

Reference	BPW 1.1.1
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Author	C Murphy

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# Environmental Working Plan

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## Resource & Energy/Industrial & Commercial

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**Biffa Waste Services Ltd.**

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# **POLYMERS WASHINGTON AND I & C SKIP SHED WORKING PLAN**

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## 1. GENERAL CONSIDERATIONS

### 1.1 Scope and Purposes

- 1.1.1 This document describes the management and operational arrangements for the Biffa Waste Services, R&E division Polymers operation and I&C Facility operating at Wilden Road, Pattinson South Industrial Estate, Washington, Tyne & Wear, NE38 8QB.
- 1.1.2 This Working Plan has been produced to support the Environmental Permit in compliance with the requirements of the Environmental Permitting (England and Wales) Regulations 2010 (as amended).

### 1.2 Site Operation / Licence Holder

- 1.2.1 The site operates under Environmental Permit (EP) EPR/EPR/GB3604UQ, which is a consolidation of permits EAWML 67515 and EAWML 103213. This permit is now for the operation and management of a post-consumer waste plastics wash plant and transfer station for household, commercial and industrial material with material treatment and asbestos storage at the specified location. The only permitted inputs of hazardous materials are for asbestos.
- 1.2.2 The operator is Biffa Waste Services Limited (company number **00946107**), whose registered address is:

Coronation Road,  
Cressex,  
High Wycombe,  
United Kingdom,  
HP12 3TZ

Telephone: 0800 307307

### 1.3 Site Location and History

- 1.3.1 The site is located off Wilden Road in an area used principally by commercial and construction-related activities. The A195 Northumberland Way, a major traffic route, runs to the west of the site and Pattinson Way, the principle access route for commercial traffic accessing the industrial estate, around the south and east of the site. The closest residential properties, on Barmston Court, are within 200 metres to the North of the site.
- 1.3.2 The site was previously a building and construction materials depot.

### 1.4 Licence Area

- 1.4.1 The area covered by the Environmental Permit is the outline of the plans attached at Appendices A and B, which cover the whole site. All references to the 'site' in this working plan shall mean these areas and the infrastructure, plant and equipment associated with the site.

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### 1.5 Material Operations

1.5.1 The Environmental Permit allows the acceptance, sorting, treatment and storage of non-hazardous materials across the whole site prior to being sent for further treatment, recovery or disposal. The on-site core activities are divided between two separate facilities referred to as the R&E division Polymers operation, which is a plastics recycling division and the Skip Shed (Material Transfer Station). Interim activities may also be conducted on other areas of the site as required. These interim activities will only be conducted within the permitted area as defined in Appendix A and only in accordance with the specifications defined by the Environmental Permit.

1.5.2 Specified Material Management operations are listed in the table below:

Description of Material Activities	Limits of Activities
<b>D9:</b> Physio-chemical treatment not specified elsewhere in Annex 11A to permit which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12.	Treatment consisting only of manual sorting, separation, screening, blending, baling, shredding, crushing or compaction of material into different components for disposal, (no more than 50 tonnes per day) or recovery.
<b>D13:</b> Blending or mixing material prior to the material being submitted to any of the operations listed in paragraphs 1 to 12 of this part of the Schedule.	The maximum quantity of asbestos material received at the site shall not exceed 10 tonnes per day.
<b>D14:</b> Repackaging prior to submission of any of the operations numbered D1 to D13.	The maximum quantity of asbestos material stored at the site shall not exceed 10 tonnes.
<b>D15:</b> Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced).	There shall be no treatment of asbestos material.
<b>R3:</b> Recycling/reclamation of organic substances which are not used as solvents.	Asbestos must be double bagged and stored in a suitable lockable container on an impermeable surface with a sealed drainage system.
<b>R4:</b> Recycling/reclamation of metals and metal compounds.	
<b>R5:</b> Recycling/Reclamation of other inorganic compounds.	No more than 50 tonnes of intact and shredded material vehicles tyres (material codes 16 01 03 and 19 12 04) shall be stored on the site.
<b>R13:</b> Storage of material pending any of the operations numbered R1 to R12 (excluding temporary storage, pending	Physical treatment including manual and mechanical sorting, separation, screening,

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collection, on the site where it is produced).	baling, shredding, compaction and heat treatment of non-hazardous waste for recovery.
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Activity listed in Schedule 1 of the EP Regulations.	Description of specified activity and WFD Annex I and II operations.	Limits of specified activity.
S5.4 A(1)(a)(ii)	<p>Effluent treatment: Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving one or more of the following activities, and excluding activities covered by Council Directive 91/271/EEC concerning urban waste-water treatment(1) - (ii) Physico-chemical treatment</p> <p>D9: Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D12.</p>	From receipt of effluent into effluent treatment plant, to the discharge to sewer.

