



**Ravenswood Environmental Services Ltd**

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# Environmental Management System

Version 2

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Roadstone Limited

Unit 5 Invicta Park,  
New Hythe Lane,  
Larkfield  
Aylesford,  
Kent,  
ME20 7FG

**Client:** Roadstone Limited

**Reference:** **EPR/LP3428LU/P001**

**Issued by:** Ravenswood Environmental Services Ltd

**Prepared by:** Millie Coleman

**Date:** 10/11/2025

**Reference Number:** EMS-OP-02

<b>Roadstone Limited</b>	<b>Operating Procedures</b>		
<b>Document Reference: EMS OP 02.</b>		<b>Issue Number: 2</b>	<b>Issue Date: 11/2025</b>

### DOCUMENT CONTROL SHEET

<b>Version Reference</b>	<b>Date</b>	<b>Reason for Change</b>	<b>Prepared by</b>	<b>Issued by</b>
1	04/2025	Permit application	M Coleman	Ravenswood Environmental Services
2	11/2025	Update EWC tables	M Coleman	Ravenswood Environmental Services

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## 1 INTRODUCTION

### **Roles and Responsibilities**

#### **Technical Competence**

A technically competent person (TCM) will visit the site at a frequency no less than weekly and be available for discussion regarding all aspects of the operation. Any incidents / accidents will be communicated to the TCM at the earliest opportunity following the event.

During the hours of operation, the site will be supervised by at least one member of staff who is suitably trained and conversant with the requirements of the Environmental Management System and the Environmental permit, with respect to:

- Waste acceptance and control procedures.
- Operational controls and environmental monitoring.
- Site maintenance (site inspection checklist).
- Record keeping.
- Emergency action plans.
- Notification to the Environment Agency.

A Technically Competent Manager has responsibility for ensuring these procedures are adhered to which include communication with staff and contractors, and the provision of adequate training.

A Technically Competent Manager will be responsible for updating and re-issuing these procedures as necessary and ensuring all staff are trained in new procedures.

The appointed Technically Competent Manager (TCM) will be qualified to manage a Low-Risk waste recovery site and will maintain continued professional competence as required by the Waste Management Training & Advisory Board (WAMITAB).

The TCM's qualification certificate will be made available to the regulator on request.

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The site manager and TCM shall provide contact details to the relevant regulating authorities should out of hours' contact become necessary. Contact details of the site manager and TCM shall be kept available in the site office. Any changes to the management of the site, including change of company name, director and Technically Competent Manager, shall be communicated to the local Environment Agency office.

## 1.1 Purpose

This Environmental Management System (EMS) has been prepared by Ravenswood Environmental Services Limited in support of waste management operations and permit application for activities carried out at: "Roadstone Limited, Unit 5 Invicta Park, New Hythe Lane, Larkfield, Aylesford, Kent, ME20 7FG."

This document seeks to ensure that:

- The risks that the activities pose to the environment are identified
- Measures that are required to manage the risks are identified
- Activities are managed in accordance with the management system
- Performance against the management system is reviewed at regular intervals; and
- Compliance with the waste management permit

The purpose of these procedures is to guide staff and contractors in the safe conduct of their duties in a manner which controls the environmental impact of the company's operations. The procedures cover normal operations on site and should be read in conjunction with other operational management plans.

## 1.2 Scope

These Operational Procedures cover:

- Operations involving non-hazardous waste
- Treatment of non-hazardous waste

The procedures relate to the permitted activities at Roadstone Limited Unit 5 Invicta Park, New Hythe Lane, Larkfield, Aylesford, Kent, ME20 7FG

This Environmental Management System document has been produced in support of the application for a new bespoke permit for Roadstone Limited.

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### 1.2.1 Permitted Waste Management Operations

*Table 1: The permitted activities will cover those set out in Table 1.*

<b>Description of specified activity</b>	<b>Limits of specified activity</b>
R3 Recycling/reclamation of organic substances which are not used as solvents  R4 Recycling/reclamation of metals and metal compounds R5 Recycling/reclamation of other inorganic materials.  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)  D15 Storage of wastes pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)  D9 Physico-chemical treatment  D14 Repackaging prior to submission to any of the operations numbered D1 – D13.	Treatment consisting only of sorting, separation, screening, shredding, crushing or compaction of waste into different components for disposal (no more than 50 tonnes per day) or recovery.

### 1.2.2 Operating techniques

The location and nature of stockpiles may vary according to operational demands. The maximum quantity of waste stored shall not exceed 15,000 tonnes at any one time. No more than 200,000 tonnes of waste shall be accepted and treated per year.

Fixed bays for the storage and treatment of wastes are present on site, constructed of concrete, metal or equivalent structural materials and designed to provide containment and reduce cross contamination of wastes. All constructed and maintained to a standard which is fit for purpose and sited in an area of impermeable concreted surface served by sealed drainage.

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### 1.2.3 Waste Treatment

The waste treatment process involves manual and mechanical sorting to separate materials such as soil, wood, metal, hardcore, plastic and card.

The waste will be deposited within the reception area where a visual check will be undertaken to ensure non-conforming items are not present. Large items are removed from the waste at this stage, for example, mattresses and large plastic items. These will be removed manually or using the mechanical grab/loading shovel and placed in designated bay located to the south of the site.

The remaining waste will be loaded into a shredder. From here it will progress through a series of stages on a conveyor belt. The next stage is through the trommel screen. This is a rotating drum which is used to break the consistency of the waste and to remove the finer particles. These particles drop into a bay beneath the trommel. Overband Magnets and Eddie Current are incorporated into the treatment process to remove ferrous and non-ferrous metal.

A soil screener will be employed to segregate soils/aggregates into various gradings by introduction of sized screening grids. This type of equipment is generally mobile and can, if required, be moved to different stockpiles to perform the screening process. However, the operation is best suited to using the screener in one location and deposit the soils close at hand where an excavator can load the screener.

It is intended to accept topsoil, subsoil and building rubble (hardcore) for treatment and storage in preparation for off-site re-use. Soils and hardcore material derive from local landscaping and earthworks contracts undertaken by third parties.

Screened material will be transferred to a convenient nearby stockpile ready for export. This procedure depends on the nature of the material being processed as screened topsoil is best kept dry and friable for optimum handling efficiency. This process is repeated for crushing of concrete and screening of building rubble.

It is also proposed by the operator to include EWC 20 03 01 to the list of wastes in appendix G, as this waste type is known to be recyclate rich and widely available.



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EWC 20 03 01 consists of the following items:

- Paper and cardboard
- Wood
- Plastic
- Film
- Mixed metal
- Occasional brick pieces and soil

This waste type shall be accepted pursuant to Waste Acceptance Procedures which are stated in this document and other supporting documents and segregated in the manner described throughout the supporting management plans. But for the purpose of completeness, a brief description is given here:

Following conformity of the waste and documentation at the weighbridge the vehicle will be directed to the tipping point which is in the location of the waste handling grab. This allows the waste load to be broken for visual inspection and large recyclates to be removed mechanically and the remainder manually sorted into individual waste types.

Treatment consists of:

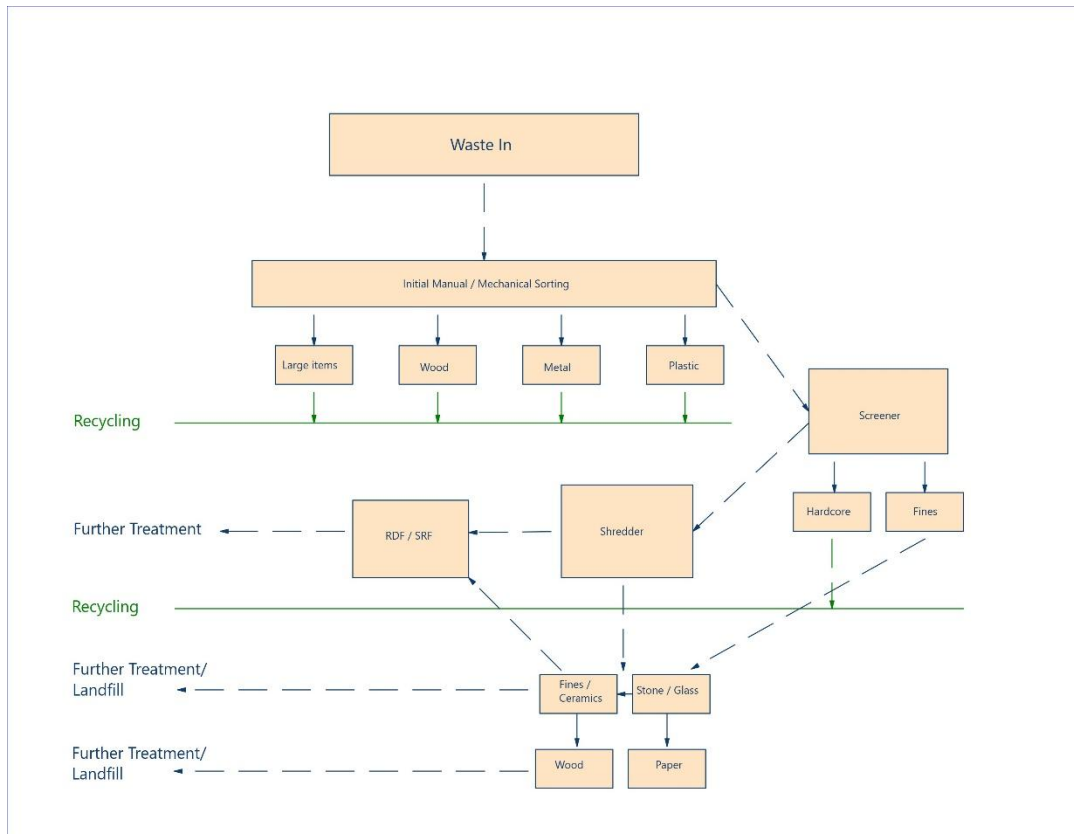
Manual pre-sorting to remove waste types such as cardboard, paper, wood and metal, followed by mechanical treatment consisting of, screening, shredding, crushing and compaction of wastes.

The primary purpose of treatment is recovery of various waste types pursuant to the Waste Hierarchy with minimal residues for disposal.

Materials that are not suitable for processing will be segregated to one side in readiness for off-site disposal or dispatched to a suitable treatment facility for further processing.

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### 1.3 Waste Treatment Diagram



### 1.4 Management System

The Management System covers all aspects of operations and aims to effectively manage the impact of the business on the environment including the health and safety of staff. The key documents include:

- Documents: Procedures designed identify the potential for fugitive emissions, mitigation and control.
- Forms: on which to record information and provide evidence of the system functioning as designed.

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## **2 MANAGEMENT OF OPERATIONS**

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

- ☐ waste acceptance and control procedures.
- ☐ operational controls.
- ☐ maintenance.
- ☐ record-keeping.
- ☐ emergency action plans; and
- ☐ notifications to the EA.

The site will be managed by sufficient staff, competent to operate the site. The management system will deliver the following:

- ☐ all staff will have clearly defined roles and responsibilities.
- ☐ records will be maintained of the skills required for each post.
- ☐ records will be maintained of the training and relevant qualifications undertaken by staff to meet the requirement of each post; and
- ☐ operations will be governed by standard operating instructions.

Operations at the site will be under the overall control of a technically competent person who holds the relevant Certificate of Technical Competence (COTC) under the Waste Management Industry Training and Advisory Board (WAMITAB) scheme.

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## **2.1 Site Layout and Signage**

The boundary of the permitted area is shown in Appendix B. A Site Layout Plan is shown on Drawing reference. DRWG RSL-AC-01 Appendix C.

Staff will only conduct operations in the permitted area of the site, following instructions provided by the Site Manager.

At the entrance to the site a sign board will display the following information:

- Permit holder's and Operator's name
- An emergency contact name and the Operator's telephone number
- A statement that the site is permitted by the Environment Agency
- The permit number.
- Environment Agency national numbers, 03708 506506 and 0800 807060 (incident hotline)

The sign will be kept in good order to ensure it is legible.

A noticeboard will be maintained in the site office. A copy of the Environmental Permit and a copy of the company's Health and Safety Policy will be displayed, together with any other relevant notices. A copy of this document will be kept in the site office.

## **2.2 Security**

Vehicles and visitors must report to the site office before being permitted access to the site. A visitors' book is maintained in the office to record the name, date, time and reason for the visit. The perimeter of the site is formed of concrete panels emplaced to a height of 4m and located on a raised concrete plinth. The outward facing surface of the perimeter wall is lined with solid metal panels. There is a single ingress and egress point provided with lockable 4-metre-high gates. The site is bordered to the east by the river Medway and immediately to the west is southeast rail line, both providing an additional level of security.

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### **Control of visitors**

- All visitors will report to the site office to state the purpose of their visit and sign the visitor's book, indicating the time of arrival on site, vehicle details if applicable and reason for their visit.
- The site manager / TCM will be informed of their arrival, and they will be asked to remain in the site office until the manager / TCM arrives.
- Issue of Site Rules is not necessary under these circumstances when visitors are in company with the site manager / TCM.
- Appropriate PPE will be issued if required
- Pertinent rules, such as the no smoking policy will be communicated at the initial meeting and should the visit require review of operations, warnings of plant movement and potential hazards will be given.
- Site operatives will be warned of impending pedestrians visiting operational areas.

Before leaving the site, visitors will enter the time of departure in the visitor's book.

