appropriate' code, so shouldn't use a 99 code if a more suitable alternative is available in another chapter of the LoW. For example amalgam waste from veterinary healthcare care should be coded 18 01 10*, even though that code relates to human healthcare, as it's clearly suitable. You now need to look at the 'entry type' to work out what assessment is needed to select the correct code. In the list of waste there are four types of entry, those coloured in: red and labelled AH; they are known as 'absolute hazardous' wastes. black and labelled AN; they are known as 'absolute non-hazardous' wastes. blue and labelled MH; they are known as 'mirror hazardous' entries. green

and labelled MN; they are known as ‘mirror non-hazardous’ entries The six-digit codes in the LoW that are hazardous wastes have an asterisk (*) next to them.

3.) identify the assessment needed to select the correct code Steps to assess the waste
4.) determine the chemical composition of the waste
5.) identify if the substances in the waste are ’hazardous substances’ or ’Persistent Organic Pollutants’
6.) assess the hazardous properties of the waste
7.) assign the classification code and describe the classification code

6.0 Emissions and Monitoring

The site is constructed and is operated so that there are no polluting emissions to air, surface water, groundwater or land, apart from uncontaminated surface water run off which has not come into contact with waste.

6.1 Drainage and Chemical Containment

Drainage

The site is operated in such a way as to prevent emissions to surface water and groundwater. Waste acceptance and storage areas of the site are engineered to be impermeable, all areas of the site are served by an oil interceptor.
The site has various drainage inspection points (gullies) all drainage infrastructure can be seen on the site layout plan.

Site surfacing and secondary containment areas are inspected daily for defects to ensure the continued integrity of the surface. Any required repairs will be given a temporary solution immediately, and a permanent repair will be fitted within 5 working days. Site surfacing will be maintained as required to ensure surfacing is fit for purpose. The surface will be maintained such that the working surface will:

- Remain even;
- Not be subject to settlement of differential settlement;
- Not be subject to rutting by vehicles even when wet; and
- Have sufficient durability to allow cleaning, for example, by scraping.

All operational areas, quarantine and fuel storage areas are inspected to ensure the integrity and fitness for purpose of their construction is maintained at all times.

Refer to appendix 13 for the spillage response plan.

Chemical Storage

Chemicals or fuel used on site are stored in an appropriate tank that has an internal or external bund with the capacity to store 110% of the tank capacity. Bunds will be:

- Impermeable and resistant to the stored materials;
- Have no outlet;
- Be designed to catch leaks from tanks or fittings;
- Have a capacity greater than 110% of the largest tank or 25% of the total tankage (whichever is greater);
- Have pipework routed within bunded areas with no penetration of contained surface;
- Have tanker connection points within the bund; and
- Be subject to regular visual inspection.

Refer to appendix 13 for chemical inventory

6.3 Sewer

The site is equipped with a foul waste cess pit which is closely monitored and maintained to ensure compliance with environmental and health and safety requirements. The cess pit is routinely inspected for integrity and capacity, and emptying is carried out at regular intervals by a licensed waste contractor to prevent overflow or pollution risk. All maintenance and emptying activities are recorded as part of the site's environmental management procedures.

6.4 Odour

Due to the nature of the waste types accepted, the site has never had a issue with odour and this has never posed a risk on site. However, to prevent the potential release of odour from the acceptance and storage of waste (although biodegradable/putrescible waste will not be accepted), the following site management methods will be adhered to:

- Strict waste pre-acceptance, and acceptance procedures ensure that only permitted wastes are accepted at the site;
- Waste is removed from the site as soon as there is a full load;
- The site implements good housekeeping in operational areas;
- Incoming wastes will be subject to visual inspection and verification by site personnel who will be aware of the permitted wastes that can be accepted at the facility;
- Any waste which is found to be excessively malodorous is immediately placed in the quarantine area and marked with a red sign. The Site Manager will notify the customer within 24 hours of receipt and arrangements will be made to return the material to the customer at the customer's expense. This would only happen subject to the site accepting non-permitted waste types such as household waste.