1.5.3 Treatment consists of shredding, ferrous removal, density separation by water, wet granulation, material cleaning through a wash reactor, cleaning and rinsing using a turbowasher, flake density separation by Flottweg Sorticanter, lights / label separation using air elutriation, optical sorting of flake and then bagging finished product.

## 1.6 Permitted Material and Quantities

1.6.1 The material types accepted are listed in the Environmental Permit. They are non-hazardous household, commercial and industrial materials: defined in the Controlled Material (England and Wales) Regulation, 2012 and Section 75 of the Environmental Protection Act 1990. The material is from household, commercial and industrial premises.

### 1.6.1 Excluded Materials - the following materials will not be accepted.

All hazardous material as defined under the Hazardous Material (England and Wales) Regulations 2005, apart from bonded asbestos (i.e. insulation materials containing asbestos and construction materials containing asbestos), European Material Catalogue (EWC) codes 17 06 01\* and 17 06 05\*. On receipt this material will be stored in the dedicated asbestos skip in the Hazardous Materials Storage and Quarantine Area to await disposal via an appropriately licenced hazardous material contractor.

The maximum annual throughput of material is up to 500,000 tonnes.

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### 1.7 Hours of Operation

17.1 The site can be operated 24 hours a day, seven days a week.

1.7.2 Core operational hours are:

Receipt of Baled Plastic Material 0700 to 1700 (Monday to Friday only)

0700 to 1700 (Saturdays as required)

Processing of Baled Plastic Material 24 hour operations.

Skip Shed – Day shift only 0600 to 1700 (Monday to Friday only)

0700 - 1200 (Saturdays as required)

### 1.8 Staffing and Management

1.8.1 The site is open for the receipt of material or for other essential operations, such as plant maintenance and training during the hours listed in section 1.7 above.

1.8.2 The site will only be open for the deposit/receipt of material when there is a minimum of 1 x supervisor and 1 x operator available to work within the recycling facility and 1 x operator to manage the transfer station operations.

1.8.3 Roles and responsibilities will be managed by the Site Manager or a nominated representative. Training records for Biffa staff will be held by the respective Biffa management and for contracted staff, by the Contracting Services Company, employed to provide operational staff for the site operations.

### 1.9 Health and Safety

1.9.1 All operations onsite will be carried out in accordance with the **Biffa Group Integrated Management System (GIMS)**.

### 1.10 Fit and Proper Person

1.10.1 Technical Competence – Steve Cormack Operations Manager I & C and **Chris Murphy Regional QSHE Manager Polymers** hold the necessary WAMITAB certificates and provide the required technical management of the site.

1.10.2 Relevant convictions – no director, manager, company secretary or any similar officer or employee of Biffa Material Services have been convicted of any relevant offences.

## 2. SITE INFRASTRUCTURE

### 2.1 Access and Parking

2.1.1 Access to the site is gained from the A195 Northumberland Way via Pattinson Road and then Wilden Road.



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2.1.2 Parking – There is adequate space in the designated parking bays at the front of the main office building for the parking of R&E Division Polymers Operation vehicles associated with the operational activities.

There is facility for I&C operational personnel to park vehicles in the ‘overflow’ car park which is east of the main office building.

There is also specific on-site parking for disabled drivers and deliveries.

## 2.2 Notice Board and Signs

2.2.1 The site Notice board is positioned at the site entrance and displays the following information:

- Site Name and address
- Licence Holders Name
- Environmental Permit number
- Emergency contact name and telephone number
- Statement that the site is authorised by the Environment Agency
- Environment Agency emergency national telephone number 0800 807060 and general enquiries 03708 506 506

2.2.2 Other site signs include:

- No smoking
- Speed limits
- Quarantine area
- Site traffic instructions
- Designated walkways

## 2.3 Site Security

2.3.1 There are metal and concrete fences around the front of the site with closed access gates. The site boundaries are enclosed by secure fencing and concrete walls. In some places metal containers have been utilised to construct a secure site boundary.

2.3.2 CCTV is in operation on site to monitor operational activities outside and within the main wash plant building, which is monitored by the site manager.

2.3.3 During periods of plant shutdown (Christmas break) a security guard patrol is in operation.

## 2.4 Site Office

2.4.1 The Site Office is located within the main weighbridge office of the recycling facility as shown on the plan in Appendix A.