### **2.3 Incidents and non-conformances**

All incidents and non-conformance will be reported to the Site Manager who will investigate the incident and complete an incident report. Non-conformances relating to non-permitted waste will be specifically recorded on the rejected load form (appendix J).

Incidents include complaints from the public, any observations that mean procedures are not being adhered to or accidents such as spillages. This procedure does not replace the reporting of health and safety incidents which fall under the scope of Health & Safety.

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## **2.4 Technical Competence and Training**

### **2.4.1 Site Operations**

The overall operations will be overseen by a Site Manager. There will also be a Site Supervisor to oversee the day-to-day operations. A Technically Competent Manager (TCM) will be responsible for ensuring the requirements of continued competency is met. A copy of the Certificate will be displayed on the office noticeboard. The TCM and Site Manager will both carry out similar functions on site, with the Manager providing the overall management to ensure compliance with the waste management permit.

The Site Supervisor will be responsible for the control of incoming and outgoing vehicles, checking Duty of Care documentation, keeping and maintaining all computerised records, checking in all visitors to the site, issuing Health & Safety instructions and reporting any complaints to the management team.

Other site personnel will include administrative staff and site operatives.

All personnel will have access to a copy of the Environmental Permit and these Operational Procedures.

All subcontractors will be notified of the site rules and records will be kept of all subcontractors working on site using the appropriate form.

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## **2.4.2 Site Management**

### **Responsibilities**

Site Management will be responsible for:

- Investigating any incidents or non-conformances or complaints in accordance with the relevant procedures and reporting forms.
- Ensuring that required data is provided to the Environment Agency at the agreed frequency.
- Daily site checks shall be undertaken and recorded in the site diary
- Ensuring site maintenance is completed in accordance with these procedures.
- Ensuring all drivers are familiar with the site rules.
- Ensuring all operational staff have a suitable induction and have had the relevant training.
- Ensuring all staff are familiar with safe operation of all necessary aspects of the site.

## **2.4.3 Site Operative Responsibilities**

It is the responsibility of Site Operatives to:

- Act in accordance with the instruction given to them from the Manager or Site Supervisor.
- Follow these operational procedures for all stages of waste handling.
- Report any incidents or non-conformances to members of the management team.
- Ensure all equipment used on site is checked before use each morning for signs of wear and tear which could compromise health and safety or environmental protection.
- All issues noted with equipment, or the condition of the site must be reported to the Site Manager immediately, before the equipment is used.

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#### 2.4.4 Training

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

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

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

*Table 2: Staff training requirements*

<b>Training</b>	<b>Super vis or</b>	<b>TC M</b>	<b>Site Manager</b>	<b>Site Operative</b>
Induction	X	x	x	x
Accidents and Emergency	X	x	x	x
Fire Prevention	X	x	x	x
Amenity Management	X	x	x	x
Plant Training	X	x	x	x
Vehicle marshalling	X	x	x	x
Waste handling	X	x	x	x
Environmental Permitting	X	x	x	x
Complaints and Incidents	X	x	x	x
Spillage Procedure	X	x	x	x

#### 2.5 Site Records

The Site Manager will be responsible for ensuring the maintenance of site records and are available to staff and regulating authorities. Records will be kept eligible and in a clearly marked folder.



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### 2.5.1 Site Diary

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

- Construction work
- Start and finish of daily waste management activities on site (operational hours)
- Maintenance
- Breakdowns
- Emergencies
- Problems with waste delivered and action taken
- Site inspections and consequent actions carried out by the operator
- Technically competent management attendance on site; the date and the time onto site and the time left site
- Dispatch records
- Weather conditions
- Complaints about site operations and actions taken
- Environmental problems and remedial actions

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

## 2.6 Inspection and maintenance

Site Management will be responsible for inspecting the storage areas and preventative maintenance will be undertaken according to the Site Inspection Daily Checks.

Plant and machinery on site are visually inspected by the operator before it is used as part of management of their own risks and health and safety. This is covered in training for staff and operatives. In addition, an equipment check shall be made by the Site Manager as part of Daily Checks and recorded on the appropriate form.

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

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## **2.7 Complaints**

### **2.7.1 Roles and Responsibilities**

The TCM or Site Manager has the overall responsibility for this procedure.

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

### **2.7.2 Definition**

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

### **2.7.3 Procedure**

When the site receives a complaint, a record is summarized in the Site Diary. Full details will be provided in the complaints form.

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

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

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

## **3 WASTE ACCEPTANCE PROCEDURES**

### **3.1 Pre-Acceptance Procedures**

Waste classification shall be undertaken pursuant to appendix N of the Environment Agency WM3 guidance document for the classification of waste. Emerging legislation may necessitate reclassification of some wastes in the future and in such circumstances Environment Agency guidance will be sought. Some particularly complex assessments may require dedicated management plans to aid safe and appropriate treatment or disposal of wastes and in such cases these management plans shall be incorporated within this document.

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In the event that previously treated waste is brought to site for further processing, EWC 19 12 12 must be assigned, and the producer shall be required to demonstrate compliance with the requirements of WM3 and provide copies of their sampling plan and assessment results prior to delivery of the waste.

Waste acceptance procedures shall be maintained in accordance with legislative requirements and commensurate with site operations.

Strict acceptance procedures are included within the Environmental Permit to ensure that only uncontaminated wastes are accepted at the site. These procedures will identify actions and measures to be taken:

- Prior to accepting materials at the application site, including source checking of the waste source location and historic records.
- During delivery to ensure that the materials are as described, and as permitted within the Environmental Permit.
- If materials, not permitted by the Environmental Permit are delivered to site.

Waste shall only be accepted at the site if:

1. it corresponds to the list of waste in it conforms to the description contained in the documentation supplied by the produced and waste holder
2. its chemical, biological and characteristics make it suitable for its intended treatment
3. any excavated soil from potentially contaminated sites has been shown by prior chemical analysis and assessment to be suitable for the intended use without significant risk of pollution; and
4. it is visually and olfactory inspected on arrival and before it enters the treatment process to ensure that it will comply with the permit

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### **3.2 On Site Waste Acceptance**

#### **3.2.1 Waste acceptance procedure**

##### **Waste Acceptance / Duty of Care**

All waste materials that enter the site are subject to this waste acceptance procedure.

##### **A. Waste Carriers Licence**

Vehicles entering the site will do so via the weighbridge office, the vehicle will enter the weighbridge, and the driver will report to the weighbridge operator.

Whilst vehicles are within the permitting boundary of the site, they shall be governed by the written procedures in force and conditions of the site permit.

All customers using the site will hold a valid waste carriers' licence should they be required to do so. A copy of waste carrier's details will be retained on site for future reference.

Companies failing to produce a valid waste carriers' licence will be allowed entry for disposal to prevent the potential for unlicensed disposal if rejected from site. The EA will be contacted and advised of the company's details. Further entry to site will be refused until such time that they are registered.

The site will keep a copy of the licence of regular customers for reference. Occasional customers will have to prove that they hold a valid waste carriers' licence before tipping.

All companies making waste deliveries to site must hold a relevant waste carriers' licence, operating under the auspices of another carrier is **not** permitted and, in this instance, vehicles will be refused entry.

##### **B. Duty of Care Waste Transfer Note**

All customers will have to show a copy of their duty of care document to the weighbridge staff unless an annual transfer note is in place. A list of the approved annual waste transfer note holders will be recorded and displayed at the weighbridge.

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The weighbridge clerk will check the material description and EWC code and confirm that this material is acceptable within the permit conditions. Should the transfer note be deemed incorrect, then the weighbridge clerk will make the appropriate communications to the customer to rectify and clarify the right EWC code. Written confirmation is required from the customer when changing the original details of a transfer note.

It is the producer's responsibility to correctly describe the waste being carried and any subsequent alterations to delivery details will be carried out by the vehicle driver under instruction from the customer / waste producer. Any such changes will be noted in the site diary, recording details of the transaction. The site manager / TCM will be informed of such occurrences.

In the scenario mentioned above the vehicle delivering the waste will be singled out for closer inspection at the weighbridge and at the disposal point to ensure the waste has not been miss-described. Any failure at this point, the vehicle will be subject to the rejected load procedure (see section 5.)

A copy of the site permit will be displayed in a prominent position in the weighbridge office for reference when required. The site manager or TCM will hold "toolbox talks" at regular intervals to discuss such matters as waste acceptance procedures and attendance records will be kept for future reference.

### **C. Issuing the Ticket**

A weighbridge ticket will be issued by the weighbridge clerk, and this will detail the following:

- Producer
- Haulier
- Material Description / EWC Code
- Producer location
- SIC Code
- Volume / material weight
- Date
- Site Weighbridge Operator & Drivers signature

When all checks are complete, and the weighbridge clerk is satisfied that accepting the waste conforms to the conditions of the site permit, a weighbridge ticket will be issued and signed by both parties. The waste delivery driver will retain a copy, likewise the weighbridge clerk will append the transfer note accompanying the load to the weighbridge ticket.

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The waste will be rejected if the documentation is incorrectly filled out, required entries missing or the waste description does not match the requirements of the site permit. Waste rejection procedures will apply in all instances in this regard. (the waste carrier / producer will be given the opportunity to rectify errors on the waste transfer note by demonstrating the authenticity of the waste and correct paperwork)

## **D. Visual Inspection of the Load**

### **At the weighbridge**

When waste materials arrive at the site, they will be assessed against the details stated on the accompanying transfer note and source documentation.

CCTV cameras will be used to provide a visual aspect of the surface of the load and at this point the weighbridge clerk will be aware of any incongruous odours that may be present. If the initial inspection by the weighbridge clerk is inconclusive and some doubt as to the authenticity of the load, special attention will be given at the point of disposal.

### **At the disposal point**

The waste will be visually checked at the point of disposal by the site operative designated to undertake this role. The operative will be familiar with the conditions of the site permit and permissible waste. A simple sniff test will be undertaken in conjunction with a visual examination of the load.

Should a strong odour be detected or the presence of unsuitable inclusions, the unloading will immediately cease, and the site supervisor informed. If the load is found to be non-compliant with the permit conditions or contain substances likely to impede the efficacy of control systems, the waste will be rejected and the appropriate procedure followed.

Where there is uncertainty regarding the conformity of the load or where the vehicle has already left the site, the waste shall be isolated and not transferred until full details of the material are available following which the material will be removed from site and the regulating authority informed if there is suspicion of fraudulent activity. All materials received at the site which require either storage or treatment will be deposited on the impermeable surface.

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## **E. non-conforming waste**

### **Rejected Load Procedure**

Any loads identified as unacceptable *prior to disposal* shall be isolated, prevented from tipping, the driver, customer and site manager / TCM informed, and the most appropriate course of action agreed between all parties.

If the non-conforming waste is hazardous the Environment Agency will be consulted on the best course of action, which may result in the vehicle being redirected to another, suitably permitted waste facility or returned to the waste producer.

Any load or part load identified as non-conforming waste at the point of *discharge* shall be reported to the vehicle driver prior to leaving the site and the site manager / TCM informed. Photographic evidence shall be obtained. Appropriate action will then be decided upon in accordance with 5.3 above.

Details of rejected waste will be kept on site; this will include time and date, haulier and vehicle registration number, producer details, type of waste and reason for rejection.

In the event of a waste being rejected discussions will be held between the site manager and the customer/haulier to determine why the waste was rejected and what measures must be put into place prior to the acceptance of any further waste loads from the same source.

Such events as those mentioned above will be noted in the site diary and form the topic of the next scheduled Toolbox Talk to evaluate the performance of site procedures pertaining to waste acceptance.

### **3.3 Non-Permitted Waste**

Described above in the section concerning waste acceptance procedures.

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### **3.4 Quarantine Area**

The site will have visual checks to minimise the incidents of receiving non-compliant waste. Quarantined waste will be isolated and dealt with previously stated.

### **3.5 Polluting Substances**

It is not anticipated that polluting substances will occur on site as the waste acceptance procedures will actively prevent the potential from imported waste materials. Plant and machinery will be maintained fit for purpose and substances used in scheduled maintenance and servicing will be removed from site.

If consumables are stored on site suitable storage facilities will be made available for safe and secure storage.

### **3.6 Waste avoidance, recovery and transfer off site.**

The operation seeks to maximize the recovery of recyclable materials and avoid disposal to landfill. These will be transferred to specialist facilities for recycling.

In the event of a breakdown in the processing equipment, the operator will contact the manufacturer for advice. If any mobile plant breaks, a replacement machine will be hired to maintain the processes.

If any of the fixed plant break, the operator will take the following actions:

- Divert waste to other waste management facilities
- Arrange for any residual waste to be removed from the site to maintain storage.
- Inform the Environment Agency



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## 4 EMISSIONS MANAGEMENT AND MONITORING

A generic Environment Agency risk assessment has been used in support of this operation and is given in full in (Appendix A).

The operator shall:

- (a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, a revised emissions management plan.
- (b) implement any approved revised emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

### 4.1 Fugitive Emissions to air/ dust and mud

#### **Dust.**

Procedures for preventing emissions to air from waste handling.