6.5 Dust Management

A Dust Emission Management Plan has been prepared as a standalone document to support the Environmental Permit application. The plan outlines the measures in place to prevent, monitor, and control dust emissions from site operations, ensuring compliance with relevant regulatory

requirements and minimising potential impacts on the environment and local receptors. The Dust Emission Management Plan is provided separately as **RGE-2025/001 – Emissions management plan** and should be read in conjunction with this Environmental Management System.

6.6 Noise and vibration

We are awaiting information from the Environment Agency Pre application service regarding Noise and Vibration requirements.

6.7 Pests

Due to the nature of the wastes accepted at the site, it is unlikely that pests pose a risk at the facility.

The facility will be inspected by both site management, TCM and operatives for infestations of pests, vermin and insects on a routine basis. In the event that specific waste is found to be responsible for attracting scavengers, pests or infestation, this waste will be removed from the site as soon as practicable. A specialist pest control contractor will be deployed if required. Other measures will be to:

- Ensure all waste produced on site will be placed in designated lidded bins.
- All designated storage areas will be inspected on a weekly basis and entered into the site log book; and
- Any pest or vermin infestation will be reported and a commercial pest control company will be instructed to attend the site as soon as possible.

6.8 Litter

Due to the nature of the wastes to be accepted on-site, it is unlikely that the release of litter will pose a serious risk.

The boundary of the site and the immediate outside vicinity are regularly checked, and any windblown litter collected and disposed of appropriately. It is the responsibility of the site staff to constantly monitor the site for any signs of escaping materials either from within the site or from vehicles delivering or removing wastes to and from the site. Inspections will be carried out on a daily basis and a record maintained within the site diary.

The following control measures have been identified;

- Monitoring of litter and undertake litter picking if required;
- All litter produced on site is removed at the end of each working week and placed in a suitable lidded bin at the end of each working day
- In extremely dry and/or windy conditions, any waste produced on site e.g. food packaging will be place in a lidded bin.

6.9 Mud and Debris

Access to the site is via Royal Eagle Close, the following measures are taken in order to prevent the deposition or tracking of mud and debris from the site onto public areas or highways:

- Waste acceptance and storage areas of the site benefit from impermeable surfacing which reduces the likelihood of mud tracking into vehicles;
- The site will implement good housekeeping arrangements. All areas of the site will be cleaned on a daily basis;
- Incoming vehicles containing wastes are enclosed, or sheeted
- All vehicles leaving the site are visually inspected by site operatives to ensure they are clear and that the vehicle is sealed/sheeted before being exported from the site
- Vehicles will be cleaned as necessary;
- Daily visual site inspections by site operatives will identify any problems with mud and debris. Should problems occur they will be cleaned up as soon as practicable;
- Site roads are maintained free of significant quantities of mud and debris; and
- Where necessary road cleaning equipment can be deployed. In the event that mud or debris arising from the site is deposited onto public areas outside the site, the following remedial measures will be implemented:
- The affected public areas outside the site will be cleaned;
- Traffic will be isolated from sources of mud and debris within the site to prevent further tracking, and measures will be taken to clear any such sources as soon as practicable; and
- Provision will be made for road sweepers (if required) on the site access roads to stop any mud being carried onto public roads.

7.0 Information

All relevant notifications and submissions to the EA regarding the site will be made in writing and will quote the permit reference number and the name of the permit holder. Records must be maintained for at least 2 years (non-hazardous), and 5 years (hazardous), however in the case of off-site environmental effects, and matters which affect the condition of land and groundwater the records shall be kept until permit surrender.

7.1 Reporting and Notification

TCM

The EA will be informed in writing of any changes in the technically competent management of the site and the name of any incoming person, together with evidence that such person has the required technical competence.

Waste Types and Quantities

A summary report of waste types and quantities accepted and removed from the site each quarter will be submitted to the EA within 1 month of the quarter end unless otherwise required by the permit conditions.

Relevant Convictions

The EA will be notified of the following events:

- RGE Recycling Limited Directors being convicted of any relevant offence; and
- Any appeal against a conviction for a relevant offence and the results of such an appeal.

