



Operating Techniques

Morgan Sindall Woodchip Storage Facility

Countrystyle Recycling Limited

Prepared by:

SLR Consulting Limited

Treenwood House, Rowden Lane, Bradford on Avon,
BA15 2AU

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Basis of Report

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1.0 Introduction

Countrystyle Recycling Limited (CRL) has retained SLR Consulting Limited (SLR) to prepare an Environmental Permit (EP) application for Morgan Sindall Woodchip Storage Facility, under the Environmental Permitting (England and Wales) Regulations (as amended) 2016.

The EP application seeks to allow CRL to store woodchip at Morgan Sindall Woodchip Storage Facility, Ridham Dock, Sittingbourne, Kent, ME9 8SR (the Site)

This Operating Techniques (OT) document sets out best practice for operating the Site, based on legislation and best available techniques in the industry.

The OT will be reviewed and updated on an annual basis or because of any of the following activities (list not exhaustive):

- The issue of an EP variation by the Environment Agency (EA);
- A material change to the operational process;
- A substantiated complaint; or
- Any changes in legislation or guidance documents applicable to Ridham Docks.

This OT document is supplemented by the following documents submitted within this application:

- Non-Technical Summary;
- Environmental Risk Assessment;
- Site Condition Report;
- Fire Prevention Plan; and
- Associated Drawings including: Site Layout, Environmental Site Setting and Fire Prevention Plan.

1.1 Report Structure

This report describes the operating techniques that will be implemented at the facility to ensure compliance with the conditions of the EP. The report is divided into the following sections.

- **Section 1** Introduction
- **Section 2** Management
- **Section 3** Accident Management
- **Section 4** Operations
- **Section 5** Emissions and Monitoring
- **Section 6** Information

1.2 Site Setting

The Site is located at Ridham Docks, Sittingbourne, Kent, centred on National Grid Reference (NGR) TQ 91863 68335. The village of Iwade is located approximately 1.5km southwest of the Site.

The area surrounding the Site comprises predominantly agricultural / open land to the west, with areas of industrial and commercial use to the south, north and east.



The Swale, a tidal channel of the Thames estuary, is situated 210m to the north of the Site boundary. The Swale is designated as a Ramsar site, Site of Special Scientific Interest (SSSI) and Special Protection Area (SPA) and forms part of Elmley National Nature Reserve. The Site borders the SSSI, SPA and RAMSAR site on its western and southern boundary. These are associated with the Swale.

The Site is accessed on its eastern boundary via Lockyer Road.

The Site is not located within a groundwater Source Protection Zone (SPZ).

The proposed EP Boundary is illustrated in Drawing 01; the Site layout is illustrated on Drawing 02. Local receptors within a 500m radius of the Site are shown on Drawing 03, and Cultural and Natural Heritage Receptors on Drawing 04.

Table 1-1 below summarises the surrounding land uses.

Table 1-1 Surrounding Land Uses

Boundary	Description
North	To the north lies industrial/ commercial premises and The Swale designated as an SSSI, Ramsar site and SPA. The land beyond this predominantly comprises Elmley NNR.
East	To the east lies industrial/ commercial premises and The Swale designated as an SSSI, Ramsar site and SPA. The land beyond this predominantly comprises Elmley NNR.
South	Land to the south of the Site predominantly consists of industrial/ commercial premises including the currently inactive remaining Morgan Sindall site. Beyond this is the village of Kemsley located approximately 2km south of the Site.
West	The A249 lies approximately 680m to the west. Land around this largely comprises open / agricultural land, in addition to the village of Iwade which is located approximately 1.5km southwest of the Site. The dwellings in Iwade are the closest residential receptors to the Site. Swale railway station is located 900m northwest of the Site.



2.0 Management

2.1 Management System

Operational procedures for the management of the facility will ensure that all appropriate pollution prevention and control techniques are delivered reliably and on an integrated basis.

This Operating Techniques/ Environmental Management System (EMS) documents assist in maintaining compliance with regulatory requirements and managing environmental impacts.