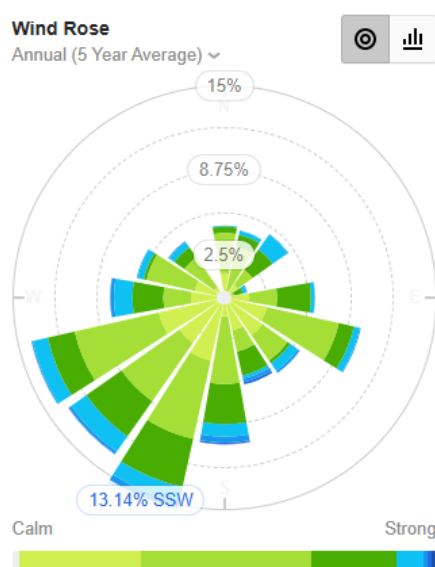
- All waste will be received and treated within dedicated areas.
- Segregated waste will be deposited in enclosed bays.
- The external storage of hardcore and soils will be dampened during windy conditions and stockpiles shall be maintained below the height of the perimeter walls.
- A banksman will assist vehicles manoeuvring and to prevent vehicles from tracking over waste.
- Waste will be unloaded in the area designated for this activity.
- Vehicles leaving the site will be checked and a hose and brush will be used to clean the wheels if deemed appropriate by the Site Manager.
- The entire site is laid of concrete which will facilitate cleaning.

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- A road sweeper will be deployed on site and roads leading to the site should conditions deteriorate to such an extent that mud/ dust particulates are clearly evident outside of the site. A deployment of a road sweeper will be at the discretion of the site manager.
- Speed restrictions on site limit dust arising from vehicles, the site speed limit will be a maximum of 5mph.
- As part of the site daily checks, the Site Manager will check the entire site for evidence of any debris and arrange cleaning as required.
- Regular cleaning of the site to prevent an accumulation of waste.
- Materials processing machinery shall be fitted with internal dust suppression systems and augmented with hoses and various types of dust suppression equipment at the direction of the site manager.
- There is a 4m high perimeter concrete wall around the entirety of the site.
- Dust monitoring shall be undertaken when conditions have the potential to generate dust emissions. Monitoring of site conditions shall be conducted by the site supervisor and site manager throughout the operational day.

The wind rose presented below indicates the prevailing wind direction influencing the site located at Aylesford Maidstone Kent.

*Figure 1: Prevailing wind direction in Aylesford*



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## **Odour**

Black bag waste is normally associated with the generation of odour from waste treatment facilities. Black bag waste will not be accepted on site and personnel shall be aware that waste of this type has the potential to cause a nuisance off site. It is planned to concentrate waste inputs firmly on construction and demolition waste types as these traditionally contain a high percentage of recyclable material.

The following procedures will reduce the potential of odour being generated from waste treatment activities.

- Vehicles will only be un-sheeted when ready to discharge.
- Daily cleaning of the site to prevent any waste accumulation.
- Continuous waste processing and export to prevent waste remaining on site for prolonged periods . In the event of breakdown, arrangements will be made to remove the waste from the site and divert waste directly to alternative facilities.
- Any waste that is particular odorous will be placed into a container and covered with soil. Arrangements will be made to remove the load within 24 hours.

## **Control of Mud and Debris**

Regular inspection of the site entrance road will be carried out by the site manager or his nominee to ascertain the cleanliness of the road and whether action is required to clean / remove debris. Particular attention to the site exit road will be given during periods of inclement weather and high vehicle activity.

Vehicles entering and exiting the site will be sheeted and loaded in a fashion that prevents accidental spillage of material.

Before exiting the site, vehicles will be visually checked by the driver for trapped debris and mud. A standpipe hose is available to remove excess mud if required.

Vehicles shall be loaded on a previously cleaned hard standing to prevent accumulation of mud which potentially could be carried from the site.

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Should prevailing conditions cause mud and debris to reach the public highway, the site manager / TCM shall consider whether the activities causing the incident shall cease and only resume when conditions have improved.

The use of a mechanical sweeper will be considered by the site manager / TCM should conditions necessitate such action.

## **Noise**

The site is located in an industrial environment, remote from public amenities.

Procedures for preventing noise:

- Vehicles will not be allowed to idle on site and drivers will be requested to turn engines off if they are waiting for inspection or unloading instructions.
- Waste handling and treatment will be carried out within the curtilage of the site only.
- Mobile plant will be fitted with “white noise” reversing beepers.
- There will be no playing of music or unnecessary sounding of vehicle horns.
- The storage of soil type material will act as a sound barrier and serve to suppress incidental noise events should they occur.
- The 4m high concrete wall will be maintained to ensure that a solid barrier exists between site operations and the surrounding environment.

## **4.2 Fugitive emissions to groundwater**

There will be no fugitive or point source emissions to groundwater.

This section details the procedures for preventing fugitive emissions to groundwater.

- All waste will be stored and treated on an impermeable hard standing with sealed drainage. The entire site is laid to concrete and engineered to provide a gradient towards open gully drains which are design to capture silts and grits.
- No Fuels or lubes will be stored on site.
- All staff will be trained in the Spillage Procedures as detailed below in section 5

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- The drainage system will be kept fit for purpose, checked weekly to ensure it is free of blockages and water runs freely to the interceptor. The weekly check will include the water level in the interceptor and condition of the filters. The Site Manager shall arrange, no less the bi-annually, to have the filters cleaned and replaced if necessary.

#### **4.3 Pests, Vermin and Birds**

In the event of suspicion of an infestation of pests or vermin a pest contractor will be employed to assess any infestations and advise on appropriate action.

#### **4.4 Point Source Emissions to air**

There are no point source emissions to air.

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

There will be no point source emissions to surface water.

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

There will be no point source emissions to foul sewer as the site drainage system will be serviced by a blind tank.

#### **4.7 Housekeeping**

The site will be cleaned daily by a combination of manual and mechanical means. The cleanliness of the site will be checked as part of the daily site checks undertaken by the site manager or supervisor. The impermeable concrete surface shall be checked for degradation as part of the daily inspection. The inspection shall include the drainage system, buildup of silts in gullies and drains. The perimeter walls shall be checked for security and cleanliness. Plant and equipment shall be checked for oil leaks and buildup of debris and maintained fit for purpose.

There is an area of the site designated for washing/cleaning of vehicles which is formed of impermeable concrete providing a suitable point to clean and inspect vehicles before they leave the site.

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Cleaning of vehicles will be carried out manually by hose and brush if required to ensure water does not leave the area. This activity will only be carried out at the direction of site management.

Vehicles movements to and from the site vary according to the time of year, but typically 60 vehicles movements are anticipated during the dry seasons and reducing during the winter months.

*Table 3: Housekeeping duties*

Issue	Frequency	Action
General site and road cleanliness (presence of mud/debris)	Daily	Sweeping of impermeable surfacing if mud/debris present
Inspect drums/containers and bunds for leaks	Daily	Any leaks to be stopped and cleaned up, containers to be replaced/repared immediately
Visual inspection of boundary wall for damage	Daily	Repair with suitable wall. Record in diary
General site cleanliness (presence of litter)	Daily	Collection from site at end of each working day
Visual monitoring for aerial emissions. Monitor dust at random times throughout the day	Daily	Check site boundaries for visual dust emissions if leaving the boundary stop waste handling operations and damp down with hoses. Record in diary
Surface dust/debris	Daily	Sweep yard and hose in dry weather
Site sign	Daily	Repair/replace if damaged
Pest infestation check	Weekly	Implement pest control contract if presence of pests is noted
Ensure waste is stored in appropriate segregated area within the processing area. Check quantities	Daily	Segregate as and when necessary

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Inspect gulley pots and drainage	Weekly	Ensure these are free of silt and debris, clear/repair as necessary
Check condition of silt trap/catch pit and note levels of silt	Weekly	Remove silt upon build up. Repair as necessary
Check condition of any impermeable surface in the vehicle cleaning area	Weekly	Affect repairs as necessary
Vehicles will be checked for dust and debris.	Daily	Ensure all dust and debris is cleaned from vehicle prior to leaving site.

#### 4.8 Planned Preventative Maintenance

The following types of plant and equipment will be in use at the site and maintained fit for purposes in accordance with the manufacturer's instructions.

- Shredder
- Trommel Screen
- Conveyor belts
- Overband magnet
- Eddie Current
- Loading Shovel
- Grab loader

Site plant and equipment shall be maintained as per the manufactures instructions to ensure their use does not adversely affect the local environment and amenities. Records of breakdowns, repairs and servicing shall be maintained on site and made ready for inspection if required. Plant operators will be trained for the type of plant and operation undertaken and records of such training kept on site for inspection. Training requirements shall be reviewed from time to time to ensure operators remain conversant with the operation and equipment.

This shall include the site permit and this environmental management system.

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A program of routine planned maintenance (appendix I) will be provided for each item of plant and machinery, as well as the processing equipment in order to prevent breakdown and faults. All faults which require corrective action will be reported to the Site Manager to be implemented. Where appropriate, these agreements will include a 24-hour call-out facility.

A selection of the most common spare parts will be stored on site as part of the preventative maintenance programme.

## **5 GENERAL ITEMS**

### **5.1 Fuels and Lubes Storage**

Fuels and lubes will not be stored within the permitted area, however, will be on an adjacent site under the ownership of the company.

### **5.2 Spillage Procedure**

All hazardous liquids that are stored in containers with a capacity that exceeds 5lts will be held in an area that is engineered to prevent leaks or spillage which may cause damage to the environment.

All oils, fuels and lubricants will either be stored in containers that are bunded, double skinned, held on trays or held within an area that has an impermeable surface and sealed drainage. All containers will be free of leaks and maintained in good condition, dispensing equipment such as funnels, nozzles and jugs will be fit for purpose.

Refuelling and maintenance of plant and machinery will only take place in designated areas.

In the Event of spillage, the activity that caused the spillage will cease immediately and will only recommence once the spillage has been cleared.



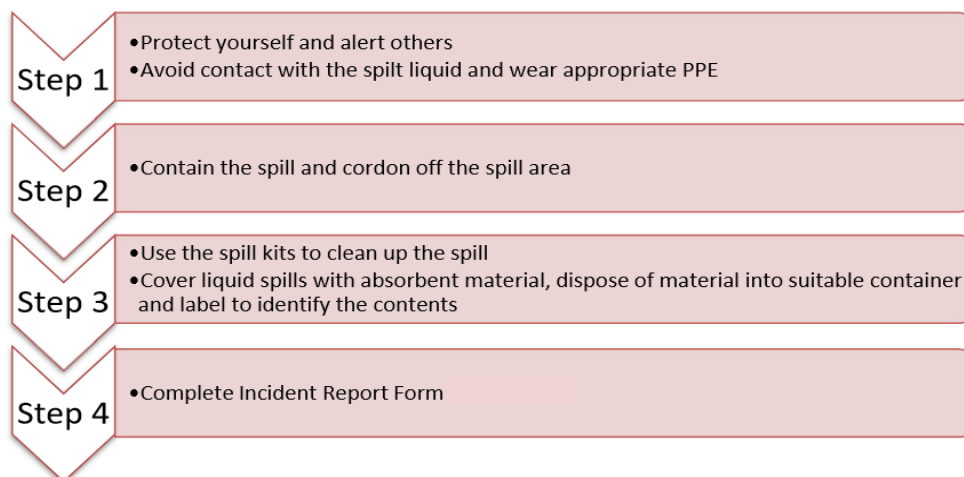
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## Spill Kits

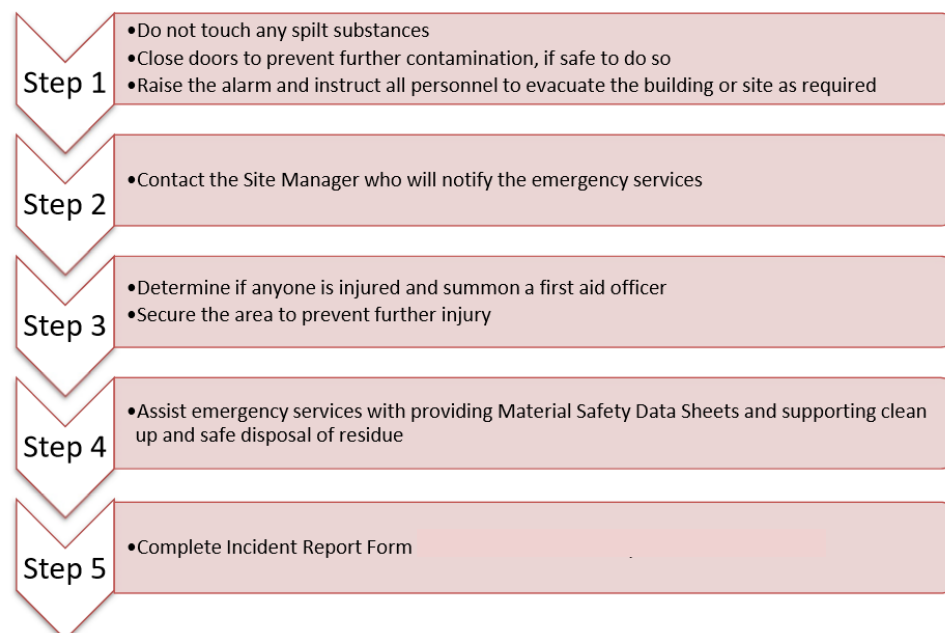
Spill kits will be maintained at the facility in order to respond to any spill incident. The spill kits will include:

- ☐ absorbent granules or sand.
- ☐ protective overalls.
- ☐ chemical/oil resistant gloves.
- ☐ chemical/oil resistant goggles; and
- ☐ a broom and shovel

Minor spills.



Major spills.



