



OLIVE
Compliance

OPERATING TECHNIQUES

R.B. Groundworks and Fencing Ltd

**Unit 6
Ennerdale Road
Blyth
Northumberland
NE24 4RT**

EPR/KB3209KR

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1.0 Introduction

RB Groundworks and Fencing Ltd (RBG) have instructed Olive Compliance Limited (OCL) to prepare an application for a Bespoke Environmental Permit Variation Application for their site located at Unit 6 , Ennerdale Road , Blyth , Northumberland , NE24 4RT.

This non-technical summary provides a summary of the regulated facility, an explanation of exactly what is being applied for, and a summary of the key technical standards and control measures that will be implemented at the site as a result of the application.

Report Structure

This report describes the operating techniques that are to be implemented at the facility to ensure compliance with the conditions of the Environmental Permit. The report has been drafted to satisfy the requirements of Environmental Agency (EA) Guidance¹ and is divided into the following Sections.

| | |
|-----------|--------------------------|
| Section 1 | Introduction |
| Section 2 | Management |
| Section 3 | Operations |
| Section 4 | Emissions and Monitoring |
| Section 5 | Information |
| Section 6 | Closure |

¹www.gov.uk/guidance/risk-assessments-for-your-environmental-permit

2.0 Management

2.1 Management System

RBG operate their own in-house management system which ensures that;

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

The management system is supplemented by this document which outlines the operating techniques at the site and demonstrates conformance with the requirements of relevant Environment Agency guidance.

2.2 Management Structure and Responsibilities

The Site Manager/TCM is responsible for day-to-day operations and compliance with the Environmental Permit.

Whenever the site is open to receive or dispatch wastes, or will 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 regarding:

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

2.2.1 Technical Competence and Training

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.

Certificates are included within the application for the Technically Competent Manager.

An assessment of staff training needs will be carried out to identify the posts for which specific environmental awareness training is needed, and to determine the scope and level of such training.

The assessment of training needs will be reviewed on an annual basis.

Details of staff training procedures and recording are included in Section 11.2 of the management system.

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

- regulatory implications of the permit for the site and their specific work activity;
- all potential environmental effects from operations under normal and abnormal circumstances;
- the need to report deviations from the permit; and
- prevention of accidental emissions and the action to be taken should accidental emissions occur.

2.2.2 Site Security

Details of site security is included in SOP3.7 of the management system.

In order to prevent unauthorised access, a number of site security measures will be in place at the site including;

- Fencing and gated entrance/exit;
- CCTV in all operational areas; and
- Daily site monitoring.

The site will be inspected at the commencement of each working day. Any defects or damage which compromises the integrity of the enclosure will be made secure by temporary repair as soon as is practicable. Permanent repairs will be affected as soon as practicable.

All inspections, any defects, damage or repairs will be recorded in the site diary.

2.2.3 Permit Surrender

To assist in permit surrender, records will be maintained to demonstrate how the land beneath the site has been protected at all times between the date of permit issue and the end of permit operations.

Records to be maintained will include:

- maintenance of site surfacing;
- maintenance of site infrastructure and offices/storage containers;
- maintenance of drains and sumps; and
- actions taken to clean up incidents and spillages.

2.2.4 Display of Environmental Permit

A copy of the Environmental Permit will be kept available for reference by all staff and contractors whose work may have an impact on the environment. All staff will be informed where the Environmental Permit is kept.

2.2.5 Managing Documentation and Records

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

The documents that will be included within the scope of the controls are as follows:

- policies;

- responsibilities;
- maintenance records;
- procedures;
- monitoring records;
- results of audits;
- results of reviews;
- complaints and incident records; and
- training records.

Records will be made and kept up to date on a daily basis to reflect deliveries, on site treatment and dispatches. All records relating to waste acceptance will be maintained and kept readily available on site and kept for a minimum of 2 years after the waste has been removed off site.