2.1.1 Management Structure and Responsibilities

The Site Manager will be responsible for day-to-day operations and compliance with the EP.

Whenever the Site is open to receive waste it will be supervised by members of staff who are suitably trained and fully conversant with the requirements of the EP regarding:

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

2.2 Technical Competence and Training

The waste management activities undertaken at the facility will be under the overall control of a technically competent person who holds either a relevant Certificate of Technical Competence (COTC) under the Waste Management Industry Training and Advisory Board (WAMITAB) scheme.

All staff employed at the facility will benefit from a training programme, which ensures their professional and technical development.

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

The training programme will ensure that relevant staff are aware of the following:

- Regulatory implications of the EP for the facility and their specific work activity;
- All potential environmental effects from operations under normal and abnormal circumstances;
- The need to report deviations from the EP;
- Prevention of accidental emissions and action to be taken should accidental emissions occur; and
- Records of training needs and training received are maintained.

2.3 Site Security

The Site will be accessed from the eastern boundary via Lockyer Road.

In order to prevent unauthorised access, the Site will have a number of security measures in place to limit the likelihood of a security breach or vandalism including:



- Perimeter security fencing located along all boundaries;
- Automated gated entry with access granted via a fob system.
- Lockable doors on the office/welfare facilities;
- Full CCTV coverage of all external areas;
- Inspection and maintenance procedures; and
- A visitor sign in system.

Only authorised personnel will have access to the Site.

2.4 Display of Environmental Permit

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

2.5 Managing Documentation and Records

Controls will be in place to ensure that all documents are issued, revised and maintained in a consistent fashion.

2.6 Reporting Non-Compliance and Taking Corrective Action

Non-compliances detected on site will be reported, investigated and rectified. Staff will maintain awareness of non-compliances in the following areas:

- Actual or potential non-compliance;
- System failure discovered at internal audit;
- Suppliers or subcontractors breaking the agreed operating rules;
- Incidents, accidents and emergencies;
- Other operational system failure; and
- Complaints.

The action taken in response to the non-conformance may include:

- Obtaining additional information on the nature and extend of the non-conformance;
- Discussing and testing alternative solutions;
- Modifying procedures and responsibilities;
- Seeking approval for additional resources and training; and
- Contacting suppliers and contractors.

2.7 Auditing and Legal Compliance

There will be a procedure to ensure the facility is audited at defined intervals and that the progress of corrective and preventative action is monitored.

2.8 Monitoring, Measuring and Reviewing Environmental Performance

Environmental performance will be regularly reviewed, and any necessary actions will be taken.



2.9 Operational Control, Preventative Maintenance and Calibration

This document will complement operational procedures to ensure effective control of operations, the use of approved suppliers and contract services, the maintenance of operational equipment and the calibration of monitoring equipment.

All plant and equipment will be subject to a programme of planned preventative maintenance which will follow the inspection and maintenance schedule recommended by the manufacturer.

2.10 Design and Construction Quality Assurance

All relevant elements of the facility will be designed in accordance with recognised standards, methodologies and practices.

The design process will use a risk-based approach and will be appropriately documented using drawings, specifications and method statements to provide an adequate audit trail.

Construction Quality Assurance (CQA) plans will govern the construction of any key environmental control infrastructure relating largely to changes to the drainage infrastructure or impermeable pavements. These CQA plans will be prepared by competent and suitably qualified persons and will detail the assurance and validation process.

A competent and suitably qualified person will supervise the construction activities and prepare a validation report confirming that the key construction activities have been carried out in accordance with the CQA plan.



3.0 Accident Management Plan

CRL recognise the importance of the prevention of accidents that may have environmental consequences and that it is crucial to limit those consequences.

An accident management plan will be implemented and maintained at the facility to ensure that the Site and staff are fully prepared for any such incidents. The accident management plan will be reviewed at least every four years or as soon as practicable after an incident, with changes made accordingly to minimise the risk of occurrence.