Notification of Change of Operator or Holder's Details

The EA will be notified of the following:

- Any change in the operator's trading name, registered name or registered office address; and
- Any steps taken with a view to the company going into administration, entering into a company voluntary arrangement or being wound up

Adverse Effects

The EA will be notified without delay following the detection of the following (if it is causing or may cause significant pollution):

- Any malfunction, breakdown or failure of equipment or techniques;
- Any accident;
- Fugitive emissions which have caused, are causing or may cause significant pollution; and
- Any significant adverse environmental and health effect.

8.0 Fire

Sites that store combustible wastes are at risk from waste stockpiles catching fire. These events can pose an environmental risk to receptors off site, both from the smoke plume from the fire and from the firewater runoff created by any firefighting activities. Sites storing combustible materials such as paper, plastics, cardboard and scrap metal and tyres are required to have in place a fire prevention plan that follows the standards prescribed in the Environment Agency's (EA) guidance documents – updated 11th January 2021. RGE Recycling Limited is permitted for the acceptance and treatment of combustible waste and have an approved fire prevention plan.

8.1 Fire Evacuation Procedures

Emergency Action Plan (EAP) The procedure to be followed in the event of fire, and displayed in "Fire Action" notices sited where shown on the fire emergency drawing, is:

IF YOU DISCOVER A FIRE YOU MUST:

- Raise the alarm by operating the nearest fire alarm call point
- Assist any member of the public , contractor, or staff who needs assistance.
- Attack the fire with the equipment provided (if you can do so without undue risk)
- Obey Building Managers and Fire Wardens instructions.

IF YOU HEAR THE FIRE ALARM YOU MUST:

- Assist any member of the public or colleague who needs help.
- Leave the premises by the nearest available exit, closing all doors behind you.
- Report to the person in charge of the assembly point at: In car park area opposite exit, away from the building
- Do not stop to collect personal belongings.
- Do not shout or run - this may cause panic.

YOUR RESPONSIBILITIES

- You must know how to find the escape routes provided.
- You must know how to operate the fire alarm.
- You must know how to use the firefighting equipment.

FIRE WARDENS RESPONSIBILITIES

- Fire wardens will check their designated zones to ensure that all persons have vacated the premises.
- Fire wardens will liaise with emergency services to update as to the situation
- Fire wardens will conduct roll-call to identify all persons in premises at time of emergency.

CALLING THE FIRE BRIGADE

- A nominated person (or fire wardens in his absence) will call the Fire Brigade immediately once the fire alarm sounds. (Management must ensure that the Fire Brigade is called, even if the designated person fails to do so).
- There are 'Out of hours' contacts, who will be responsible for attending site and will contact the fire brigade in the event of an alarm. RGE Recycling have an agreement in place with resident businesses who operate on a 24 hour basis. The agreement is to notify the designated person in the event of detecting a fire.

REFERENCES

Reference 1.
Environment Agency guidance: 'Develop a management system' -
https://www.gov.uk/guidance/develop-a-management-system-environmental-permits

Reference 2.
British Geological Survey online database, Geology of Britain Viewer accessed at:
http://mapapps.bgs.ac.uk/geologyofbritain/home.html

Reference 3.
Environment Agency, 'What's in Your Backyard' online database accessed at:
http://maps.environment-agency.gov.uk/wiyby/wiybyController?ep=maptopics&lang=_e

Reference 4. Natural England 'MAGIC' online database, accessed at:
http://magic.defra.gov.uk/MagicMap.aspx

Reference 5. OPRA Scheme for Waste Facilities April 2017

Reference 6. Environmental Permitting Charging Scheme & Guidance Version 5 January 2017 R7. Integrated Pollution Prevention and Control, Reference Document on Best Available Techniques for the Waste Treatments Industries August 2006

9 Changing climate

Summer daily maximum temperature

Impact 1

Potential for increased waste reactions or fires involving heat sensitive or combustible waste.

The mitigation for this includes:

- The site does not accept heat sensitive wastes but if such wastes are construed as such then it will be stored only within the inside of buildings and containers
- there is suitable segregation and separation of waste types.

Impact 2

Dry vegetation in and around the site presents an increased fire risk during extremely dry weather.

There is no vegetation surrounding the perimeter of the site but no hot works occur within this area, there is also a no smoking policy on site.