2.2.6 Reporting Non-Compliance and Taking Corrective Action

Procedures as detailed in SOP 3.25 will ensure appropriate corrective action is taken in response to problems identified at the site. The procedure will ensure that non-conformances are reported, investigated and rectified, and that failures and weaknesses are prevented. The following aspects will be considered:

- actual or potential non-compliance;
- system failure discovered at internal audit;
- suppliers or subcontractors breaking the agreed operating rules;
- incidents, accidents, and emergencies;
- malfunction, breakdown or failure of plant;
- other operational system failure; and
- complaints.

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

- obtaining additional information on the nature and extent 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 (as applicable).

2.2.7 Auditing and Legal Compliance

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

The frequency and nature of the audits is outlined in SOP3.8.

2.2.8 Monitoring, Measuring and Reviewing Environmental Performance

A formalised management structure will review environmental performance, and ensure any necessary actions are taken.

The nature of these reviews is outlined in Section 2 of the EMS.

2.2.9 Operational Control, Preventative Maintenance and Calibration

The management system will complement operational procedures so as to ensure effective control of site 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.

The relevant procedures are contained in SOP 3.19 of the EMS.

2.2.10 Design and Construction Quality Assurance

All relevant elements of the site (not already constructed) 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 where appropriate to provide an adequate audit trail.

A competent and suitably qualified person will supervise the construction activities.

2.3 Accident Management Plan

The company recognises 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 site to ensure the site and site 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.

The accident management plan is included in SOP 3.18 of the EMS.

2.3.1 Hazard Identification

The following accident hazards have been identified from the Environment Agency's Generic Risk Assessments;

- Unauthorised Waste Acceptance;
- Flooding;
- Arson and/or Vandalism;
- Accidental Fire; and
- Spillage of Liquids.

The company will employ a number of measures to prevent the realisation of these hazards to the environment and human health.

2.3.2 Unauthorised Waste

Acceptance of unauthorised materials has the potential to cause harm to the environment and human health for example the receipt of dusty wastes could impact the amenity of the site's neighbours. All wastes received at the site will be subject to inspection and checking against the declaration on the waste transfer note. In the event that unauthorised waste is delivered to the site, the waste will be segregated and stored in a designated quarantine area within the site prior to export from site to a suitably permitted facility for recovery or disposal.

The waste acceptance procedures are included in SOP 3.3 of the EMS.

2.3.3 Fire Prevention

The risk of accidental combustion of the waste types accepted at the site is low. Notwithstanding this, to prevent and minimise the potential impact of fire, a brief summary of the measures which will be employed is as follows:

- incompatible materials will not be accepted at the site;
- the plant inspection schedule will include checks of electrical equipment within the site to ensure that any faults are identified and repaired;
- fire extinguishers will be provided at designated locations;
- smoking will not be permitted in the operational areas of the site;
- working practices will ensure the assessment of fire hazards and training of employees in fire prevention, e.g. the use of fire extinguishers and emergency procedures; and
- no wastes will be burned on the site and any fire at the site will be treated as an emergency.

In the event of a major fire, the following action will be taken:

- the Operator/Site Manager and Fire Brigade will be notified immediately and the Environment Agency as soon as practicable;
- the burning area will be isolated, and attempts will be made to extinguish the fire utilising the onsite fire extinguishers if safe to do so; and
- the site and offices/welfare areas will be evacuated.

2.3.4 Loss of Containment

Loss of containment could 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 will be implemented:

- *Containment system:* any facilities for the storage of oils, fuels or chemicals will be sited above ground on impervious bases and surrounded by impervious bund walls. The volume of the bunded compound will be at least the equivalent to the capacity of the tank plus 10%. All filling points, vents and gauges will be located within the bund. No oils or fuel are stored in any of the permitted areas.
- *Storage tanks:* any storage tanks will be constructed to the appropriate British Standard;
- *Inspection:* storage tanks will be inspected visually on a daily 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 on site; and
- *Monitoring techniques:* the site staff will undertake daily monitoring for evidence of spillage and leakage.

In the event of any potentially polluting leak or spillage occurring on 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 site and disposed of at a suitably permitted facility. The incident will be logged in the site diary.
- Any dry wastes spilled on site 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 Environment Agency will be informed.