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### **5.3 Waste Recovery or Disposal**

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

### **5.4 Water Usage**

Water will be used to provide dust suppression and other abatement requirements. The capture of “grey” water derived from the impermeable concrete surface would lessen the demand on the mains water supply and means of capture and storage of grey water should be exploited.

### **5.5 Energy Efficiency**

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

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

### **5.6 Mechanical Failure.**

If there is a minor malfunction which can be repaired within 48 hours, the facility would continue to store waste up to the limits set out previously. This would equate to the maximum limits managed on site during normal operational conditions. If these limits are reached, no further waste will be accepted until waste treatment has recommenced and the capacity has been restored in the storage bays.

The Environment Agency shall be informed of a major failure and when normal working conditions have resumed. In the event of a major failure of equipment external transport will be engaged to remove waste from site to ensure the facility does not pose a risk of fire or detriment to local amenities.

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### **5.7 Records**

All records contained within the Appendix of this management system shall be completed in a legible manner.

All records required to be made by these standard rules will be retained and be made available to the Environment Agency on their written request. Records of any incident which affect the condition of the groundwater within or outside of the site boundary will be retained for the duration of the permit.

All of the recording systems contained within the Appendix of this EMS or associated documents will be filed in separate clearly marked folders which will be stored and maintained within the manager's office for at least 6 years from the date when the records were made. It will be the responsibility of the site COTC holder to ensure that all records are completed as per the procedures contained within this EMS, and any other documented procedures required by the EA.

### **5.8 Reporting**

The operator shall send all reports and notifications required by these standard rules to the Environment Agency using the contact details supplied in writing by the Environment Agency.

Within one month of the end of each quarter, the operator shall submit to the Environment Agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

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## 5.9 Notifications

The following incidents require the immediate Notification to the Environment Agency:

- Any breakdown, malfunction or equipment failure that has resulted in an emission which has caused or may cause significant pollution.
- Any breach of a limit specified in the permit
- Any significant adverse environmental effect
- Fire

Notifications should be made by telephone on 0800 807060

Any reported incident should be confirmed in writing to the Environment Agency within 24 hours of the incident.

If requested to do so in writing by the Environment Agency, the company will conduct monitoring or sampling.

The company will give the Environment Agency a minimum of 14 days' notice of the date that the monitoring or sampling is to take place. The Site Manager will make the notification and retain a copy.

The operator will notify the Environment Agency in writing of any of the following changes:

- Change in trading name or registered name
- Change in registered office
- Intention to go into administration, voluntary arrangement or being wound up

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## 6. Nearest Receptors and Sensitivity

- The receptors shown below are within 1km of the site.
- Roadstone Limited is located within 500 metres of a designated marine conservation site, classified as a site of special scientific interest (SSSI). Given the ecological sensitivity of this area, particularly with regard to air quality and particular deposition, this EMS has the proximity to the SSSI and other sensitive receptors in mind.
- The site is located approximately 580m due north of the M20 motorway in Aylesford, Maidstone Kent, ME20 7FG (NGR TQ 71565 59431) . Sited between the Strood and Maidstone railway to the east and river Medway immediately to the west, both points almost converging at the southern boundary and in effect isolating the site from access other than from a road bridge (New Hythe Lane) providing access to the site from the north.
- Roadstone Limited is located to the extreme east of the wider industrial estate that boasts a variety of industries. Adjoining the site to the north is a large waste treatment facility operated by London Mining Associates. The exact nature of their business is not known but thought not to involve combustible waste.
- The site is bordered to the immediate east by the river Medway.
- Adjoining the river Medway to the east is a large sewer treatment facility. The distance between the proposed Roadstone Limited eastern boundary and the sewer treatment plant is approximately 700m.
- To the northeast, at approximately 135m lies a large solar electricity generation farm.
- A number of freshwater lakes are located to the east, north and northwest of the site. The nearest being over 400m distant.
- Domestic properties are located immediately south of the M20 motorway, to the west and northwest. There are no domestic properties to the east within 1,000m.
- The results of the pre-application screening conducted by the Environment Agency state that “ *Habitats and/or protected species which you need to consider in your permit application have not been identified*”.

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- The general area to the east of the site is predominantly farmland interposed with farm buildings and extinct quarry workings.
- Within the 1km radius search area for sensitive receptors it should be noted that the region forms part of a large-scale mixed industrial and commercial area.
- There are no care homes, hospitals, or similar sensitive receptors within 1km of the site. Aylesford School lies just outside of the 1km safeguard zone.
- The closest Fire Station is approximately 2.5km away at New Hythe Lane, Larkfield.
- The closest hospital is Approx. 3.8 miles, Maidstone and Tunbridge Wells NHS Trust.
- These are identified in the figure below.

**Table 2 Location of sensitive sites within 1km of the site.**

<b>Reference</b>	<b>Description</b>	<b>Distance From Site</b>	<b>Point of Reference</b>	<b>Sensitivity Concern</b>
A	Sewer Treatment Works	720	Southwest	Low
B	Sewer Treatment Works	160	Due East	Low
C	Solar Power Farm	160	Northeast	Low
D	M20 Motorway	470	South	Moderate
E	Sports Facilities	560	South, southeast	Moderate
F	Domestic Properties	550	Northwest	Moderate
G	Domestic Properties	780	Southwest	Moderate
H	River Medway	0	East	Moderate

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Figure 2: Sensitive receptors within a 1km radius of site.



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## Summary

The risk assessment identifies the likelihood of harm occurring, the consequences and magnitude in the event that harm is caused. The magnitude has been justified based on site specific knowledge.

In summary, the assessment shows that the facility can be managed to minimise the risk of harm to human health, the environment and local amenity. Good management techniques are in place to prevent entrainment of waste materials likely to generate dust when dried or subjected to the passage of vehicles and combined with the general working procedures contained in this EMS, forms a system able to prevent airborne particulate matter reaching sensitive locations.



# Appendices

## APPENDIX A: ENVIRONMENTAL RISK ASSESSMENTS

Source	Pathway	Receptor	Harm	Probability of exposure	Consequence	Magnitude of Risk	Justification	Risk Management	Residual Risk
Fugitive release of particulate matter from delivery, treatment and loading	Atmosphere	Local human population	Harm to human health, respiratory irritation and illness	Medium	Medium	Medium	Permitted waste types do not include dusts, powders or loose fibres.	All non-hazardous waste to be deposited and treated on impermeable concrete. Speed restrictions on site. Visual inspection of dust on a daily basis. Daily cleaning of site. Entire site is concreted.	Low
Fugitive release of particulate matter from delivery, treatment and loading	Atmosphere	Local Air Quality	Harm to human health, respiratory irritation and illness	Medium	Medium-High	Medium-High	Site is not within an Air Quality Management Area.	As above.	Low

Source	Pathway	Receptor	Harm	Probability of exposure	Consequence	Magnitude of Risk	Justification	Risk Management	Residual Risk
Fugitive release of particulate matter from delivery, treatment and loading	Atmosphere	Local human population	Dust annoyance on cars and windows of residential properties and/or adjoining businesses	Medium	Medium	Medium	Local residents and businesses may be sensitive to dust. Nearest residents are over 500m from the site and located upwind.	As above.	Low
Fugitive emissions to water	Water runoff to surface water	Ground	Harm to surface water quality	Low	Medium	Medium	<p>No direct discharges to adjoining water courses.</p> <p>The permitted wastes do not include liquids. Impermeable concrete base and sealed drainage system in place.</p>	<p>Daily checks to ensure concrete remains intact weekly checks of drainage system. Contractor will be used to empty the interceptor tank for cleaning tank when full. Arrangements will be made on expiration of 6 months</p> <p>Spillage procedure. Any fuels will be stored in accordance with Oil Storage Regulations.</p>	Low

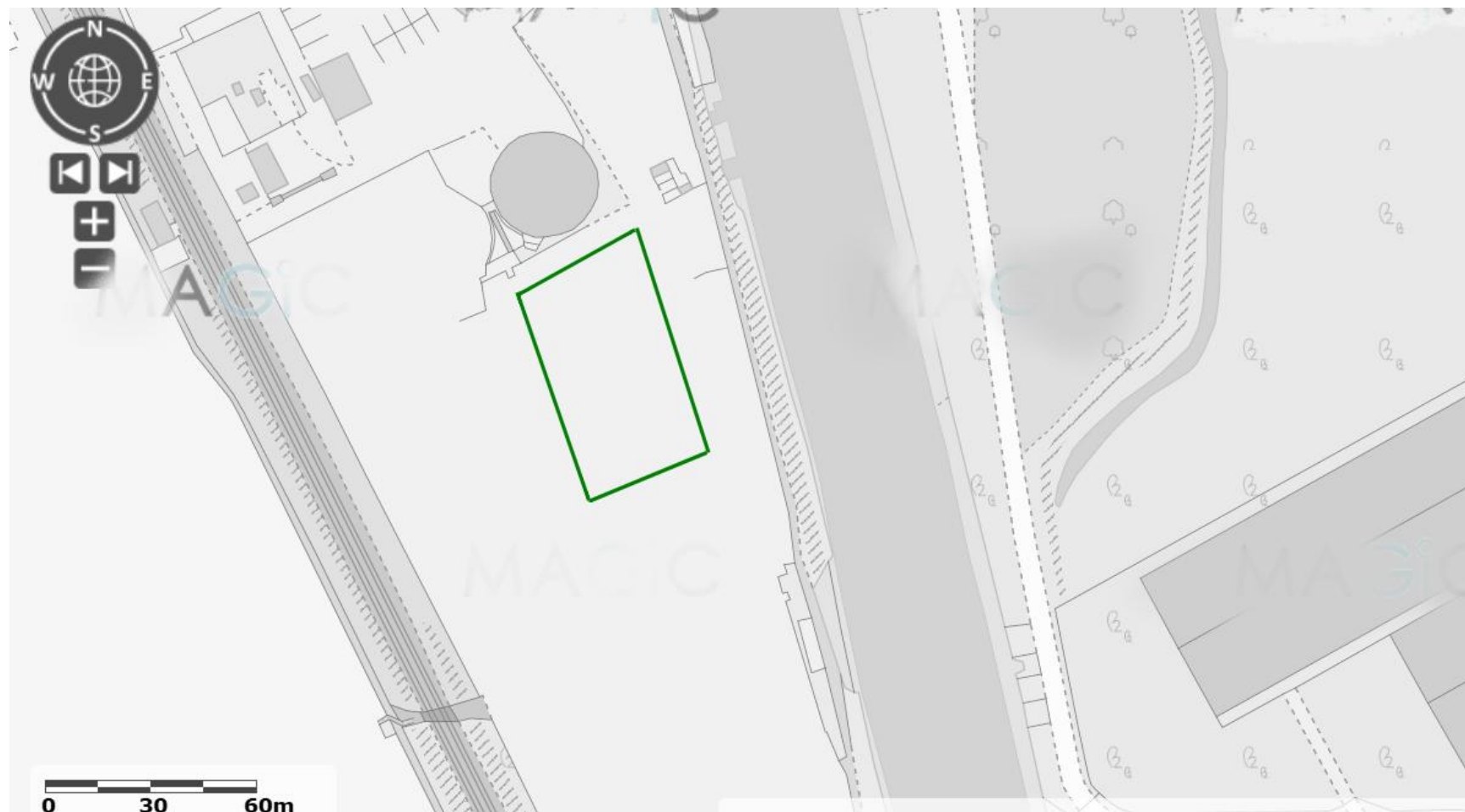
Source	Pathway	Receptor	Harm	Probability of exposure	Consequence	Magnitude of Risk	Justification	Risk Management	Residual Risk
Fugitive emissions to water	Water runoff to ground	Groundwater (not sensitive)	Harm to groundwater quality	Low	Low	Low	The permitted wastes do not include liquids.	As above	Low
Noise from plant and machinery	Atmosphere	Local human population	Nuisance to neighbours	Low	Low	Low	Nearest residents are over 500m from site. Operation is located within an industrial estate which has established industrial use.	All plant and machinery to be maintained in accordance with manufacturers specifications Complaint's procedure is in place. Distance and intervening topography will minimise any direct noise impact.	Low
Odour	Atmosphere	Local human population	Nuisance to neighbours	Medium	Low	Low - Medium	Some waste may be odorous but is managed on a continuous basis. Nearest residents are over 500m from site.	Regular cleaning of site. Any odorous waste will be containerized and arrangements made to move off-site. Daily Site checks.	Very Low
Pests, Vermin, Birds	Atmosphere	Local human population	Nuisance to neighbours	Low	Low	Low	Waste types unlikely to attract pests, vermin and birds	Daily Site Inspections. Commission Pest Control Contractor if necessary.	Low

Source	Pathway	Receptor	Harm	Probability of exposure	Consequence	Magnitude of Risk	Justification	Risk Management	Residual Risk
Litter	Atmosphere	Local human population	Nuisance to neighbours	Low	Low	Low	The incoming loads could contain lightweight wastes	<p>Waste reception and treatment will cease at the discretion of the site manager should wind conditions prove litter retention measures ineffective.</p> <p>Vehicles carrying waste will be sheeted when arriving and leaving the site. Treatment will cease if conditions cause entrainment of litter from site.</p> <p>Implement litter picking duties.</p>	Low
Mud on Road	Tracked on vehicle wheels	Local human population	Nuisance to neighbours	Medium	Medium	Medium	Local businesses may be sensitive to mud on road.	<p>All vehicles to be checked before leaving the site.</p> <p>Good marshalling of delivery vehicles will serve to keep wheels free of mud. Manual washing of wheels at the point of egress will be considered if existing measures fail to prevent mud leaving the site.</p> <p>Deploy road sweeper continuously during wet weather conditions if required.</p>	Low