The following accident management plan describes the techniques that will be implemented to minimise the risks posed to the environment. Activities affecting the health and safety (H&S) of operatives, contractors and visitors will be separately managed in compliance with H&S regulation and company H&S Policy.

3.1 Hazard Identification

The following potential hazards have been identified:

- Unauthorised waste;
- Fire;
- Dust from waste storage, handling and vehicle movements;
- Loss of containment - spillage and leakage; and
- Security and vandalism.

The following sections summarise the measures necessary to minimise the potential causes and consequences of accidents.

3.1.1 Unauthorised Waste

Acceptance of unauthorised materials could result in unacceptable wastes being stored at the Site.

Upon delivery, waste will be subject to strict waste acceptance procedures to identify, reject and/or segregate potentially non-conforming waste.

Only waste authorised by the EP is accepted at the Site. The reduced waste list massively restricts the potential for unauthorised waste acceptance. It is considered the majority of waste will be transferred from the neighbouring Countrystyle woodchip site to the north.

All wastes are subject to inspection and checking against the declaration on the waste transfer note / consignment note.

In the event that unauthorised waste is delivered to the Site, the waste will be segregated and stored in a designated quarantine area prior to export from the Site.

Waste export for woodchip is predominately international and therefore covered by a further degree of transfrontier shipment.

No waste will be brought to the Site unexpectedly.

3.1.2 Fire

The Site will operate under an agreed Fire Prevention Plan (FPP) prepared as part of the EP application. A copy of the FPP will be available onsite.

The plan follows EA guidance for FPPs and details the required mitigation and management methods to prevent a fire of combustible materials stored on Site. The information contained within the FPP aims to meet the 3 main objectives of the EA's FPP Guidance:



- Minimise the likelihood of a fire happening;
- Aim for a fire to be extinguished within 4 hours; and
- Minimise the spread of fire within the Site and to neighbouring sites.

3.1.3 Dust emissions

Woodchip waste is considered likely to be a source of dust emissions if mitigation measures were not in place.

The Site will operate under an agreed Dust Management Plan (DMP) prepared as part of the EP application. A copy of the DMP will be available onsite.

The DMP focuses on the measures to be implemented for managing emissions from woodchip storage on the Site given this being the waste type considered to have the greatest potential for dust emissions. The plan follows EA guidance for DMPs and details the required mitigation and management methods to minimise dust emissions from Site operations.

The mitigation measures to be implemented at the Site in relation to dust will include, but are not limited to, the following:

- Vehicles will be covered on entering or exiting the Site, however, a pragmatic approach will be taken if woodchip is moving short distances between the Countrystyle site to the north as practically sheeting a vehicle may not be justified or warranted given the short distance and slow speeds involved.
- Storage areas of woodchip on the Site comprise an impermeable surface with sealed drainage, thus minimising suspension of dust from stockpiling and handling operations.
- Good housekeeping such as sweeping the Site and keeping machinery in good working order.
- Dampening of surfacing and stockpiles where necessary.
- Daily visual inspections will be conducted and in response to any complaints. If dust is deemed a nuisance from any of these inspections, supplementary mitigation measures will be enforced to reduce any dust emissions.
- The result of any inspections or investigations as a result of complaints will be recorded in the site diary.

The Site Manager will be responsible for implementing risk management measures in accordance with operational and management procedures.

3.1.4 Loss of Containment

Loss of containment could lead to spillage and leakage of potentially contaminating liquids. No fuel, oil, chemical or other potentially polluting liquid storage is routinely stored onsite.

However, the following measures will be in place to prevent loss of containment and minimise the risk and impact of releases should such storage occur;

- Storage vessels: storage tanks will be constructed to the appropriate British Standard;
- Inspection: tanks will be inspected visually on a regular basis by the Site staff to ensure the continued
- Integrity of the tanks, and identify the requirement for any remedial action;



- Spill kits: materials suitable for absorbing and containing minor spillages will be maintained onsite; and
- Monitoring techniques: the Site staff will undertake regular monitoring for evidence of spillage and leakage.