The spillage procedure, included in Section SOP3.17 of the EMS, details further information in regard to spillages on site.

2.3.5 Security and Vandalism

As detailed in SOP3.7 Security Management the following security measures are in place;

- *Site perimeter*: the site benefits from fencing around the whole site perimeter (land boundaries);
- *Inspection*: gates and perimeter fencing around extending around the site will be inspected regularly by the operations staff to identify deterioration and damage, and the need for any repairs;
- *Maintenance and repair*: fencing and gates will be maintained and repaired to ensure their continued integrity. In the event that damage is sustained repairs will be made by the end of the working day. If this is not possible, suitable measures will be taken to prevent any unauthorised access to the site and permanent repairs will be affected as soon as practicable;
- *Authorised access system*: all visitors to the site will be required to register in the visitor's book and sign out again on exit to minimise the risk of unauthorised visitors being present on site; and
- *Monitoring techniques*: operational procedures, including regular inspections will ensure continual monitoring of security provision at the site;
- *CCTV*: is installed at the entrance of the site.

In the event of a breach of security at the site, the cause will be investigated, and appropriate mitigation measures implemented. Records to be maintained include inspections and maintenance of security fencing and gates, breaches of security, investigations and actions taken.

2.3.6 Flooding

The site is not identified to be in a flood risk area.

3.0 Operations

3.1 Process Description

Wastes will be accepted in accordance with waste acceptance procedures set out below.

3.2 Current Permitted Activities

The site is currently permitted authorised under permit EPR/KB3209KR/A001 as an S0810 No 10: Inert & Excavation Waste TS.

The current permit does not allow any mechanical treatment of waste. The permit is also undergoing an Agency Led version to reduce the current permitted area in respect to the location of the site. The site is located within 500m of a Special Protection Area (pSPA or SPA) and 500m of Sites of Special Scientific Interest (SSSI).

This application is to vary the current permit from the Standard Rules set to a Bespoke Permit to allow mechanical and manual treatment on site, include additional inert non-hazardous waste EWC codes and increase the permitted area back to the original permitted area.

Operations, wastes and activities are modelled on a Standard Rules set SR2010 No12.

The Bespoke application is applicable based on the location of the site to the above referenced receptors.

EWC codes and recycling activities are shown in Appendix A of the NTS document.

3.3 Waste Acceptance

3.3.1 Permitted wastes and annual tonnage

The company wish to accept the below EWC codes, no more than 75,000 tonnes per annum.

| Exclusions | |
|---|---|
| <p>Wastes having any of the following characteristics shall not be accepted:</p> <ul style="list-style-type: none"> • Consisting solely or mainly of dusts, powders or loose fibres • Hazardous wastes • Wastes in liquid form | |
| Waste Code | Description |
| 01 | WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS |
| 01 04 | wastes from physical and chemical processing of non-metalliferous minerals |
| 01 04 08 | waste gravel and crushed rocks other than those mentioned in 01 04 07 |
| 01 04 09 | waste sand and clays |
| 02 | WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING |
| 02 02 | waste from preparation and processing of meat, fish and other foods of animal origin |
| 02 02 02 | shellfish shells from which the soft tissue or flesh has been removed 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 |
| 03 03 | wastes from pulp, paper and cardboard production and processing |
| 03 03 01 | waste bark and wood |
| 10 | WASTES FROM THERMAL PROCESSES |
| 10 01 | waste from power stations and other combustion plants |
| 10 01 01 | bottom ash and slag only |
| 10 01 02 | pulverised fuel ash only |
| 10 01 05 | gypsum (solid) only |
| 10 01 07 | gypsum (sludge) only |
| 10 01 15 | bottom ash and slag only from co-incineration other than those mentioned in 10 01 14 |
| 10 11 | wastes from manufacture of glass and glass products |
| 10 11 12 | clean glass other than those mentioned in 10 11 11 |
| 10 12 | wastes from manufacture of ceramic goods, bricks, tiles and construction products |
| 10 12 08 | waste ceramics, bricks, tiles and construction products(after thermal processing) |
| 10 13 | wastes from manufacture of cement, lime and plaster products and articles and products made from them |