Impact 3

Potential increase in elevated temperature expansion and stress of plant, pipework, and fittings.

All fixed and mobile plant is inspected daily and weekly before the start of every shift which will mitigate the risk of elevated temperature stress to the machinery. All fixed and mobile plant is operated within a ventilated indoor setting which will further reduce the equipment to the exposure of excessive heat.

Impact 4

Potential increased dust emissions from processing areas and site roads.

The site does not accept wastes consisting mainly or solely of dusts. Furthermore, waste metals (even in its smallest form) is not inherently associated with dust emissions. With the site processing metals there is also a financial incentive to prevent the escape of waste metals. The site is also cleaned down daily to reduce excessive dust build up.

Impact 5

Stockpiled waste piles:

- attracting increased numbers of pests.
- leading to an increased incidence of odour emissions.

The mitigation for the above includes:

- The waste acceptance procedures in place to prevent excessively odorous or insect-infested loads being deposited at the site. The site does not accept organic waste.
- Waste is deposited and turned around rapidly, storage areas and bays are cleaned and washed down regularly.

Winter daily maximum temperature

Impact 1

Slightly higher winter maximums could generate regular odour complaints and pest infestations.

The mitigation for the above includes:

- The site will place down a series of pest traps within the site which will reduce the risk of pests (where needed). Although this is not a measure that needs implementing at this stage due to the waste types not attracting pests/vermin.
- Waste acceptance procedures in place to prevent excessively odorous or insect-infested loads being deposited at the site.
- Waste is deposited and turned around rapidly, storage areas and bays are cleaned and washed down regularly.

Impact 2

Lower winter temperatures could result in an increased risk of pipes freezing.

The mitigation for the above includes:

- Each piece of mobile and fixed plant is inspected on a daily and weekly basis to ensure that there are no ruptured pipes or leaking fluids. (Coolant or hydraulic fluid).
- Each piece of machinery is also serviced at the recommended manufacturers intervals.

Daily extreme rainfall

Impact 1

Site could flood due to excess rain fall

The mitigation for this will include:

- Suitable measures are in place for the management of anticipated surface water and flood waters.
- Unmade areas will cause vertical leaching of clean surface waters
- External areas where wastes are handled or stored are provided with contained drainage.
- Site is not considered a flood risk
- Drainage is inspected and serviced

Average winter rainfall

Impact 1

There is potential for flooding

The mitigation for this will include:

- Suitable measures are in place for the management of anticipated surface water and flood waters.
- Unmade areas will cause vertical leaching of clean surface waters
- External areas where wastes are handled or stored are provided with contained drainage.

Sea level rise

Impact 1

The site is not located near any coastline. Therefore, there is no risk from sea level rising.

Drier summers

Impact 1

Potential increased use and reliance on mains water for dust suppression, cleaning, and fire water.

The mitigation for this will include:

- On-site alternative water resource can be installed where it is evident that this will benefit the site.

Drawing 1 – Site Location Plan

Whitewall Creek

RGE Recycling Limited

George Summers Close

Anthonys Way

Chaucer Close

Royal Eagle Close

169760

169600

169440

575200

575360

575520

0 20 40 60 80 100 m

Key:

Permit Boundary

Drawing Title: Permit Boundary Plan

Ref:

Scale: 1:1600 (A3)

Date: 2025-10-07

Revison:

Drawn By: TW

Address: RGE Recycling, Royal Eagle Close, Rochester, Kent, ME2 4NF

Changelog:
- N/A

RGE RECYCLING LTD

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Drawing 2 – Sensitive Receptor Plan & Table

Key:

- Permit Boundary
- 1 km Buffer
- Residential Area
- Commercial Area
- Agricultural Area
- Public Use Area
- Designated Site Area
- Non-Designated Site Area
- Residential ID
- Commercial ID
- Agricultural ID
- Public Use ID
- Designated Site ID
- Non-Designated Site ID
- Heritage Site ID
- Railway
- Surface Water
- Woodland

Drawing Title:	Sensitive Receptor Plan 1 km
Ref:	
Scale:	1:7500 (A3)
Date:	2025-04-01
Revison:	
Drawn By:	TW
Address:	R GE Recycling, Royal Eagle Close, Rochester, Kent, ME2 4NF