In the event of any potentially polluting leak or spillage occurring on the Site, the following action will be taken:

- Minor spillages will be cleaned up immediately, using sand or proprietary absorbent. The resultant materials will be placed into containers and will then be removed from the Site and disposed of at a suitably permitted facility. The incident will be logged in the Site diary.
- Any dry wastes spilled onsite will be collected and transported to the appropriate area of the Site.
- In the event of a major spillage, which is causing or is likely to cause polluting emissions to the environment, immediate action will be taken to contain the spillage and prevent liquid from entering surface water or drains. The spillage will be cleared immediately and placed in containers for offsite disposal, and the EA will be informed.

3.1.5 Security and Vandalism

The Site will be accessed from its eastern boundary via Lockyer Road.

In order to prevent unauthorised access, the Site will have a number of security measures in place to limit the likelihood of a security breach or vandalism including:

- Perimeter security fencing located along all boundaries;
- Automated gated entry with access granted via a fob system.
- Lockable doors on the office/welfare facilities;
- Full CCTV coverage of all external areas;
- Inspection and maintenance procedures; and
- A visitor sign in system.

Only authorised personnel will have access to the Site.

3.2 Contingency Plans and Procedures

The Site will implement a contingency plan to ensure that the following are achieved:

- Compliance with all EP conditions and operating procedures during maintenance or shutdown at the Site, including disruption at other facilities that would affect supplies to the Site or the removal of waste from it;
- No exceedance of limits in the EP and that appropriate measures for storing and handling waste are continued to be applied; and
- Cessation of waste acceptance unless there is a clearly defined method of recovery and enough permitted capacity onsite.

The contingency plan will include the following:

- Procedures that ensure, as far as possible, that any planned shutdowns at waste sites where waste is sent are known about in advance;



- Procedures to manage the volumes of waste onsite during planned or unplanned shutdowns of plant which will include:
 - Identification of any known or predictable malfunctions with plant on site and the procedures, spare parts, tools and expertise required to deal with them;
 - A record of spare parts held or a list of where they can be obtained from and how long it would take;
 - A procedure to identify, review and prioritise items of plant which need a preventative regime;
 - A record of all equipment and plant whose failure could directly or indirectly affect the environment or human health.
- A consideration of whether sites or companies relied upon as part of the contingency plan can take waste at short notice and are authorised to do so in addition to carrying out their existing activities;
- If EP limits could be exceeded, a consideration of whether alternative disposal or recovery options are possible on the basis of extra cost and geographical distance will be undertaken;
- Procedures for auditing performance against the contingency measures and for reporting the audit results to the Site Manager.

3.3 Facility Decommissioning

The Site will require a simple decommissioning consisting of the removal of all mobile plant and drainage system infrastructure. The only subsurface tanks and pipework are associated with the drainage system. The decommissioning plan will demonstrate that:

- The Site can be decommissioned without causing pollution; and
- The Site will be returned to a satisfactory state.

3.3.1 Site Surrender

In relation to the surrender of the EP, a Site Condition Report (SCR), (reference 402.065590.00001_SCR) has been prepared in support of the EP application, setting out the baseline conditions of the Site for comparison at the point of surrender.

The SCR will be updated during the operational life of the Site as appropriate. To assist with EP surrender, records will be maintained to demonstrate how the land has been protected at all times between the date of EP issue and surrender.



4.0 Operations

4.1 Process Description

The EP will allow for the storage of woodchip. There will be no treatment of waste at the Site.

CRL operate the neighbouring “Ridham Dock Wood Facility” under EP reference EPR/HB3337AG located immediately to the north of the Site. This site operates as a wood treatment facility to accept, chip and store wood and wood chip for both recovery via biomass CHP and manufacture of panel board, with a maximum annual throughput of 100,000 tonnes.

The new EP being sought by CRL seeks to support the operations under the neighbouring EPR/HB3337AG permit by storing the woodchip generated from the wood processing activities. The woodchip will be stored on the Site in windrows style stockpiles pending export via boat and road.

