

Stewartby Waste Transfer Station

Environmental Management System Summary

FCC Waste Services (UK) Ltd

Report No. 14-K0157-ENV-R-00001 App D

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Disclaimer: Please note that this report is based on specific information, instructions and information from our Client and should not be relied upon by third parties.

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1 Introduction

1.1 Report Objectives

This Environmental Management System (EMS) Summary has been prepared by ByrneLooby Partners (UK) Limited to support a permit application by FCC Waste Services (UK) Ltd (the proposed Operator) for a Waste Transfer Station (WTS) at Stewartby, Bedford (the Site).

The Operator has an Environmental Management System (EMS) certified to ISO14001. The Operator also has a Competence Management System (CMS) certified by LRQA. Both certificates are attached to the Permit Application Report (referenced: 14-K0157-ENV-R-00001). The Management Systems covers the following items:

- Site operations;
- Site and equipment maintenance plans;
- Contingency plans;
- Accident prevention and management plan;
- Monitoring, measurement evaluation and compliance;
- Complaints procedure;
- Managing staff competence and training records;
- Control of records;
- Internal Auditing Process; and
- Management System Review and Update.

An Environmental Risk Assessment (ERA) (14-K0157-ENV-R-00003), Dust Management Plan (DMP) (14-K0157-ENV-R-00004), Site Condition Report (SCR) (14-K0157-ENV-R-00002) and Technical Standards (14-K0157-ENV-R-00005) have been submitted with this application. Reference has been made to these documents and the following Environment Agency (Agency) guidance:

- [Develop a management system: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/develop-a-management-system-environmental-permits)

This document provides a summary of the EMS for the purposes of Stewartby WTS.

1.2 Site Infrastructure

The permit boundary for the Site is shown on drawing referenced K0157/1/001. The Site Layout is shown on drawing referenced: K0157/1/002.

The Site will operate as a WTS for the import of non-hazardous excavation, construction and demolition waste with an inherently low biodegradable and contamination potential. The waste will be imported via train and transferred to HGVs for onward off-site transfer for recovery or disposal elsewhere. The Site benefits from three existing sidings, an offload area and internal site access roads. In order to optimise the operations of the Site, the Operator proposes to install a replacement weighbridge and weighbridge office at the entrance to the Site and a wheel wash to the north of the Sidings.

A Noise Assessment undertaken in support of the planning application identified the need for an acoustic barrier along the southern boundary of the Site to mitigate the effects of noise on future residential properties within the derelict brickworks. Fencing and lockable gates also surround the Site.

1.3 Site Operations

Waste acceptance and storage procedures are details in the Technical Standards (14-K0157-ENV-R-00005) and will not be repeated in this report. Site Operations are also detailed in the Technical Standards but have been summarised below for reference purposes.

Trains containing the waste for onward transfer will pull into the sidings for Lines 1 and 2. Line 3 will not be used for offloading and would only be used to hold the trains and HGVs temporarily in the event that Lines 1 and 2 are occupied.

The material will be removed from the train carriages using a mobile grab, the operator of which will be positioned to give a clear view of the inside of the carriage in the awaiting HGV. Under normal operating conditions the waste will be transferred directly into the HGVs. The grab and awaiting HGVs will progress gradually along the length of the stationary train until it had been emptied.

Stockpiling of material would not typically be required, however an area of impermeable surfacing with sealed drainage has been designated to allow for temporary stockpiling of material in the unlikely event there are no HGVs available to directly receive the waste. This material will be excavated from the storage area as soon as practicably possible. Any spillages of dry soil or waste material during the transfer process between train and HGV will be removed as soon as practicably possible.

HGVs will access the Site off Green Lane to the south of the Site. They will weigh in at the site weighbridge before using the internal site access road to access the Sidings. HGVs will then be loaded as described above. Once full, the HGVs will be sheeted and travel around the Sidings, passing through a wheel wash and weighing off on the weighbridge before exiting onto Green Lane.

No treatment activities are proposed within the permitted boundary.

1.4 Site and Equipment Maintenance Plan

1.4.1 Plant

Plant on site will typically constitute, but not be limited to:

- Mobile Grab;
- Dump-truck;
- 360 Excavator; and
- Loading shovel

All plant will be serviced and maintained at the site in accordance with the manufactures, recommended maintenance schedules. Additional plant will be brought to the site as and when required.

Mobile and static plant will be serviced and maintained in accordance with manufacturers' recommended maintenance schedules.

In the event of such plant experiencing significant (more than two working days) downtime, replacement hire plant will be mobilised for the remaining duration of the downtime. Should the plant experience significant downtime any material awaiting processing will be diverted to another suitably permitted processing plant or to landfill as necessary.

1.4.2 Site Surface and Drainage Systems

All areas of hardstanding, impermeable pavement, sealed drainage, covered buildings, roofed areas and containers:

- will be inspected no less frequently than monthly, to ensure continuing integrity and fitness for purpose of their construction, and the inspection and any necessary maintenance noted as being required will be recorded in accordance with the Site's EMS; and
- in the event of any damage occurring which breaches the integrity of the engineered containment so that it no longer meets the required standards, will be closed such that waste will not be imported within the affected area until the necessary remedial work has been completed.

Substantial defects (i.e. Such that the containment provision afforded by the structures may be compromised) will be dealt with immediately, where practicable. The relevant area will be cordoned off and remedial works undertaken within twenty-four hours with permanent repairs to be affected within seven days unless otherwise agreed with the Environment Agency.

Drainage will be checked on a six-monthly basis or if there has been a notable incident on site which has led to increased surface water accumulating. Identified defects will be noted in

accordance with the Sites EMS and rectified as soon as practically possible and, in any event, within seven working days unless otherwise agreed with the Environment Agency.