Changelog:
- N/A

RGE RECYCLING LTD

EnviroAwards

0 100 200 300 400 500 m

574500 575250 576000 170250 169500 168750

A228 A289 A231

Drawing 3 – Site Layout Plan

Appendix 1 – Site Operating Procedures

Key:

- Permit Boundary
- Impermeable Surface
- Building
- Legio Block Wall
- Quarantine Area
- Mobile Plant Parking Area
- Fuel Bowser
- Ro-Ro Skip
- Fire Extinguisher
- Spill Kit
- Interceptor Gully Cover
- Interceptor Balloon
- Surface Water Flow

Drawing Title: Site Layout Plan

Ref:

Scale: 1:400 (A3)

Date: 2025-07-30

Revison:

Drawn By: TW

Address: RGE Recycling, Royal Eagle Close, Rochester, Kent, ME2 4NF

Changelog:
- N/A

RGE RECYCLING LTD

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Appendix 2 –Environmental Permit

Appendix 3 – Training Matrix

Appendix 4 – Technical Competence

Appendix 5 – Site Monitoring/Diary

Appendix 6 – Complaints Procedure

Complaints Procedure and Record Form

PRINCIPLE

This section outlines the general procedure for receiving a complaint at G Saits Limited Permitted Facility. The purpose of this procedure is to ensure that any site operative working on site is aware of the procedures for the correct recording of a complaint.

SCOPE

This procedure covers how to record and respond to a complaint.

RESPONSIBILITY

All site operatives are responsible for carrying out the procedure as detailed below. Any changes required are the responsibility of the Site Manager or designated person to update and re-issue the amended procedure.

Complaints Record

Any complaints received from the local public or any local receptor are to be recorded on the Complaints Record form. The complaint is also to be recorded in the site diary.

All site operatives are required to follow the steps set out below if a complaint is received at the site;

1. Record details of the complainant (including; name, address and a telephone number) if provided.
2. Make a record of the date and time the complaint was made.
3. What happened, what was the complaint actually about?
4. Was anyone else on site or other stakeholders aware of the issue and if so, who?
5. Once confirmation is made that the complaint issue relates to the site, investigate the source of the problem. Contact the Site Manager
6. Record how the site has implemented methods to ensure the issue will not cause complaint in the future.
7. Make a record of any signs of pollution. If the complaint (such as emissions to groundwater or a local watercourse) is significant, the Environment Agency will need to be contacted on 0800 807060 as soon as possible. The severity of the incident shall be determined by the Site Manager.
8. The Site Manager shall send an email to the local Environment Agency office.
9. All Complaint Record forms shall be signed and dated.

Any actions taken in response to the complaint are to be recorded on the Complaints Record form and the site diary. On site visits, if the local Environment Agency Site Officer requests to see the site diary, all complaints should be shown. The complaints received are to be reviewed at future site audits to ensure these complaints will be avoided in the future. Health and safety All site operatives shall work with due regard to all relevant Health and Safety Regulations currently in existence relevant to operations on site.
NOTIFICATION AND DISTRIBUTION LISTS Once approved this document shall be published and will be effective from date of approval. Where appropriate, paper copies of this document shall be distributed as Controlled copies. Electronic notification to named users shall be recorded in the Audit History Report when a document is published/becomes approved or effective.

COMPLAINTS FORM	
	REPORT No.
Message/Letter recieved by:	Date Received:
Passed to:	Time:
1) COMPLAINANT	
Name:	
Address:	
.....	
	Post Code.....
Telephone:.....	
2) NATURE OF COMPLAINT	
Description:	
Date of incident:.....	
3) INVESTIGATION AND ACTION TAKEN	
Complaintant contact: IN WRITING/TELEPHONE/FAX/E-MAIL/IN PERSON	
SIGNATURE:	
NAME:	
DATE:	

Appendix 7 – Internal Audit

Appendix 8 – Risk Assessment

Appendix 9 – Contingency Plans/Incident Response Plan

Appendix 10 – Calibration

Appendix 11 –

Appendix 12 – Training Records Attendance Form

Appendix 13 –Spillage Response Plan