4.2 Waste Tonnages

The Site will accept up to 30,000 tonnes per annum of wood waste. The maximum amount of waste stored onsite at any one time will be 3,500 tonnes for wood waste.

4.3 Permitted Activities

The Site will be regulated as a bespoke waste operation as per the Environmental Permitting (England and Wales) Regulations 2016 (as amended).

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

- R13: Storage pending recovery or disposal.

4.4 Waste Types and Storage

4.4.1 Wood Operations

The List of Waste (LoW) codes set out in Table 4-1 below are proposed to be accepted under the EP for the wood operations

Table 4-1 Proposed LoW codes for wood operations

LoW Code	Description
02	WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING
02 01	wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 03	plant-tissue waste (wood and bark only)
02 01 07	wastes from forestry (wood and bark only)
03	WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE, PULP, PAPER AND CARDBOARD
03 01	wastes from wood processing and the production of panels and furniture
03 01 01	waste bark and cork



LoW Code	Description
03 01 05	sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04
03 03	wastes from pulp, paper and cardboard production and processing
03 03 01	waste bark and wood
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 03	wooden packaging
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 02	wood, glass and plastic
17 02 01	Waste wood from construction and demolition
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER 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 07	wood other than that mentioned in 19 12 06
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 38	wood other than that mentioned in 20 01 37
20 02	garden and park wastes (including cemetery waste)
20 02 01	biodegradable waste (wood and bark only)

No more than 3,500 tonnes of wood waste shall be stored on the Site at any one time. Storage timeframes for waste will be a maximum of 6 months.

The Site is not located in a groundwater SPZ. All wood waste is stored on impermeable surfacing with sealed drainage. The surface will be kept fit for purpose such that it can be swept / scrapped to prevent a build-up of debris and free of signs of cracking and disrepair. The Site will be kerbed at the boundary preventing any release of run-off from the site.

All process water is captured in one of two 600m³ on-site tanks, and the collected water is removed by tanker off-site.

It is proposed that the annual throughput of the Site for wood waste will be 30,000 tonnes per annum (tpa).

The Site will operate strictly to 'First in First out' (FIFO) principles.

There will be no treatment of wood waste on the Site under the EP.



4.5 Waste Pre-Acceptance, Acceptance and Rejection

4.5.1 Hours of Operation

The Site operates on a 24/7 basis, therefore there could be operations working anytime 7 days a week, including public holidays.

4.5.2 Waste Pre-Acceptance

Strict waste acceptance procedures (WAP) will be followed at the Site to ensure that the Site only accepts waste that is:

- Suitable for the activity;
- Allowed by the EP; and
- Appropriately considered by the ERA.

The WAP will also assist with:

- Ensuring the activities do not cause pollution;
- The waste sourcing decision making process; and
- Preventing the receipt of non-permitted wastes.

Waste is only accepted onsite if the Site has the capacity for it.

The following information will be gathered and recorded for prospective incoming waste deliveries:

- details of the waste producer including organisation name, address and contact details
- where the waste is coming from
- full description of the waste including the quantity
- the List of Waste code (European Waste Classification, EWC, code)
- any hazardous properties or presence of any regulated chemicals, for example, POPs

It is noted that the woodchip waste to be accepted under the EP will be sourced from CRL's neighbouring facility.

Pre-acceptance records must kept in any event when the waste is confirmed to be acceptable to the Site.

4.5.3 Waste Acceptance

The Site will implement waste acceptance procedures to check that the waste meets the criteria stipulated during waste pre-acceptance. This will ensure the waste is as expected and that it can be accepted at the Site.

All vehicles bringing waste material to the Site will report to the Site Office. All wastes will undergo a visual inspection during deposition to confirm its description and composition against the pre-acceptance criteria.