| | |
|--------------|--|
| 10 13 14 | waste concrete only |
| 15 | WASTE PACKAGING |
| 15 01 | packaging |
| 15 01 07 | clean glass only |
| 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 02 | clean glass only |
| 17 03 | bituminous mixtures, coal tar and tarred products |
| 17 03 02 | road base and road planings (other than those containing coal tar) only |
| 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 06 | dredging spoil other than those mentioned in 17 05 05 |
| 17 05 08 | track ballast other than those mentioned in 17 05 07 |
| 17 08 | gypsum based construction material |
| 17 08 02 | gypsum only other than that mentioned in 17 08 01 |
| 19 | WASTES FROM WASTE MANAGEMENT FACILITIES, OFF SITE WASTE WATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION / INDUSTRIAL WASTE |
| 19 05 | wastes from aerobic treatment of solid waste |
| 19 05 03 | compost from source segregated biodegradable waste only |
| 19 08 | wastes from waste water treatment plants not otherwise specified |
| 19 08 02 | washed sewage grit (waste from desanding) free from sewage contamination only |
| 19 08 99 | stone filter media if free from sewage contamination only |
| 19 09 | wastes from the preparation of water intended for human consumption or water for industrial use |
| 19 09 02 | sludges from water clarification |
| 19 12 | wastes from the mechanical treatment of wastes |
| 19 12 05 | clean glass only |
| 19 12 09 | minerals (for example sand, stones) |
| 19 12 12 | treated bottom ash including IBA and slag other than that containing dangerous substances only |
| 19 13 | wastes from soil and groundwater remediation |
| 19 13 02 | solid wastes from soil remediation other than those mentioned in 19 13 01 |
| 19 13 04 | sludges from soil remediation other than those mentioned in 19 13 03 |
| 20 | MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS |
| 20 01 | separately collected fractions |
| 20 01 02 | clean glass only |
| 20 02 | garden and park wastes |
| 20 02 02 | soil and stones |

3.3.2 Hours of Operation

The facility will be open to receive wastes and operate between the following hours, in line with the current planning permission.

- Monday to Friday 8am till 5pm
- Saturdays 8am till 1pm
- Closed Sunday/Bank Holidays

3.3.3 Load Inspection and Waste Control

All vehicles bringing waste material to the site will report to the site office where the load will be visually inspected if possible, in order to confirm its description and composition against the relevant waste transfer note, and other accompanying documentation. All wastes will undergo a further visual inspection during deposition within the stockpile area.

Wastes will only be accepted at the site if the description in the accompanying documentation is in accordance with the permit and that onsite inspection confirms waste is consistent with the description provided.

Should the wastes be found not to conform during the initial visual inspection, then the details will be recorded and the vehicle turned away. Should wastes already be discharged within the stockpile area and deemed not to conform or otherwise not be permitted then the waste will be picked out and:

- reloaded on to the delivery vehicle; or
- removed to a designated quarantine area as appropriate

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

Wastes will not be accepted unless the site is adequately resourced to receive the waste.

A record will be kept in the site diary of all rejected wastes. The waste producer and the Environment Agency will be notified of significant non-conformance.

3.3.4 Means of Measurement

The quantity of waste accepted and despatched from the facility will be measured via the onsite use of the public weighbridge.

All wastes entering the site will be recorded upon arrival and the waste and recyclable components removed from site for disposal for further recovery or reuse will also be recorded on exit.

3.4 Waste Storage

Maximum waste storage on site at any one time will be managed in accordance with the site Environmental Management System, DEMP and WRAP protocol.

All wastes are controlled with acceptance direct into bays for control and containment purposes. Bays are constructed of interacting leg blocks all at a height of 2.4m (inside fencing) then panelled at a height of 4 or 4.4m to contain waste stockpiles and to stop wind whipping.