Source	Pathway	Receptor	Harm	Probability of exposure	Consequence	Magnitude of Risk	Justification	Risk Management	Residual Risk
Dust	Atmosphere	Local human population	Harm to habitat and species	Low	Low	Low	<p>Good management techniques in place to prevent dust generation. Prevailing wind direction is SW.</p> <p>No unmade ground within the facility all surfaces are concrete.</p>	<p>Treated waste will be stored externally in bays.</p> <p>Hard standing areas are all constructed of concrete which is maintained free of dust and debris.</p> <p>Vehicles carrying waste will be sheeted when arriving and leaving the site.</p> <p>Daily Site Inspections</p> <p>Cleaning stations are positioned around the site.</p> <p>Continuous dampening down of the operational area during dry conditions.</p>	Low

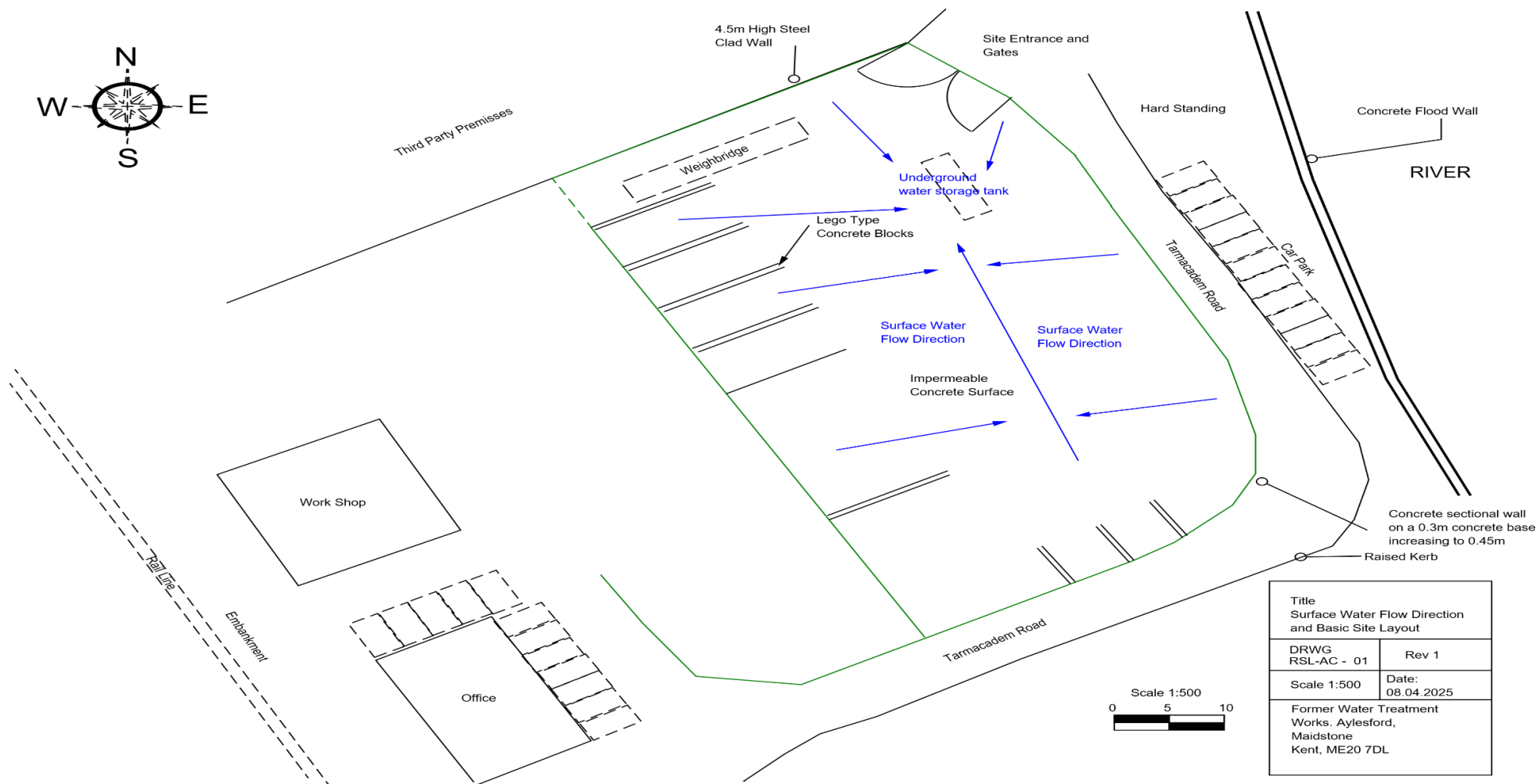
Roadstone Limited	Operating Procedures		
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## APPENDIX B: PERMIT BOUNDARY



Roadstone Limited		Operating Procedures	
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# APPENDIX C: SITE LAYOUT PLAN







<b>Operating Procedures</b>		
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## APPENDIX E: EMERGENCY CONTACT LIST

Site Details			
Name	Roadstone solutions Limited		
Location	Unit 5 Invicta Park, New Hythe Lane, Larkfield, Aylesford, Kent,		
Post Code	ME20 7FG		
NGR	TQ 71565 59431		
Site Contact	Name	Office hours Mobile	Out of Hours Mobile
Director	TBC		
Site Manager	TBC		
Site Supervisor	TBC		
Security	TBC		
Emergency Services		Office hours	Out of Hours
Emergency (Fire, Police and Ambulance)		999	999
Maidstone and Tunbridge Wells NHS Trust Hospital, Hermitage Lane, Maidstone, Kent, ME16 9QQ		01622729000	01622729000
Maidstone Police station: Palace Ave, Maidstone, Kent, ME15 6NF.		01622 690690	01622 690690

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Regulators		
Health and Safety Authority (HSE)	0151 922 9235	0151 922 9235
Environment Agency	020 8474 6767	03708 506 506
Local Authority (Maidstone Borough Council Council)	01622 602000	01622 602000
Environment Agency (emergency)	0800 80 70 60	0800 80 70 60
Maintenance Services	Provider	Contact number
Fuel supplier	Multiple providers	Multiple providers
Electrician		
Drainage contractor		
Liquid Waste Removal		
Utilities		

#### **EMERGENCY PREPAREDNESS CONTACT E-MAIL/WEBSITES**

**Meteorological Office**      Weather Warning  
[http://www.metoffice.gov.uk/weather/uk/uk\\_forecast\\_warnings.html](http://www.metoffice.gov.uk/weather/uk/uk_forecast_warnings.html)

**Environment Agency**      River Flood Warning    <http://www.environment-agency.gov.uk/subjects/flood/floodwarning>

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## APPENDIX F: ACCIDENT MANAGEMENT PLAN

All Accidents / incidents are categorised as follows:

- A. Personal Injury
- B. Fire or Explosion
- C. Liquid spillage / release of fumes
- D. Damage to property
- E. Unauthorised waste delivery

### Category A

- Raise the Alarm
- Summon emergency services as appropriate
- Evacuate the area to allow emergency services access to the casualty
- Summon location first aider to administer first aid as appropriate
- Wait with casualty and hand over control to emergency services
- Advise site manager accordingly

### Category B

- Raise the alarm
- Summon emergency services as appropriate
- Evacuate the area to allow the emergency services access
- Advise the site manager
- Evacuate all personnel to the assembly point
- Use appropriate fire extinguishers, etc. if safe to do so
- Advise the Environment Agency

### Category C

- Raise the Alarm
- Summon emergency services if necessary
- Evacuate the area to prevent contamination
- Advise the site manager
- Wear appropriate PPE
- Contain liquid spills using suitable materials / spill kits
- Wet down dust or fibrous spills with water
- Advise the Environment Agency

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#### Category D

- Advise the site manager
- Identify persons / property involved
- Identify witnesses

#### Category E

- Follow the rejected load procedure.

### **First Aid Procedures**

- 1. A person/persons will be appointed by the company who is trained to administer first aid to casualties should the need arise. All employees will be made aware of the name of the first aider and where they are located on site. A named photo is kept in the site office prominently positioned on the notice board.*
- 2 First aid kits are located in the following points:*
  - o Site office*
- 3 Items used from the first aid kits will not be returned but appropriately disposed of and the site first aider / manager informed.*
- 4 In the event of an accident, injury or illness the first aider will be asked to attend the casualty and administer first aid if required.*
- 5 All work activities in the area of the casualty must cease until the casualty is removed or the incident closed.*
- 6 If the injury or illness is considered serious, then the priority will be to call the emergency services by telephoning 999. A member of staff will be appointed to stand by the site entrance and direct the emergency services to the casualty.*
- 7 All accidents and injuries must be recorded in the accident book which is located in the site office.*
- 8 All accidents must be reported to the site manager / TCM who will assess the situation to establish if the occurrence is subject to R.I.D.D.O.R.*
- 9 All accidents / incidents will be investigated, and measures implemented to prevent reoccurrence if necessary.*

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## APPENDIX G: WASTE CATERGORIES, QUANTATIES AND OPERATIONS

Table S2.1 Permitted waste types and quantities for household, commercial and industrial waste transfer station	
Maximum quantity	The total quantity of waste accepted at the site for the above activity shall be less than 200,000 tonnes a year.
Exclusions	wastes having any of the following characteristics shall not be accepted: <ul style="list-style-type: none"> <li>Consisting solely or mainly of dusts, powders or loose fibres</li> <li>Wastes that are in a form which is either sludge or liquid</li> </ul>
Waste code	Description
15	Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified
15 01	packaging (including separately collected municipal packaging waste)
15 01 01	paper and cardboard packaging
15 01 02	plastic packaging
15 01 03	wooden packaging
15 01 04	metallic packaging
15 01 05	composite packaging
15 01 06	mixed packaging
15 01 07	glass packaging
15 01 09	textile packaging
17	construction and demolition wastes (including excavated soil from contaminated sites)
17 01	concrete, bricks, tiles and ceramics
17 01 01	concrete
17 01 02	bricks
17 01 03	tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02	wood, glass and plastic
17 02 01	wood
17 02 02	glass
17 02 03	plastic
17 03	bituminous mixtures, coal tar and tarred products
17 03 02	bituminous mixtures other than those mentioned in 17 03 01
17 04	metals (including their alloys)
17 04 01	copper, bronze, brass
17 04 02	aluminium

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17 04 03	lead		
17 04 04	zinc		
17 04 05	iron and steel		
17 04 06	tin		
17 04 07	mixed metals		
17 04 11	cables other than those mentioned in 17 04 10		
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil		
17 05 04	soil and stones other than those mentioned in 17 05 03		
17 05 08	track ballast other than those mentioned in 17 05 07		
17 06	Insulation materials and asbestos – containing construction materials		
17 06 04	insulation materials other than those mentioned in 17 06 01 and 17 06 03		
17 09	other construction and demolition wastes		
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03		
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTEWATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE		
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified		
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11		
20	municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions		
20 01	separately collected fractions (except 15 01)		
20 01 01	paper and cardboard		
20 01 02	glass		
20 01 10	clothes		
20 01 11	textiles		
20 01 38	wood other than that mentioned in 20 01 37		
20 01 39	plastics		
20 01 40	metals		
20 02	garden and park wastes (including cemetery waste)		
20 02 01	biodegradable waste		
20 02 02	Soil and stone		
20 02 03	other non-biodegradable wastes		
20 03	Other municipal waste		
20 03 01	mixed municipal waste		

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Table S2.1 Permitted waste types and quantities for Physical treatment of non-hazardous waste- General household, commercial and industrial waste	
Exclusions	<p>wastes having any of the following characteristics shall not be accepted:</p> <ul style="list-style-type: none"> <li>Consisting solely or mainly of dusts, powders or loose fibres</li> <li>Wastes that are in a form which is either sludge or liquid</li> </ul>
Waste code	Description
15	Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified
15 01	packaging (including separately collected municipal packaging waste)
15 01 01	paper and cardboard packaging
15 01 02	plastic packaging
15 01 03	wooden packaging
15 01 04	metallic packaging
15 01 05	composite packaging
15 01 06	mixed packaging
15 01 07	glass packaging
15 01 09	textile packaging
17	construction and demolition wastes (including excavated soil from contaminated sites)
17 02	wood, glass and plastic
17 02 01	wood
17 02 03	plastic
17 04	metals (including their alloys)
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 07	mixed metals
17 04 11	cables other than those mentioned in 17 04 10
17 06	Insulation materials and asbestos – containing construction materials
17 06 04	insulation materials other than those mentioned in 17 06 01 and 17 06 03
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTEWATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE
19 12	wastes from the mechanical treatment of waste (for

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	example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11
20	municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions
20 01	separately collected fractions (except 15 01)
20 01 01	paper and cardboard
20 01 02	glass
20 01 10	clothes
20 01 11	textiles
20 01 38	wood other than that mentioned in 20 01 37
20 01 39	plastics
20 01 40	metals
20 02	garden and park wastes (including cemetery waste)
20 02 01	biodegradable waste
20 02 02	Soil and stone
20 02 03	other non-biodegradable wastes
20 03	Other municipal waste
20 03 01	mixed municipal waste

Table S2.1 Permitted waste types and quantities for Physical treatment of non-hazardous waste- inert soil and hardcore waste	
Exclusions	wastes having any of the following characteristics shall not be accepted: <ul style="list-style-type: none"> <li>Consisting solely or mainly of dusts, powders or loose fibres</li> <li>Wastes that are in a form which is either sludge or liquid</li> </ul>
Waste code	Description
17	construction and demolition wastes (including excavated soil from contaminated sites)
17 01	concrete, bricks, tiles and ceramics
17 01 01	concrete
17 01 02	bricks
17 01 03	tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06



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17 02	wood, glass and plastic
17 02 02	glass
17 03	bituminous mixtures, coal tar and tarred products
17 03 02	bituminous mixtures other than those mentioned in 17 03 01
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	soil and stones other than those mentioned in 17 05 03
17 09	other construction and demolition wastes
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 0902 and 17 09 03
20 02	garden and park wastes (including cemetery waste)
20 02 02	Soil and stone

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## APPENDIX H: CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (C.O.S.H.H)

Using chemicals or other hazardous substances at work put peoples' health at risk, so the law requires employees to control exposure to hazardous substances to prevent ill health and harm. They must protect both employees and others who may be exposed by complying with the Control of Substances Hazardous to Health Regulations 2002 (COSHH) (as amended).