Waste will only be stored at the Site if the description in the accompanying documentation is in accordance with the EP and that onsite inspection confirms the waste is consistent with the pre-acceptance criteria. In addition, all relevant storage areas (quarantine, reception and general) at the Site must have the physical capacity needed for the waste to be received. Wastes will not be accepted if this capacity is not available.



4.5.4 Load Inspection and Waste Control

All operational staff shall be trained to identify whether the load shall be accepted or rejected.

Waste is only accepted at the Site if the description in the accompanying documentation is in accordance with the EP and that onsite inspection confirms waste is consistent with the pre-acceptance criteria.

Records of non-compliant waste received at the Site will include details on:

- The quantity;
- Characteristics;
- Origin;
- Delivery date and time; and
- The identity of the producer and carrier.

Waste is not accepted unless the Site is adequately resourced to receive the waste.

A record will be kept in the Site Diary of all rejected wastes. Where required, the EA will be notified of the non-conformance.

4.5.5 Waste Quarantine Procedures

Should non-conforming waste be identified, waste would be removed and placed in a designated quarantine area located on the Site prior to removal to a suitably permitted facility. The waste quarantine areas will be clearly marked.

Quarantine storage is limited to a maximum of fourteen working days.

A record is kept in the Site Diary of all rejected wastes and all wastes kept in isolation storage.

4.5.6 Means of Measurement and Waste Tracking

The Site's waste tracking system will hold all the information generated during:

- Pre-acceptance;
- Acceptance;
- Storage; and
- Removal off-site.

Waste will be cleared from the Site in the date order in which they were accepted/stockpiled (i.e. First-In, First-Out principle).

4.6 Site Infrastructure and Equipment

4.6.1 Site Identification Board

A Site identification board which is easily readable from outside the Site entrance during hours of daylight is provided at the main site entrance.

In the event of damage or defect that significantly affects the legibility of the board it would be repaired or replaced.

The board will display the following information:

- Site name and address;



- EP holder;
- EP reference;
- Emergency contact name and telephone number;
- EA national telephone numbers; and
- Days and hours that the Site is open to receive waste.



5.0 Emissions and Monitoring

The Site will be constructed and operated so that there are no point source emissions to air, surface water, groundwater or land.

5.1 Surface Water and Groundwater

5.1.1 Engineered Containment

Loss of containment can lead to spillage and leakage of potentially contaminating liquids. To prevent loss of containment and minimise the risk and impact of releases, the following measures are implemented:

- Containment system – tanks containing potentially polluting liquids are constructed so that any leaks / spills are contained. All tanks are bunded so that the bund is capable of containing at least 110% of the volume of the tank.
- Storage vessels – storage tanks are constructed to the appropriate British Standard.
- Spill kits are also available on site.

There is no proposed fuel or oil storage on the Site, other than those present within mobile plant.

5.1.2 Site Drainage

5.1.2.1 Site Surfacing

The Site will be operated to prevent fugitive emissions to surface water and groundwater.

The Site has impermeable surfacing, preventing any surface water from running off. All water is captured in one of two on-site tanks, and the collected water is removed by tanker off-site. Site surfacing will be maintained as required to ensure surfacing is fit for purpose. The surface will be maintained such that the working surface will:

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

All operational areas and quarantine areas will be inspected to ensure the integrity and fitness for purpose of their construction is maintained at all times.

5.1.2.2 Surface Water Drainage

Wood Storage

The woodchip will be stored on impermeable surfacing preventing any surface water from running off. There are strict controls over the handling and storage of the woodchip to ensure its suitability for exportation. With strict waste acceptance procedures and controls of waste on the Site, it is considered that the potential for contaminated runoff from the woodchip waste storage area is low.

5.2 Odour

If any odorous material is deposited onsite, it will be regarded as an emergency, the material will be isolated where possible and removed as soon as possible.



Only waste authorised by the EP is accepted at the Site. Proposed waste types are not considered to be odorous in nature.

All wastes are subject to inspection and checking against the declaration on the waste transfer note / consignment note. In the event that unauthorised waste is delivered to the Site, the waste will be segregated and stored in a designated quarantine area prior to removal from the Site.