A freeboard of 0.5m is in place for all stockpiles of wastes to prevent overtopping and loss of containment. The freeboard is marinated using markers to direct staff and to check and maintain compliance.

All wastes are stored and treated on an impermeable surface with sealed drainage.

3.5 Waste Treatment

The company wish to recover non-hazardous wastes derived from household and construction ,industrial sources arising from groundwork activities.

Waste are processed under the WRAP Protocol to produce 6F5 and Type 1 concrete and other qualifying products.

Soils are processed for resale where applicable.

All operational areas of the site are comprised of impermeable concrete surfacing. Site surfacing is checked daily and repairs made where necessary.

Enclosure of the site is in place using bays are constructed of interacting leg blocks all at a height of 2.4m (inside fencing) then panelled at a height of 4 or 4.4m to contain waste during treatment, and to stop wind whipping.

Equipment

Only site personnel that have been trained to operate plant are authorised to process the feedstock material. Equipment should be inspected for defects prior to use.

Screener

Establish final product specification so that correct size screen meshes are fitted prior to production commencement.

Material fed into the screener should be slowly tipped onto the griddle bars. The operative checks that the material is being screened correctly by visually examining the material leaving the conveyors. If the material is not being screened correctly, then all stockpiles beneath the conveyor should be placed into the appropriate storage bay for future processing. All screening is to stop until the problem has been rectified by the Fitter.

The site operative will remove the stockpiles produced by the screener by loading shovel to the appropriate storage bay.

Crusher

Establish final product specification so that crusher jaws are set correctly prior to production commencement.

A machine operator will load the crusher with a 360 degree excavator and a ground based operative will visually observe the entry of the material into the crushing plant. He will remove by hand at the discharge end of the crusher any foreign material observed and place in the appropriate skip for disposal or recycling. Water suppression i.e. fitted spray bars will be used to help suppress produced dust.

The site operative will remove the stockpiles produced by the screener by loading shovel to the appropriate storage bay.

Treatment Parameters

| When located within groundwater Source Protection Zones 1 or 2 the specified wastes below shall be stored and treated on an impermeable surface with a sealed drainage system. | |
|---|---|
| When located outside groundwater Source Protection Zones 1 or 2 all permitted wastes shall be stored and treated on hard-standing or on an impermeable surface with sealed drainage system. | |
| Waste Code | Description |
| 03 01 01 | waste bark and cork |
| 03 03 01 | waste bark and wood |
| 10 01 01 | bottom ash and slag only |
| 10 01 05 | gypsum (solid) only |
| 10 01 07 | gypsum (sludge) only |
| 10 01 15 | bottom ash and slag only from co-incineration other than those mentioned in 10 01 14 |
| 17 05 06 | dredging spoil other than those mentioned in 17 05 05 |
| 17 08 02 | gypsum only other than that mentioned in 17 08 01 |
| 19 05 03 | compost from source segregated biodegradable waste only |
| 19 09 02 | sludges from water clarification |
| 19 12 12 | treated bottom ash including IBA and slag other than that containing dangerous substances |
| 19 13 02 | solid wastes from soil remediation other than those mentioned in 19 13 01 |
| 19 13 04 | sludges from soil remediation other than those mentioned in 19 13 03 |

3.6 Site Infrastructure and Equipment

3.6.1 Site Identification Board

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

The identification board will be inspected at least once per week. In the event of damage or defect that significantly affects the legibility of the board it will be repaired or replaced within a timescale agreed with the Environment Agency.

The board will display the following information:

- Site name and address;
- Permit holder;
- Permit number (s);
- Emergency contact name and telephone number;
- Environment Agency national telephone numbers; and
- Days and hours site is open to receive waste.

3.6.2 Plant and Equipment

All items of plant and equipment used on site will be maintained in accordance with manufacturer's recommendations.

4.0 EMISSIONS AND MONITORING

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

4.1 Surface Water and Groundwater

The site will accept permitted wastes only and will be operated to prevent fugitive emissions to surface water and groundwater.