### **Hazardous Substances**

Hazardous substances include but not limited to:

- Substances used directly in work activities (e.g., adhesives, paints, cleaning products and solvents)
- Substances generated during work activities (e.g.) fumes from
- soldering and welding)
- Naturally occurring substances (e.g., dust)
- Biological agents such as bacteria and other micro-organisms
- Fuels and lubes used in refuelling and maintaining plant and machinery.

What COSHH requires (to comply with COSHH the following steps will be taken).

- Step 1 Assess the risk.
- Step 2 Decide what precautions are required.
- Step 3 Prevent or adequately control exposure.
- Step 4 Ensure that control measures are used and maintained.
- Step 5 Monitor the exposure.
- Step 6 Carry out appropriate health surveillance.

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- Step 7 Prepare plans and procedures to deal with incidents, accidents, and emergencies.
- Step 8 Ensure employees are properly informed, trained, and supervised.

Employees at Roadstone Limited do not work with or are exposed to large quantities of hazardous substances. However, all products must be assessed and if found to be hazardous must be categorised and those potentially exposed to the substance trained and issued with appropriate PPE.

In the first instance, a data sheet must be obtained from the material supplier, this will then be assessed for compliance with the intended use.

Those potentially exposed to any substance will be trained by those appointed to do so by the company. A record of training will be kept on file.

All COSHH data and risk assessment sheets will be kept in a clearly marked file in the site office.

Regular Toolbox Talks will be undertaken to reinforce personal diligence of staff when dealing with potentially harmful substances.

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## APPENDIX I: PLANT MAINTENANCE PROCEDURE

**This site procedure is intended for plant operators and general operatives who use mobile plant during their duties at Roadstone Limited. It is intended to provide a guide for the minimum frequency of maintenance required and should not be considered exhaustive or replace the manufacturers recommendations for the maintenance of specific plant.**

It is the operator's responsibility to ensure that daily checks are carried out in accordance with the plant manual specific to the plant being used. The site supervisor or manager will ensure checks are undertaken as specified by the manufacturer's instruction and company procedures. Records of weekly checks will be kept in the site office for review if required.

### ***Pre-start-up check (mobile plant)***

Before using the waste handling equipment for the day, the following pre-start checks must be undertaken before work commences in addition to the plant maintenance check sheet requirements.

- All fluid levels
- Fan belt
- Loose components
- Trapped debris
- Battery is secure and free of waste build-up and compartment is clean

Should you suspect a fault with the equipment report the matter to the site supervisor or director immediately before using the equipment.

You must be aware that waste handling equipment can get hot, especially during hot weather and the risk of fire is greater under these conditions. Allow equipment to cool during break times or during periods of inactivity.

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### ***Checks throughout the day***

During hot dusty conditions waste handling equipment will require regular checks for trapped debris and clogging of the ventilated areas of the engine compartment. These need only be visual and brief to determine whether the equipment requires cleaning.

**REMEMBER; HYDRAULIC COMPONENTS SUCH AS RAMS WILL BECOME HOT UNDER OPERATING CONDITIONS.**

Equipment should be checked at least every four hours when operated constantly and less if conditions are hotter or dustier than normal.

- Dust suppression hoses should be in use if the above is prevalent.

Waste handling equipment should be stopped mid-morning and mid-afternoon if worked continuously and sensitive areas cleaned by compressed air to remove build-up of fine particles and debris. Radiators are particularly susceptible to clogging during dusty conditions.

Washing down of equipment should only be considered at the end of the working day or should concern over the safety of the equipment take precedence. *Reason being that wet components can attract fine particles and encourage clogging if not allowed to dry thoroughly before re-use.*

### ***Maintenance and repair programme***

In addition to pre-start up checks and routine maintenance as described previously, more detailed, and formal maintenance programme will be in effect and implemented at 500-hour intervals or on the expiration of 3 months whichever is sooner. Maintenance activities will conform to manufacturers recommendations which as a minimum shall include the following checks or replacement:

- Oil and filter change
- Fuel filter
- Air filter cleaning or change as required by the mechanic.
- Inspection for oil leaks, engine and hydraulic
- Inspection for damaged and potentially failing items

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### ***Reporting and records***

Daily check sheets will be completed by the plant / equipment operator, and it shall be the site supervisor or manager who shall ensure these are rigidly completed. Any and all items noted indicating a potential failure will be acted upon by the supervisor / director and arrangement details noted and signed for on the relevant maintenance sheet. Repairs completed will be closed out by the person responsible for conducting the work, whether this is internal or third-party contractor. A selection of parts shall be maintained on site that derive from a common list of items that routinely fail, such as hydraulic hoses.

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## APPENDIX J: MATERIALS REJECTION FORM

	Location	Activity
<b>Site Address:</b>		
<div></div> <div></div> <div></div>		
<b>Incoming Ticket Reference:</b>		
<div></div>		
<b>Date:</b>	<b>Time:</b>	
<div></div>	<div></div>	
<b>Haulier:</b>	<b>Vehicle Registration</b>	
<div></div>	<div></div>	
<b>Waste Type:</b>	<b>EWC Code:</b>	
<div></div>	<div></div>	
<b>Reason for Rejection:</b>		
<div></div> <div></div> <div></div>		

Site Representative Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Drivers Signature: \_\_\_\_\_ Date: \_\_\_\_\_

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## APPENDIX K: DAILY PLANT CHECK SHEET:

### Mobile Plant Maintenance Checklist

Machine No:		Machine Make	
Machine Hours		Model	
Week start hours		Serial No:	
Weekend hours			

The following checks must be carried out daily, BEFORE starting up.

Daily Check	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Wheels & Tyre Damage						
Battery Condition & Security						
Security of Grab / Bucket / Forks						
check around machine for leaks						
Arms & booms						
Access (step damage)						
Operation of brakes						
windows (report if broken)						
Body panels / seat						
flashing beacon & lights						
Engine oil level						
Hydraulic oil levels						
Coolant level						
Operation of all gauges						
Condition of hydraulic pipes						
Grease points daily (check auto grease level)						

Mark 'tick' if checked and OK;  
 Mark 'X' if checked and defect found;  
 Mark 'N/A' if not checked.

Week Commencing	
-----------------	--

Machine:	
----------	--



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The following checks are to be carried out daily before starting up.

Checked by (Initial)						
Item Checked	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Housekeeping						
Belt condition						
Guards (in place / undamaged)						
Greased points						
Control panel (all working)						
General Damage						
Other						

Comments:

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# APPENDIX L: COMPLAINTS RECORD

<b>Date Received:</b>	<b>Time Received:</b>
-----------------------	-----------------------

<b>Complainant:</b>
---------------------

<b>Complainant Contact Details:</b>
-------------------------------------

<b>Details of Complaint:</b>
------------------------------

<b>Details of Investigations:</b>
-----------------------------------

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**Was the Complaint Justified?**

**Action Taken:**

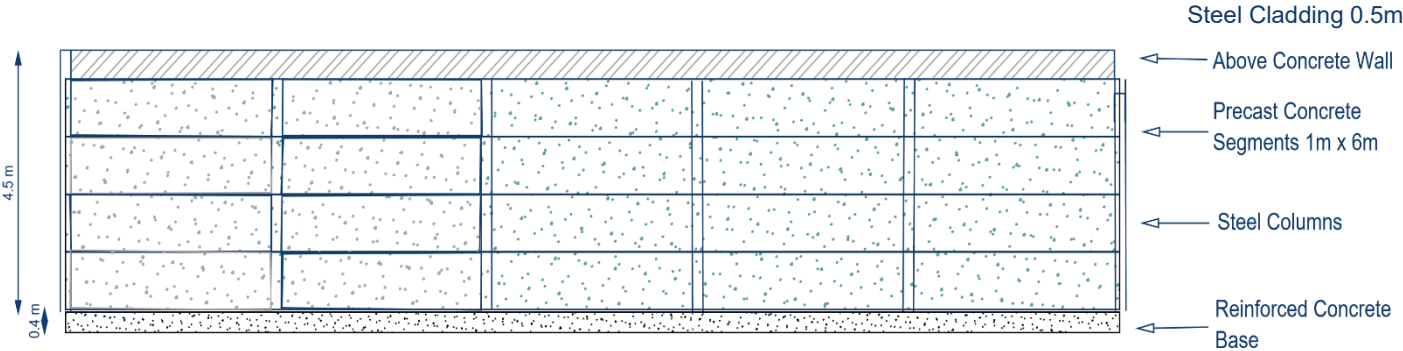
**Response Given to Complainant:**

**Form Completed By:**

**Date:**

Operating Procedures		
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APPENDIX M: PERIMETER WALL CONSTRUCTION



Side View of Perimeter Wall

KEY

Drawing Title: Perimeter Wall Construction

Date: July 2024

Drawing Reference RSL-AC-01-2024

Scale: 1:500

02610

M

Roadstone Limited,

Unit 5 Invicta Park,

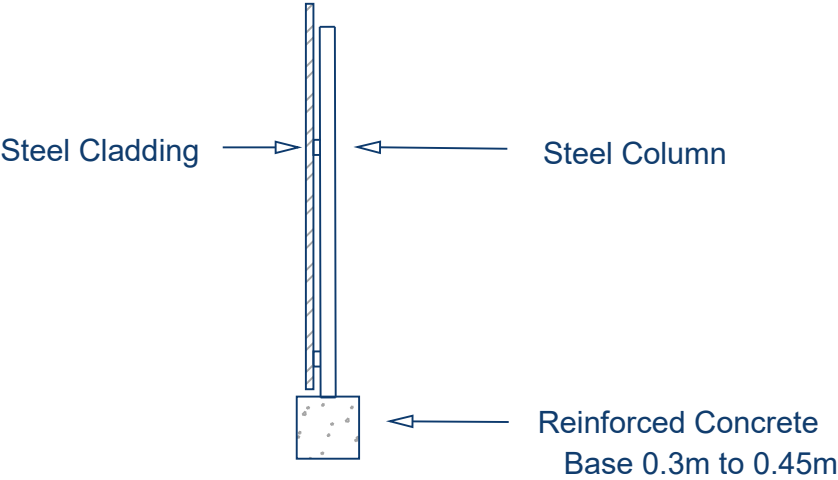
New Hythe Lane,

Larkfield

Aylesford, Maidstone,

Kent,

ME20 7FG



End View of Perimeter Wall

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# APPENDIX N: SENSITIVE RECEPTORS SCREENING REPORT

## Nature and Heritage Conservation

Screening Report: Bespoke Waste

Reference	EPR/LP3428LU/P001
NGR	TQ 71565 59431
Buffer (m)	20
Date report produced	23/04/2025
Number of maps enclosed	1

### This nature and heritage conservation report

The nature and heritage conservation sites, protected species and habitats, and other features identified in the table below **must be considered in your application**.

In the further information column, there are links which give more information about the site or feature type and indicate where you are able to self-serve to get the most accurate site boundaries or feature locations.

Most designated site boundaries are available on [Magic map](#). Using Magic map allows you to zoom in and see the site boundary or feature location in detail, Magic map also allows you to measure the distance from these sites and features to your proposed boundary. [Help videos](#) are available on Magic map to guide you through.

Where information is not publicly available, or is only available to those with GIS access, we have provided a map at the end of this report.

Sites and Features within screening distance	Screening distance (m)	Further Information
Marine Conservation Zone (MCZ)	1000	<a href="#">Joint Nature Conservation Committee</a> and <a href="#">Magic map</a>
Medway Estuary - Zone 2		
Sites of Special Scientific Interest (SSSI)	1000	<a href="#">Natural England</a> and <a href="#">Magic map</a>
Holborough to Burham Marshes (SSSI)		

Reference: Bespoke waste screen

Version: 6.0

Security Marking: OFFICIAL

Page 1 of 2

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### Protected Species within screening distance

**Protected Species - Allis Shad migratory route**

**Protected Species - European Eel migratory route**

**Protected Species - River Lamprey migratory route**

**Protected Species - Sea Lamprey migratory route**

**Protected Species - Smelt migratory route**

### Screening distance (m)

up to 500m

### Further Information

[Natural England](#)

[Appropriate Local Record Centre \(LRC\)](#)

[National Biological Network \(NBN\)](#)

Environment Agency. Dial 03708 506 506 for your local Fisheries and Biodiversity team

Where protected species are present, a licence may be required from [Natural England](#) to handle the species or undertake the proposed works.