2.4.2 The site records are maintained and kept within the site office or in electronic format and are available for inspection if required. The list below details the relevant site documents which will

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be kept for at least 6 years.

- Environmental Permit and supporting application details;
- Working Plan;
- Site Diary;
- EA Compliance Assessment Reports (CARs);
- In-house daily and weekly inspection sheets;
- Duty of Care Transfer Notes (at least 2 years);
- Consignment Notes (at least 3 years);
- Hazardous (contraries) material logs;
- Material delivery tickets;
- Weighbridge tickets;
- Visitor Book;
- Accident Book;
- Staff competency / training records; and
- Permit to work system.

2.4.3 The following documents will be kept until the Environmental Permit is surrendered:

- Records associated with any off-site pollution incident where effects are alleged to have caused environmental harm or human health effects;
- Design, construction and maintenance records; and
- Details of any non-conformance including spillages and incidents.

## 2.5 Weighbrige

2.5.1 An inbound weighbridge is located at the entrance to each part of the site (Polymers Facility and Skip Shed) to measure the vehicles incoming material loads.

The I&C and R&E traffic movements no longer interact and run under separate traffic management plans, with the I&C operations having a single weighbridge for in / out weighing, and the R&E operations having separate in and out weighbridges.

2.5.2 All weighbridges are connected to Integrated Material Systems (IWS) material management software. This stores information such as registration, the company the vehicle operates under, all weights, times, dates etc. This ensures all material is recorded for a full audit trail.

## 2.6 Fuel and Chemical Storage

2.6.1 Any liquid fuels or chemicals stored on site will be in mobile storage containers or steel drums. The bulk LPG tank for refuelling of Forklift gas cylinders is located the required separation distances from boundaries, drains and electrical routes, and is suitably protected against impact by dedicated barriers.

Liquid / chemical containers will be double skinned, stored within bunded areas or on drip trays. The location may vary depending on operational need. Gas bottles will be stored in secure gas bottle storage cages, located on site.

2.6.2 The full controls of refuelling activities are covered in the DSEAR Risk Assessment 26 - Storage and Handling of Fuel.

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## 2.7 Material Transfer, Treatment and Storage

2.7.1 All material recycling operations will take place within designated areas only. The Polymers facility stores baled post-consumer waste HDPE and PP sourced from (largely) Biffa MRFs and PRFs. This material is recycled through the wash plant, converting it into cleaned washed PP or HDPE 'Jazz' flake, a secondary raw material. The finished flake is also stored within the main warehouse.

2.7.2 All designated processing buildings have impermeable concrete surfaces.

2.7.3 Hazardous Materials – An allocated quarantine area is located within the aggregates storage area and is to be used for material, which cannot be removed from site immediately. The location of the Quarantine area is shown on the plan at Appendix B.

2.7.4 The process for accepting material and dealing with hazardous material is described in the material acceptance flowchart at Appendix D.

## 2.8 Drainage

2.8.1 All material handling and storage will be conducted on hard standing or on impermeable surface.

## 2.9 Vehicles, Plant and Equipment

2.9.1 All plant and vehicles employed on the site are regularly serviced by our in-house engineering Team and specialist contactors, to ensure that they are in first class order and in compliance with relevant legislation, such as the Provision and Use of Work Equipment Regulations (PUWER) 1998 and Lifting Operations and Lifting Equipment Regulations (LOLER) 1998.

2.9.2 Site plant operatives carry out daily plant maintenance checks on all plant including forklifts, and MEWPs. Any issues detected during the inspection of vehicles will result in.....

2.9.3 All plant inspection and examination certificates are electronically stored which indicate when re-inspections are required to ensure no plant is in operation without a valid certificate.

2.9.4 Site managers and the Safety Manager will regularly inspect plant to ensure that operational safety systems are working correctly.

2.9.5 All operators are trained and regularly assessed by external organisations such as Linde to ensure competency in the management of plant and machinery.

## 3. SITE OPERATIONS

3.1 Preliminary Procedures

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- 3.1.1 Guidance is given by the site management to all employees, subcontractors, other material carriers and customers regarding material types that are acceptable at the site. The material arriving on site is predominantly delivered using Biffa vehicles or contracted hauliers who hold current waste carriers registration certificates, or by Local Authority vehicles. Details are taken for all new haulage operations bringing material to site and the details are periodically checked with the EA to ensure registration.
- 3.1.2 For skip services Biffa Waste Services (BWS) staff check all loads prior to uplift to ensure that the contents comply with the details of the material ticket and the material permitted by the Environmental Permit EP.
- 3.1.3 Any non-conformances will be recorded and the rejection procedure outlined in Para 3.3 below followed.