4.1.1 Engineered Containment

All inert waste can be stored on concrete or hard standing.

There are no drainage features on site to allow any emissions to the external NWL drainage system, other than any surface run off from the site entrance.

The permit is based on a Standard Rules set (SR2010 no 12) which allows wastes to be stored on hardstanding or concrete surfacing due to the type of waste accepted on site.

“ When located outside groundwater Source Protection Zones 1 or 2 all permitted wastes shall be stored and treated on hard-standing or on an impermeable surface with sealed drainage system”

The site surfacing on site is currently made up of concrete areas and hardstanding with the operator wanting to concrete the remainder of the site in the next few months to maintain the quality of site surfacing through vehicle movements and waste management activities. The site entrances/exits will have a 100mm concrete bund to retain any surface water within the permitted area and whole site will benefit from 2.4 sealed concrete block bay walls around the whole site. By concreting site surfaces this enable effective housekeeping and surface management reduce the risk of any mud/debris emissions from the site.

Further infrastructure is to be implemented in the future, such as a sealed sump, installed to collect surface water and water from any vehicle power washing. The sump will be fitted with a silt system with water being reused on site to reduce raw material usage. The risk and monitoring of this system will be assessed at the time of installation and managed in accordance with the EMS.

Clean surface water area in on site from office roofs and storage containers will be collected and reused on site for cleaning site surfaces and dust suppression.

Water arising on site from dust suppression system (browsers and water spray systems) will be retained on site within the waste, product or within the site via the sealed concrete system.

4.1.2 Containment Bunding

All potentially polluting materials for example oils and fuels will be stored in containers provided with secondary containment. Containers and secondary containment will be impermeable, resistant to the stored materials and constructed to the appropriate British Standard.

Containers will be surrounded by a leakage containment bund capable of containing at least 110% of the volume of the largest container within the bund or 25% of the total container volume within the bund, whichever is the greater.

Pipework will be routed within bunded area ensuring no penetration of the secondary container. Tanker connection points will be within the bund.

Containers/Tanks will be inspected visually on a daily basis by the site staff to ensure the continued integrity of the containment and identify the requirement for any remedial action.

4.2 Odour

No putrescible or readily degradable wastes will be accepted at the site. Due to the strict control of the waste that will be accepted at the site, odour is not expected to pose a significant risk.

4.3 Dust

No waste consisting solely or mainly of dusts, powders or loose fibres will be accepted at the site. Due to the types of waste accepted and the strict control of the waste that will be accepted at the site, dust is not expected to pose a significant risk.

All wastes are controlled with acceptance direct into bays for control and containment purposes. Bays are constructed of interlocking leg blocks all at a height of 2.4m (inside fencing) then panelled at a height of 4 or 4.4m to contain waste stockpiles and to stop wind whipping.

A freeboard of 0.5m is in place for all stockpiles of wastes to prevent overtopping and loss of containment. The freeboard is marked using markers to direct staff and to check and maintain compliance.

In the event the generation of dust occurs during storage or treatment of wastes, this will be monitored and mitigation methods such as dampening will be employed to reduce the risk of fugitive dust emissions.

These wastes will not be stored longer than 48 hours unless otherwise agreed with the Environment Agency.

Daily site inspections will be carried out by site staff during the course of their normal working activities.

The procedure for managing complaints is included in SOP3.20 of the EMS.

The management of dust emissions is detailed in the site specific DEMP.

4.4 Noise

Waste acceptance operations will only be carried out during operational hours. All equipment will be maintained and operated in accordance with manufacturer's guidance and will be maintained in good working order.