**The following nature and heritage conservation sites, protected species and habitats, and other features have been checked for, where they are relevant for the permit type requested, but have not been found within screening distance of your site unless included in the list above.**

Special Areas of Conservation (cSAC or SAC), Special Protection Area (pSPA or SPA), Marine Conservation Zone (MCZ), Ramsar, Sites of Special Scientific Interest (SSSI), National Nature Reserve (NNR), Local Nature Reserve (LNR), Local Wildlife Sites (LWS), Ancient Woodland, relevant species and habitats.

**Please note** we have screened this application for features for which we have information. It is however your responsibility to comply with all environmental and planning legislation, this information does not imply that no other checks or permissions will be required.

The nature and heritage screening we have conducted as part of this report is subject to change as it is based on data we hold at the time it is generated. We cannot guarantee there will be no changes to our screening data between the date of this report and the submission of the permit application, which could result in the return of an application or requesting further information

# Operating Procedures

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11/2025


## Protected Species

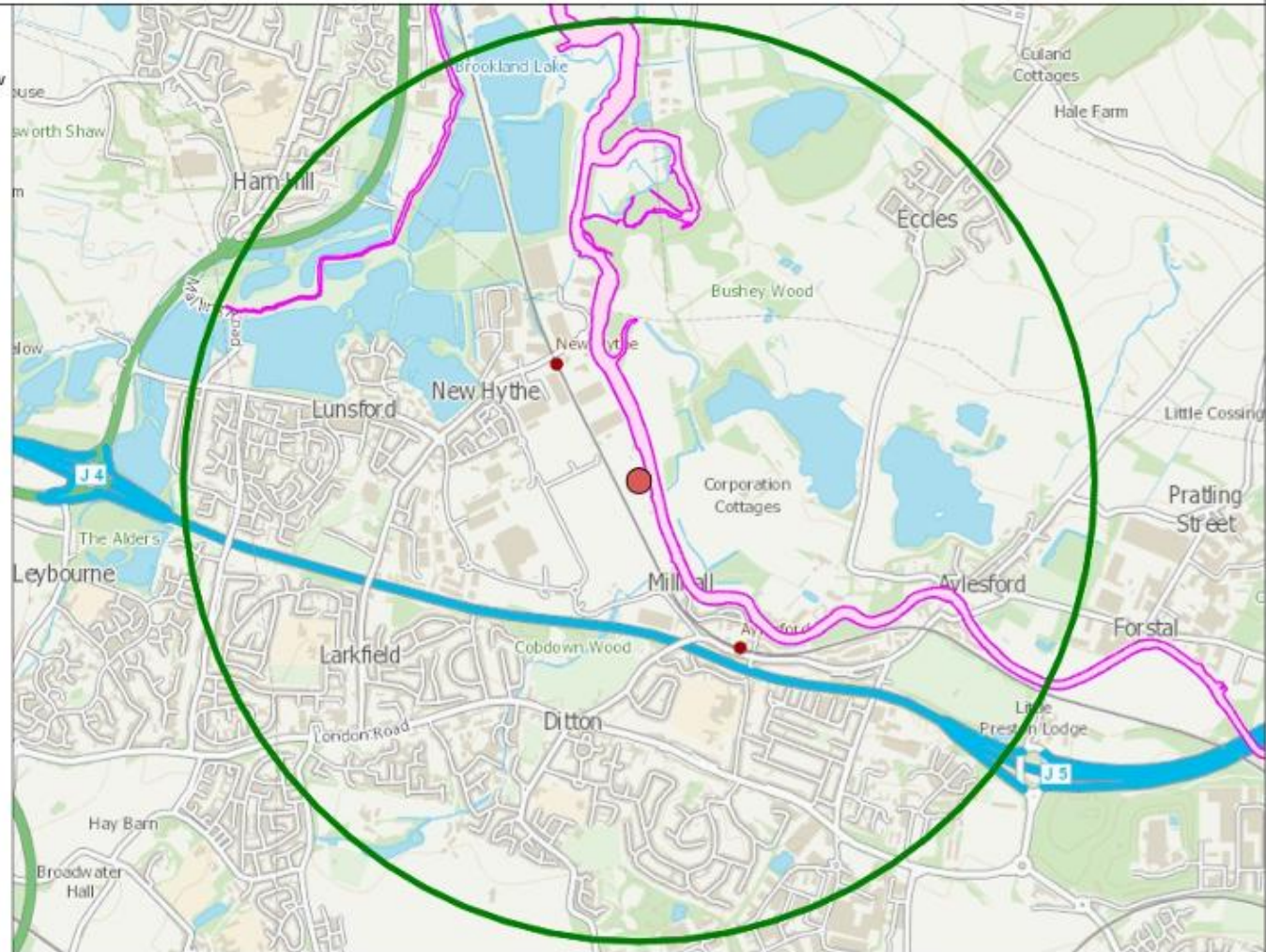


### Legend

Protected species screened for Env  
Permits - complete set

-  Protected species, non fish
-  Protected fish
-  Protected fish migratory route
-  Coded

 Fish migratory routes screened for  
Environmental Permits



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			<b>Operating Procedures</b>
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## APPENDIX O: SAMPLING PLAN FOR WASTE CLASSIFICATION AND ASSESSMENT

SAMPLING PLAN FOR WASTE CLASSIFICATION AND ASSESSMENT	
Preparatory steps	
<b>Involved parties:</b> A Coleman: Consultant TBC: Operations manager Waste producer: Various Regulator: Environment Agency Laboratory: TBC	
<b>Objectives :</b> To determine the potentially hazardous nature of waste emanating from Roadstone Limited.	<b>Technical goals:</b> To obtain sufficient information on the nature, composition and properties of the waste to determine if it is hazardous waste and to assign appropriate EWC codes from the LoW.
<b>Background information researched.</b>  <p>WAC analysis will be undertaken on outputs (population) from the transfer station in order to meet duty of care requirements if disposal at landfill is required. Waste acceptance procedures will be in place to determine the suitability of inputs pursuant to the site permit and 1990 Environmental Protection Act (Duty of Care). A significant percentage of waste entering the site will derive from individual premises such as small works and housing developments.</p> <p>Direct deliveries will derive from a number of sources, parks and gardens, construction and demolition, making the waste mix heterogenous in nature and composition.</p> <p>All inputs will come from sources with pre-approved waste streams.</p>	



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Upholstered waste will not be accepted to site due to the known presence of PoP's which prevents the landfilling and recycling of such wastes and requires incineration as the sole disposal operation.

This hazardous waste classification plan is designed to assist the operator to determine the hazardous nature of the waste they produce and through the process set out in this document provide stakeholders with the confidence that the requirements of WM3 have been followed.

Focus is given to mirror entry codes from the List of Wastes (LoW) presented in the Agency's technical guidance document WM3.

#### **Site details.**

- Site operator and permit holder.  
Roadstone Limited  
Unit 5 Invicta Park,  
New Hythe Lane,  
Larkfield,  
Aylesford,  
Kent,  
ME20 7FG
- Permit number.  
TBC

#### **Process Or Nature of Arising**

- Treatment of non-hazardous industrial, commercial, construction and demolition wastes

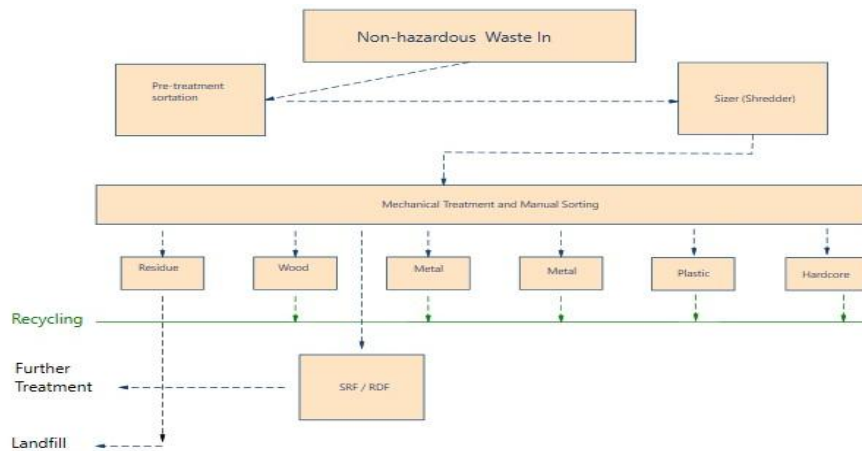
#### **Type, Form and Amount of Material**

Non-hazardous waste only consisting of the following.

- Mixed construction and demolition generally containing brick, wood, plastic, paper/card and soil
- Construction waste consisting of; brick, concrete, ceramics, glass and soil
- Wood
- Mixed general waste of; paper/card, wood, plastic, metal and film

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## Waste Treatment Organogram



## Process or nature of arising.

- Waste arisings will be predominantly trommel fines derived from treatment of non-hazardous hardcore conforming to group 1 and 2 types
- Known physical, biological or chemical characteristics.
  - The physical composition of the waste forming the population to be sampled may be briefly summarised as; soil containing small fragments of glass, ceramics and brick material with an average moisture content <10% and particle size <20mm
  - The chemical properties must be determined by analysis to provide basis characterisation of the population.
  - Operational procedures that may affect characteristics.
  - Treatment activities will include, mechanical and manual sorting, mechanical shredding, screening, sorting and crushing

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- Initial sorting will be by mobile plant followed by mechanical and manual treatment and finally mobile plant to complete the loading and export process
- The dimensions of the waste will be subject to mechanical reduction to facilitate throughput of the materials recovery plant. Sorting of waste types will arise though the recovery cycle leaving a residue commonly referred to as trommel fines
- Handling and rehandling of the material to be tested increases the incidence and variability of results, therefore movement of the population or sub-population should be kept to a minimum
- Mobile plant may contaminate the population by releasing liquids likely to elevate the presence of hydrocarbons and in such known incidences temporal sampling should be undertaken over a specified number of days to account for the unknown variability
- Previous investigations or analysis.
- Basic ad-hoc compliance testing will be undertaken to determine the composition of the waste, concentration of components and hazardous properties, to select the category of landfill able to accept waste arisings, if the chosen route of disposal is landfill. WAC is not required for waste disposal other than landfill.
- Waste acceptance procedures must be in place for each waste stream accepted and pre-delivery discussions must take place with the producer / haulier to ascertain the nature of the arising, historic use, process nature and composition
- Waste information forms (WIF) will be used to ascertain source details of the waste prior to arriving on site for quantities no greater than 10 loads.

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- It is acknowledged that small scale projects are often subject to manual calculations of quantities and on-site variations to plans may differ during excavation, therefore it is suggested that should the total quantity exceed 10 loads by 20% and that Roadstone Limited are confident that the additional material is from the same source and the legitimacy of the addition is substantiated, extra loads may be accepted.
- For quantities greater than 10 loads, notwithstanding the above, a chemical analysis is required and the details construed by a suitably disciplined third party organisation.

A waste classification and assessment procedure are required to correctly classify the waste in accordance with Environment Agency guidance document WM3. To this end the following steps should be considered:

***Steps to classify the waste.***

- 1. check if the waste needs to be classified*
- 2. identify the code or codes that may apply to the waste*
- 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<sup>1</sup>*

<sup>1</sup> Environment Agency guidance document WM3, Waste classification and assessment procedure.

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### **Determine level of testing required:**

The testing level is the type(s) and frequency of investigation required to meet the technical goals and deliver the objective. This is largely determined by how much information we have, and how much is unknown.

The primary function of Roadstone Limited will be recovery of materials suitable for reuse pursuant to the waste hierarchy and therefore disposal to incineration or landfill is to be avoided, however, if such an option was pursued, a WAC assessment would be undertaken to select the category of landfill able to accept waste arisings, if this is chosen route of disposal. WAC is not required for waste disposal other than landfill.

To rely solely on basic characterisation testing of the overall population will not be considered appropriate due the heterogeneity of the feed stock, therefore routine compliance testing to compare hazardous substances against hazardous waste thresholds is required.

Generic historic sampling has identified components and set parameters that require specified testing, heavy metals, asbestos, POP's and hydrocarbons, and provides evidence of the impact of the various factors identified (from differences in input materials from different producers to heterogeneity of treated residues and identification of sub-populations.

To determine the frequency of testing known factors must be taken into consideration and unknown variabilities of the origins of the feed stock.

- Absence of historic basic characterisation and initial investigation of the waste influence support development of a compliance testing programme
- Heterogeneity of the feed stock precludes assumptions of the components present, leaving reliance on external reviews and documentation to provide base line analysis requirements

Routine compliance sampling is required to establish concentrations of hazardous substances against hazardous waste thresholds. A method of gaining a representative sample of the population must be established in order to promote validity and confidence that the waste is non-hazardous.

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### **Constituents to be tested:**

Periodic compliance testing will identify the key constituents present within the population and those having the potential to exceed hazardous waste thresholds. Therefore, compliance testing will focus on these components of the population. Heavy metals, asbestos, PoP's(1) and hydrocarbons,

In conjunction with the parameters stated above, reference to the Environment Agency report "Trommel Fines: Chemical Analysis and Waste Classification" has been used to underline the parameters selected from basic characterisation sampling.