## 3.2 Receipt of Loads

- 3.2.1 All incoming vehicles are required to drive onto the relevant inbound weighbridge where the weighbridge attendant will enter the vehicle registration and the details of the material that the vehicle is carrying onto the system.

- 3.2.2 The vehicle is then directed to the relevant tipping area for the particular material stream.

### 3.2.3 Plastic Baled Material (PET, HD Jazz, PP Jazz)

- 3.2.4 **Incoming** - The driver accesses the incoming weighbridge and a reading of the total weight is taken, together with a record of material type. The vehicle is then directed to the correct unloading area, where it is parked and unloaded following site procedures. Once unloaded the vehicle accesses the outgoing weighbridge and a new reading taken. Weighbridge tickets will be issued to drivers once both readings have been taken.

- 3.2.5 **Outgoing** - The driver accesses the incoming weighbridge and a reading of the total weight is taken. The vehicle is then directed to the correct loading area, where it is parked and unloaded following site procedures. Once loaded the vehicle accesses the outgoing weighbridge and a new reading taken. Weighbridge tickets will be issued to drivers once both readings have been taken.

### 3.2.6 Skip Material Reception Area

- 3.2.7 The driver is directed over the inbound weighbridge where an inbound ticket is created. The driver is then directed to an available tipping bay inside the transfer building, where the load is checked to ensure its compliance before approval is given for it to be deposited and added to the current material stockpile. Large items such as woods and scrap metal, which may cause damage to the vehicle trailers are removed and stored separately and any non-recyclable items such as tyres and WEEE items are segregated for disposal to landfill. Should any load be non-compliant then the procedure outlined in the Material Acceptance flowchart is to be followed.

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- 3.2.8 Once tipped the vehicle then continues on the designated route to the outbound weighbridge where the weighbridge attendant enters the vehicle registration, the system then shows the held inbound ticket and calculates the vehicle's net weight. A computerised weighbridge ticket is produced and the driver is given the top copy. The weighbridge ticket includes the following:
- Facility address;
  - Date and time;
  - Gross weight;
  - Tare weight;
  - Net weight;
  - Registration;
  - Material stream; and
  - Signatures from both the weighbridge attendant and the vehicle driver.

3.2.9 The remaining two copies of the ticket are then stored, ready for the daily reporting procedure.

3.3 If the maximum storage capacity of the site is reached then no further material will be accepted until material can be removed from site and taken to a suitably licensed or exempt material management facility.

3.3.1 The hard-core segregated and stored on site will be processed using a crusher and screener with segregated output materials stored in separate areas prior to removal from site. The crushing plant has an in-built dust suppression system installed which will be utilised to ensure emissions are minimized. Stock piles will be regularly checked throughout the day and mobile suppression units will be used if and when required.

### 3.4 Checking Loads

3.4.1 If material does not meet the description stated on the material transfer note the customer will be advised to check the note and give a more detailed description of the material. If the more detailed description of the material reveals that the material is not permitted then the customer will be advised to contact the Environment Agency to find an alternative site.

3.4.2 The nature of commercial material means full inspection is difficult until the load is deposited. If unauthorised material or 'contrary' is discovered after the deposit, then the person discovering it contacts the Site Supervisor or the Site Manager and the load is to be moved to the quarantine area and arrangements made for it to be removed from site.

### 3.5 Material Recycling

3.5.1 The main purpose of a Recycling Facility is to allow material streams to be sorted into material materials that can be recycled. This reduces the need for landfill and for the use of virgin materials.

3.5.2 The material transfer station is used to bulk store material before it is moved to other facilities where it is sorted into materials that can and cannot be recycled.

### 3.6 Material Collection (Outgoing Material)

3.6.1 When a collection vehicle arrives on site the driver is instructed to report to the site office

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where all relevant documentation is completed and the vehicle is passed to load the material and transport it the disposal/treatment site.

- 3.6.2 All material disposal outlets are checked for suitability against Duty of Care requirements prior to arriving at site.