The site will be operated so as to minimise noise emissions from the site. Measures that will be taken at the site include:

- locating plant away from noise-sensitive receptors where possible;
- the avoidance of dropping materials from height;
- switching plant off when not in use;

- the imposition of a speed limit for vehicles delivering waste to the site. The site has 10mph Speed Limit This will reduce noise associated with high engine speeds;
- the training of all personnel in the need to minimise site noise, and will be responsible for monitoring and reporting excessive noise when carrying out their everyday roles;
- regularly maintaining site plant and machinery to minimise noise resulting from inefficient operation of pumps, generators and engines;
- in the event that reversing alarms are found to give rise to complaints, alternative alarms or technology will be investigated;
- the regular maintenance of site surfaces to prevent the development of potholes will significantly reduce the noise generated particularly by empty vehicles exiting the site;
- consideration will be given to the fitting of noise suppression kits on items of plant and equipment; and
- all plant will be maintained in accordance with manufacturer's recommendations to minimise noise emissions.

Any complaint received will be logged in the site diary. The Site Manager will investigate the complaint and will take action to identify the source of the noise and implement remedial measures where appropriate.

The measures employed at the site to minimise the emission of noise will be regularly reviewed by the Site Manager and additional measures will be employed where required.

The procedure for managing complaints is included in SOP 3.20 of the EMS.

The management of noise emissions is detailed further in SOP 3.10 of the EMS.

4.5 Pests

Due to the nature of the wastes proposed to be accepted at the site, it is not anticipated that pests will pose a risk at the facility.

The facility will be inspected by both site management and operatives for infestations of pests, vermin and insects on a routine basis.

A specialist pest control contractor will be deployed if required.

The management of pests is further detailed in SOP3.12 of the EMS.

4.6 Litter

Due to the nature of the waste to be accepted on site, it is not anticipated that litter will pose a serious risk. However, the boundary of the site and its environs will be regularly checked and any litter and clean it up. The site will benefit from a perimeter fence which will limit the potential for litter to escape off-site.

It will be the responsibility of the site staff to monitor the site for any signs of escaping materials either from within the site or from vehicles delivering or removing materials to and from the site.

Inspections will be carried out on a daily basis and a record maintained within the site diary.

The management of litter is detailed further in SOP 3.13 of the EMS.

4.7 Mud and Debris

The top section of the road site is surfaced with concrete, tarmac and hardstanding and fully drained. It is therefore not expected that mud will feature as a problem for the site within the site, the following

measures will be taken in order to prevent the deposition or tracking of mud or debris from the site onto public areas or highways:

- site surfaces will be maintained free of significant quantities of mud
- wheel cleaning facility on site
- all operational areas will be subject to monitoring by staff throughout the working day
- all vehicles leaving operational areas will, before leaving the site be checked to ensure that they are clear of loose waste and that any products being exported from the site are secure.

In the event that mud, debris or waste arising from the site is deposited onto public areas outside the site, the following remedial measures will be implemented:

- the affected public areas outside the site will be cleaned; and
- traffic will be isolated from sources of mud and debris within the site to prevent further tracking of mud and debris, and measures will be taken to clear any such sources as soon as practicable.

5.0 INFORMATION

All relevant notifications and submissions to the Environment Agency regarding the site will be made in writing and will quote the permit reference number and the name of the permit holder.

Records will be 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 shall be kept until permit surrender. Duty of Care records will be kept for a minimum of 2 years with hazardous consignment notes retained for 3 years or the lifetime of the permit.

6.0 Reporting and Notifications

6.1 Environmental Monitoring

The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.

6.2 Changes in Technically Competent Persons

The Environment Agency 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.

6.3 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 Environment Agency within 1 month of the end of the quarter unless otherwise required by the permit conditions.

6.3.1 Relevant Convictions

The Environment Agency will be notified of the following events:

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

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

The Environment Agency 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.

6.3.3 Adverse Effects

The Agency 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, is causing or may cause significant pollution; and
- any significant adverse environmental and/or health effect.

7.0 Closure

This report has been prepared by Olive Compliance Ltd with all reasonable skill, care and diligence, and taking account of the manpower and resources devoted to it by agreement with the client. Information reported herein is based on the interpretation of data collected and has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of RB Groundworks and Fencing Ltd no warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from Olive Compliance Ltd.

Olive Compliance Ltd disclaims any responsibility to the client and others in respect of any matters outside the agreed scope of the work.