C6-C8 TPH Band 3 mg/kg  
 >C8-C10 TPH Band 3 mg/kg  
 >C10-12 TPH Band 3 mg/kg  
 >C12-16 TPH Band 3 mg/kg  
 >C16-21 TPH Band 3 mg/kg  
 >C21-35 TPH Band 3 mg/kg  
 Naphthalene 3 mg/kg  
 Acenaphthylene 3 mg/kg 1  
 Acenaphthene 3 mg/kg  
 Fluorene 3 mg/kg  
 Phenanthrene 3 mg/kg  
 Anthracene 3 mg/kg  
 Fluoranthene 3 mg/kg  
 Pyrene 3 mg/kg  
 Benzo(a)anthracene 3 mg/kg  
 Chrysene 3 mg/kg  
 Benzo(b)fluoranthene 3 mg/kg  
 Benzo(a)pyrene 3 mg/kg  
 Indeno(1,2,3-cd)pyrene 3 mg/kg  
 Dibenzo(ah)anthracene 3 mg/kg  
 Arsenic 3 mg/kg  
 Cadmium 3 mg/kg  
 Chromium 3 mg/kg  
 Copper 3 mg/kg  
 Lead 3 mg/kg  
 Mercury 3 mg/kg  
 Nickel 3 mg/kg

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Selenium 3 mg/kg  
Zinc 3 mg/kg  
pH 3 pH units  
Total Sulphate  
Asbestos Screen

### **Determine Level of Testing Required:**

The testing level is the type(s) and frequency of investigation required to meet the technical goals and deliver the objective. This is largely determined by how much information we have, and how much is unknown.

Basic characterisation testing of the overall population is not considered appropriate due the heterogeneity of the feed stock, therefore frequent compliance testing to compare hazardous substances against hazardous waste thresholds is required.

Potential hazardous substances such as heavy metals, asbestos, hydrocarbons and POP's are known to be present in wastes arising from treatment of industrial, commercial and demolition wastes. These components were documented by the Environment Agency "Hazardous Waste Data and Investigation Team" during 2020 national review of non-hazardous treatment facilities.

The results of the national review are not replicated here but are used as evidence of potential hazardous substances and provides evidence of the impact of the various factors identified (from differences in input materials from different producers to heterogeneity of treated residues and identification of sub-populations.

Initial sampling frequency is suggested over a period of two weeks to gain a minimum of 5 samples in order to begin characterisation of the waste following which a review of data will be undertaken to establish the mean concentrations of hazardous substances in the output population from the treatment process. Once sufficient samples are obtained (minimum of 5 samples) to complete the initial characterisation and outliers are incidental without forming a pattern or trend, the sampling frequency may reduce to monthly for a period of 3 months.

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At the expiration of 3 months a review of sampling frequency will be determined by the level and confidence of data gathered during the sampling period. The sampling frequency will revert to quarterly if the results confirm the components of the output population are consistently below hazardous waste thresholds.

Conversely, if during the sampling period a breach of hazardous waste thresholds is evident, sampling will continue at monthly intervals and the site operator will conduct an investigation into the components of feedstock, comparing these against hazardous waste thresholds. Close liaison with the waste producer will ensue to establish background information. For feedstock emanating from a producer's treatment and transfer station it will be necessary for the operator to conduct their own investigation and provide confirmation that hazardous waste assessments have been carried out and the findings conclude their waste is non-hazardous in composition.

#### **Health and safety precautions, and access restrictions:**

A separate procedure is required for physical sampling of waste outputs and therefore falls outside of the intended scope of this document. Roadstone Limited will have internal health and safety procedures in place to cover the activities they perform on site, and it is the site H&S representative to ensure physical sampling is undertaken in accordance with relevant site protocols.

#### **Technical Goals**

Define

- populations, and
- subpopulations

The population / subpopulation to be sampled is trommel fines typically derived from a combination of waste streams and represents the small fraction deemed to have attained "end of use" status. Heterogeneous in nature due to the wide variety of feed stock and unknown characteristics.



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<p>(1) POP's testing will be undertaken on wastes known to be associated with WEEE waste.</p>	<p>Usually dark brown in colour, visually a soil containing small particles of glass, ceramics, stone and fibre.</p> <p>The population is the total output of trommel fines from the materials processing equipment over a specified period of time, in this case, one month.</p> <p>Subpopulation are batches selected for sampling at unspecified times during the sampling period. Batches will be defined as a given quantity equal to one vehicle load (scale) that consistently emanates from the plant.</p> <p>The term, overall population, relates to the output of homogeneous material from the treatment process and relies on consistent feed stock with minimal variability and comprehensive knowledge of origins.</p> <p>The circumstances from which the trommel fines derive require a more decisive testing programme due to the heterogeneous nature of the feed stock and limited knowledge of the origins.</p> <p>It's therefore appropriate that the population is broken down to subpopulations and the sampling regime focuses on these.</p>
<p>Variability and causes:</p> <ul style="list-style-type: none"> <li>• spatial,</li> <li>• temporal</li> </ul>	<p>The variability of feed stock can derive from a number of causes, such as:</p> <ul style="list-style-type: none"> <li>• Variations of the feeds stock entering the producer's facility</li> </ul>

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	<ul style="list-style-type: none"> <li>• New entrant or waste mix entering Roadstone Limited</li> <li>• Changes to the treatment process and introduction of new technologies</li> </ul> <p>To a large extent the variability is understood as the waste mix, although decisively heterogeneous, conforms to a known standard and components and is continually inspected before treatment for compliance.</p> <p>For the purpose of reliable sampling batches should be symbolized in the storage area and each considered as subpopulations.</p>
Scale of sampling	<p>The population produced by the treatment process is commonly in multiple batches commensurate with a vehicle size.</p> <p>Therefore, the scale must be defined as the vehicle load capacity.</p> <p>Each batch comprising the load (subpopulation) forms part of the sum produced during the sampling period (population).</p> <p>To avoid a risk of masking subpopulations, each batch will be subdivided to allow stratified probabilistic sampling.</p>

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Practical instructions and sampling methodology (CEN/TR 15310-1&2)	
Name and Organisation of sampler	Roadstone Limited
Other parties present during sampling (name and organisation)	
Statistical approach to be used	Not adopted
Sampling approach and pattern (including justification)	<p>The probabilistic approach to sampling is achievable by exposing the population to all round access, thus ensuring that all parts of the population have an equal chance of being sampled.</p> <p>The population to be sampled will be divided into subpopulations (4) to allow random samples to be taken. Each sample shall be formed of four increments to compose a single composite sample. Each increment shall be taken from an even spread of points from the subpopulation.</p>
Identify sampling place and points	<p>The populations to be sampled are located under the mechanical processing system. Conforming population is located directly opposite of the mechanical processing system, and they both are sited on an impermeable concrete base.</p> <p>To avoid the potential of cross contamination sampling will take place at the point of production/storage. Good access may be afforded by aid of the mechanical waste handler to subdivide the population for stratified sampling.</p>

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Sampling equipment needed		Sampling pots, bags, gloves, scoop and aid of site plant to subdivide the sample population. The item of plant should be checked before use to ensure the bucket is clean of contamination and that no fluid leaks are evident.	
Sampling equipment to be used		As above	
Sample details <ul style="list-style-type: none"><li>• individual or composite</li><li>• number of samples / increments</li><li>• size of samples / increments</li></ul>		The population shall be divided into six segments of roughly equal size. From each segment six increments shall be taken forming a single composite sample. Sufficient material will be collected to fill two 1kg pots	
Requirements for sample reduction		None	
Requirements for on-site determinations		TBC	
Sample ref. number methodology		TBC	
Anticipated restrictions or limitations that may impact on data reliability		None envisaged.	
Sub-sampling (CEN/TR 15310-3)			
Detail procedure used (if applicable)			
Packaging, preservation, storage, and transport requirements (CEN/TR 15310-4)			
Packaging (type, size, material considering risk of adsorption/reaction, cleaning etc.)		Unused 1kg plastic pots	
Preservation (samples shall be packed and transported in such a way that their condition at the time of sampling is preserved)		Samples shall be taken to the laboratory without undue delay, ideally on the day of sampling.	

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Storage		If samples are retained onsite before testing, they should be held in the manager's office for safe storage in a cooler box.	
Transport method		By road	
Transport company details: Contact: Delivery date:		Roadstone Limited	
Analytical laboratory		TBC	

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## Conclusion

Initial characterisation sampling and testing will be carried out over the course of one month, or less to culminate with 5 individual samples. A suitably accredited testing house must be used to undertake the assessment of samples and present the results in common terms to provide commentary on the performance of the determinands sampled. It is advised that upon approval of the this plan the site operator adopts the procedural methods stated herein and any deviation from the approved plan must be substantiated and documented.

If the results conclusively categorised the waste as non-hazardous in nature and no discernible adverse trends, routine sampling may be undertaken on a quarterly frequency on the proviso that all elements of this sampling plan are implemented and followed, and further characterisation sampling is undertaken upon variabilities being introduced into the waste treatment process.

In the event that initial characterisation identifies hazardous properties within the population sampled the site operator will conduct a thorough review of waste acceptance procedures as detailed in this plan and as required by operational management plans. Initial characterisation sampling will continue until 5 clear samples are obtained and a level of confidence concerning the constituents of the waste are evidenced.

Monthly sampling will then ensue for a period of 3 months during which the sampling results must continue to demonstrate the non-hazardous nature of the waste and incipient signs of adverse trends must be investigated.

Assuming the requirements of the aforesaid having been met, the sampling frequency may continue at quarterly intervals subject to the requirements of this plan.

If routine sampling identifies elevated levels of hazardous properties within the population sampled, the following procedure shall be adopted:

- Sampling frequency shall revert to monthly until three clear results have been obtained. Thereafter quarterly sampling shall resume.
- In the event that elevated levels of hazardous properties remain present during the monthly sampling period the operator shall conduct a thorough review of waste acceptance procedures, operational activities and surveillance of customer feed stock and implement all necessary protocols to reduce the concentration of hazardous substances in the waste to below the threshold

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- The requirements of this sampling plan shall be reviewed in full against site operations, waste feed stock and producer activities.
- On completion of each sampling event the operator shall complete a Sampling Log to record the appropriate details and provide traceability to this sampling plan

The person nominated to implement and manage the requirements of this sampling plan shall maintain a record of analytical results and monitor for incipient signs of an adverse trend and report their findings to the site manager / director as appropriate.

Adverse trends shall instigate a review of waste acceptance procedures, communication with waste producers and close inspection of waste at the point of deposit.

The operator is advised to request the laboratory to construe the results of analytical sampling in common terms to allow adoption of a practical approach commensurate with the findings of the sampling assessment. Ideally, the laboratory will provide commentary on the performance of the constituents present and their potential to impact confidence of the assessment programme.

This hazardous waste classification plan must be reviewed by the operator relevant to legislative updates and RPS revision.

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## Interpretation.

“Hazardous substance” means a substance classified as hazardous as a consequence of fulfilling the criteria laid down in parts 2 to 5 of Annex I to Regulation (EC) No 1272/2008.

“List of Wastes” means the list of wastes established by Commission Decision 2000/532/EC replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste, as amended from time to time.

“Waste code” means the six digit code referable to a type of waste in accordance with the List of Wastes and in relation to hazardous waste, includes the asterisk.

“Heavy metal” means any compound of antimony, arsenic, cadmium, chromium (VI), copper, lead, mercury, nickel, selenium, tellurium, thallium and tin, as well as these materials in metallic form, as far as these are classified as hazardous substances.

“Population” waste derived from the treatment plant that requires sampling to determine its hazardous nature, primarily fines.

“Sub-population” term used to describe derivatives from the main population. E.g. unsuitable material recovered from the fine s clean up plant.

“Overall Population” is the lifetime output from the treatment plant from which populations are derived.

“Heterogeneous” variable quality waste mix from multiple sources and waste types

“Temporal variability” the material exhibits a regular temporal pattern dependent on the time of day, day of week or time of year. For example, municipal waste composition may include more packaging materials after Christmas and Easter.

“Spatial variability” Spatial variability is where one part of a waste differs from another. Most materials are heterogeneous in this way when considered in bulk. The spatial variability might arise from:

- ☐ the waste arising in physically different locations, e.g. three different containers
- ☐ temporal variation in the producing process, for example three different batches of filter cake in a single skip may differ due to the feedstock used.
- ☐ a separation within in the waste, for example solids settling out in a container of liquid.

“Scale of sampling” The ‘scale’ is the amount of waste which a sample directly represents. For example, a sample taken from a drum may directly represent the material in that drum.



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“Probabilistic sampling” has an equal chance of sampling any individual part of a waste and implies that the entire population is accessible for sampling. The approach enables the reliability of the resulting conclusions to be quantified statistically. For that reason, the sampling plan for waste classification and hazardous waste assessment should be based wherever possible on probabilistic sampling.

“Judgemental sampling” is where part of the waste is excluded from sampling (non-probabilistic) or has a reduced chance of being sampled (partially probabilistic). Examples of where judgemental sampling might need to be considered are:

- ☐ to target a specific item or component of the waste, or
- ☐ where probabilistic sampling of the entire population is practically impossible given time, resources or money.

“A sample” is a quantity of waste obtained from a single sampling action that is analysed as a single unit.

“A composite sample” is a collection of increments, each obtained from a single sampling action, that are combined to form a single unit for analysis

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