1.5 Contingency Plans

Should unscheduled maintenance be required, for example breakdowns, enforced shutdowns or emergency situations Site will implement measures to clear stored wastes and divert incoming wastes as required and the Site Manager will notify the Environment Agency.

Table 1 – Contingency Plan

Issue	Period	Contingency Plan
<u>Actions for waste deliveries</u> Facility not available as the deliver location e.g. complete power failure / structural failure, storage capacity full	1 day	Direct delivery to alternative facility
	Up to 72 hours	Direct delivery to alternative facility
	1 week	Direct delivery to alternative facility
	1 month	Direct delivery to alternative facility
	3 month or longer	Identify alternative long term delivery point – potentially temporary transfer station
<u>Actions for waste already onsite</u> Facility not available as the delivery location e.g. complete power failure / structural failure, storage capacity full	1 day	Monitor situation
	Up to 72 hours	Remove stored waste to alternative facility
	1 week	Direct delivery to an alternative facility
	1 month	Direct delivery to an alternative facility
	3 month or longer	Identify alternative long term delivery point – potentially temporary transfer station

1.6 Accident Prevention and Management Plan

There is potential for accidents to occur during the operation of Stewartby WTS which may have a detrimental environmental impact. This can include spillages of fuels or other polluting liquids due to mechanical breakdown; fires causing damage to containment measures or generating contaminated liquid; or, deliberate vandalism resulting in pollution similar to the aforementioned. The Accident Risk Assessment and Management Plan is included in Table 5 of the ERA (14-K0157-ENV-R-00003).

1.7 A Changing Climate

The Site is required to complete a Climate Change Risk Assessment as the screening score in the Part B2 Application Form exceeded 5. The risk assessment is attached as Appendix B Permit Application Report (referenced: 14-K0157-ENV-R-00001).

1.8 Complaints Procedure

Any complaints received at the Site or via the Regulatory Bodies including the Agency and Local Authority, will be recorded. This will instigate further investigation at the location of the complaint and on-Site to determine the extent and location of the issue. Where possible, as much information and detail about the complaint will be recorded, whether this is from the relevant authority or a complaint direct to the Site. This information will assist in the investigation and determining the source of the issue e.g. differentiating between potential onsite or other off-Site activities.

All complaints and queries will be logged in accordance with the Site's EMS as soon as is practicably possible. All complaints logged will be subject to investigation, and complainants responded to within 48 hours of receipt, where possible. All responses will be through trained and experienced staff.

Complaints regarding the Site will be investigated in accordance with the protocol, and appropriate records maintained which may include:

- Complaints received including name and contact details of complainant (if known), and complainants description;
- Nature of problem including date, time, duration, prevailing weather conditions and cause of the problem;
- On-Site activities and operational conditions at the time of the complaint;
- Records of the likely sources to cause the complaint, even if it is clearly not from the Site;
- Details on the corrective action taken and any subsequent changes to monitoring and operational procedures; and,
- The Environment Agency will be proactively informed by the Operator of the complaint and the Operator will confirm to the best of its knowledge the information described above.

The Operator will ensure that the complainant has all the relevant contact details of the Site (i.e. the Site Manager) and the officer responsible at the Environment Agency. The operator will be in regular contact with the complainant and the Environment Agency whilst the cause of the problem is being investigated and remediated.

An evaluation of the effectiveness of the techniques used will be carried out on completion of any remedial measures, or if the complaints persist. Records of the above will be retained by Site for future reference.

1.9 Contact Information for the Public

The Site will be readily contactable to outside organisations and to members of the public. The Site signage board (placed in a readily visible location) will contain the necessary contact details for both the Site operations and Environment Agency. The company website also contains the necessary contact details.

Any complaints received directly to Site will be notified to the Environment Agency. Should an off-site issue arise, therefore, the complainant has a readily available means of getting in touch with the Operator.

1.10 Managing Staff Competence and Training Records

Whenever the site is open to receive wastes it will be supervised by at least one member of staff who will be fully conversant with the requirements of the Permit and Environmental Management System regarding:

- Waste acceptance and control procedures
- Operational controls and environmental monitoring
- Maintenance
- Record-keeping
- Emergency action plans
- Notifications to the Environment Agency.

A technically competent person as defined by current Environment Agency guidance will have responsibility for the day to day operation of the Site.

The Operator has a CMS certified by LRQA. The CMS is under constant review and updated as soon as any changes are made. It focusses on the people who are certified (Technically Competent) to Manage or Supervise certain facility types (new or existing) within the CMS Scope as set by the Operator. The CMS provides 'Corporate Competence' with the technical competence of their employees.

1.11 Keeping Records

Onsite records will be kept at the Site in the weighbridge office and will be available for inspection by officers of the Environment Agency during normal operational hours. Records are also stored electronically and can be gained at request. Records kept typically include, but not be limited to:

- Permits issued to the site;
- Other legal requirements;

- Risk assessments;
- All management system plans;
- Any plans required by the application or permit depending on your type of activity (for example dust management plan);
- All operating procedures;
- Staff competence and training (for example CMS certificates);
- Emissions and any other monitoring undertaken (for dust monitoring);
- Compliance checks, findings of investigation and actions taken;
- Complaints made, findings of investigation and actions taken;
- Audits of Management System, findings (reports) and actions taken;
- Management reviews and changes made to the Management Systems; and,
- Where applicable, certification audit reports and any actions carried out.

Waste acceptance records will also be kept in accordance with the Technical Standards (14-K0157-ENV-R-00005).

A SCR (14-K0157-ENV-R-00002) has been submitted with this application and will be kept up to date through the life of the permit.

1.12 Review your Management Systems

The Management Systems are reviewed and updated on a regular basis, the EMS as a minimum annually and the CMS as a minimum 6-monthly.



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