No waste is brought to the Site unexpectedly.

Only competent staff will handle waste using appropriate equipment.

Odorous emissions will be reported to the management with immediate effect and measures will be implemented to deal with the fugitive emission at source.

Any odour identified onsite is recorded in the Site Diary, investigated by the Site Manager and remediated as soon as possible.

5.3 Dust

As mentioned in Section 3.1.3, the Site will operate in accordance with the Dust Management Plan (DMP) prepared as part of the EP application. The DMP lists the preventative and remedial mitigation measures to be implemented at the Site in regard to dust emissions from waste operations. Wood waste stored on the Site is considered to be a potential source of dust emissions.

5.3.1 Vehicle Movements

Site surfacing comprises hardstanding and impermeable pad therein minimising accumulation of dust/dirt on vehicles visiting the Site and reducing the potential risk of trackout of dust and dirt from the Site onto the public road network.

Daily visual inspections will be conducted in response to any complaints. If dust is deemed a nuisance from any of these inspections, mitigation measures will be enforced to reduce any dust emissions.

The result of any inspections or investigations as a result of complaints will be recorded in the Site Diary.

5.3.2 Waste Storage and Transfer

Storage areas for wood waste comprise a hardstanding surface, thus minimising suspension of dust from stockpiling and handling operations.

Daily visual inspections will be conducted and in response to any complaints. If dust is deemed a nuisance from any of these inspections, mitigation measures will be enforced to reduce any dust emissions.

The result of any inspections or investigations as a result of complaints will be recorded in the Site Diary.

5.4 Noise

There are no residential properties or other sensitive receptors, such as hospitals and schools, within 1.5km of the Site.

To ensure that noise and vibrations are limited, the following management techniques will be implemented:

- All plant and machinery will be operated and maintained in accordance with manufacturer's specifications;



- Machinery will be operated so as to minimise noise;
- Vehicles adhere to a speed limit onsite; and
- Site surfaces will be kept in good repair to minimise noise associated with uneven roads

Daily auditory monitoring will be carried out by site personnel to identify any unacceptable levels of noise. A record of the inspection findings will be made in the Site Diary. Remedial action will be taken in the event that noise from the Site is detected at nearby sensitive receptor locations.

5.5 Pests

Site personnel will conduct daily inspections of waste storage areas for signs of scavenging animals.

If scavenging animals are spotted a licenced contractor is contacted to remove them and the offending waste type will be investigated and removed if necessary.

5.6 Litter

The Site will be inspected daily for signs of litter. The Site benefits from good housekeeping. In the event that any litter is identified onsite, it is cleared from the affected area.

5.7 Mud and Debris

The Site access road and Site surfacing is designed, constructed, and maintained to ensure they are adequate for traffic usage. The roads will be kept clean and in good state of repair and therefore present low risk in terms of transferring mud.

All vehicles will be checked to ensure that they are clear of loose waste prior to leaving the Site.

The Site will be inspected daily for signs of litter, mud or waste. Any identified instances of mud, litter or waste are cleared immediately.



6.0 Information

All relevant notifications and submissions to the EA regarding the Site will be made in writing and shall quote the EP reference number and the name of the EP holder.

Records are maintained for at least 3 years, however in the case of off-site environmental effects, and matters which affect the condition of land and groundwater the records are kept until EP surrender.

6.1 Reporting and Notifications

6.1.1 Changes in Technically Competent Persons

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

6.1.2 Waste Types and Quantities

A summary report of waste types and quantities accepted and removed from the Site for each quarter, will be submitted to the EA within 1 month of the end of the quarter.

6.1.3 Relevant Convictions

The EA will be notified of the following events:

- The operator being convicted of any relevant offence; and
- Any appeal against a conviction for a relevant offence and the results of such an appeal.

6.1.4 Notification of Change of Operator's or Holder's Details

The EA will be notified of the following:

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

6.1.5 Adverse Effects

The EA will be notified without delay following the detection of the following:

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





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