#### 4. ENVIRONMENTAL CONTROL, MONITORING AND REPORTING

##### 4.1 Breakdown and Spillages

- 4.1.1 In the event of breakdown of the loading plant an alternative loading shovel will be brought on site until it is repaired unless the repair can be carried out quickly without causing the operations of the site to breach any EP conditions.
- 4.1.2 The surface of the material transfer bays will be cleared of all material at least once every 31 days to allow inspection of the site surface, push walls etc. and to carry out any necessary repairs.
- 4.1.3 Any spillages will be cleared immediately by depositing absorbents on the affected area. The absorbents will then be placed in a suitable container in the Hazardous Materials Storage and Quarantine Area, prior to being taken to a suitably licenced site for disposal
- 4.1.4 Any breakdown of plant that could lead to a breach of EP conditions and any spillage will be reported to the EA as soon as is practically possible

##### 4.2 Site Inspections and Maintenance

- 4.2.1 Site inspections and Maintenance are conducted as per frequencies defined in the Group Integrated Management System (GIMS).  
Shift Production Manager or a person who is familiar with the requirements of the working plan and EP for the site, i.e. Site Supervisor. All details of defects, problems and repairs carried out will be recorded on the form on the day that each event occurs. Detailed comments may also be recorded in the site diary. All repairs of defects that pose a risk to the environment will be carried out within 5 working days unless agreed otherwise with the Environment Agency.
- 4.2.2. All repairs to site security fencing will be made within 5 working days of the discovery of the damage and the site will be made secure until the repair has been affected.
- 4.2.3 Any major defects found during the daily site inspection which are likely to lead to a breach of permit conditions will be repaired by the end of the working day in which they are found where possible. If a repair is not possible by the end of the working day the Environment Agency will be contacted to agree a suitable time-scale for repair.
- 4.2.4 All vehicle/ plant maintenance will be carried out where appropriate and any spillages will be dealt with as per the spillage procedure.

#### 5. AMENITY CONTROL

##### 5.1 Control of Mud and Debris

- 5.1.1 Mud on roads - The surfacing of the entire operational area of the site is concrete hard standing.

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restrict use of the dust control measures listed in Section 5.2.1 significantly reduces the risk of mud deposition on the approach roads.

- 5.1.2. Road vehicles will not track through areas where material is stored. However, the deposit of material on the public highway will be treated as an emergency and will be cleaned with a mechanical vacuum sweeper, or similar, immediately.

## 5.2 Control and Monitoring of Dust

- 5.2.1 All site operations will be carried out to minimise the creation of dust. If required a hosepipe or mist air system may be used within the material transfer station building and any other areas that may be prone to dust.

- 5.2.2 The process for storing material and the quantity stored will ensure that the potential of dust related issues are minimised.

- 5.2.3 Sheeting of vehicles - vehicles carrying potentially dusty loads off site will be securely sheeted before leaving the site. Other loads will be sprayed with water if necessary, to reduce any dust emissions.

- 5.2.4 The following measures are implemented to avoid dust:

- (i) a powered road brush/washer will water-down and brush the site transport routes twice daily;
- (ii) Concrete hard standings act as a manageable surface for vehicular traffic and reduce the generation of dust on the site it will also prevent any potential run off of sediment;
- (iii) Site managers also carry out daily monitoring of sites.

## 5.3 Litter Control

- 5.3.1 The site is inspected daily when the site is in operation and debris will be swept as required.

- 5.3.2 Any litter which does escape and is captured by the site fence will be removed before the end of the working day that it is discovered.

- 5.3.3 Sheeting of vehicles – all vehicles carrying loads off site will be securely sheeted before leaving the site. Other loads will be sprayed with water, if necessary, before leaving the site to reduce aerial emissions

- 5.3.4 The following measures are implemented to minimise litter:

- Materials will be baled and/or stored in designated secure bays which will contain the material to reduce any potential wind disturbance causing litter/pollution.
- All wagons/trailer units and skips leaving site will at all times be appropriately sealed/sheeted to prevent escape of dusts/materials.
- Regular housekeeping is carried out by operatives, including the picking of any stray litter which may have escaped during high winds.

## 5.4 Control of Pests, Birds and Scavengers

- 5.4.1 Rat Control - rat control on site is controlled in the first instance by good housekeeping

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measures, such as regular material rotation, segregation of stored bales and complete clearing of bays during periods allocated for cleaning. This is photographed and recorded.

- 5.4.2 In addition, poison bait boxes are supplied and maintained by a professional environmental pest control contractor. These boxes are located throughout the site. The boxes are replenished on a monthly basis and any rat corpses are removed for hygienic disposal
- 5.4.3 The location of the rat bait boxes is recorded by the pest control contractor. These bait boxes have been placed around the site to cover the site entrance, canteen facilities, main office block, and access points to the Process Facility.
- 5.4.4 Bird Control – To mitigate nuisance good house-keeping practices will be adopted, together with the use of the following bird-scaring techniques.
- If required a suitable pest control contractor will be appointed to control scavenging bird populations. These include but are not limited to the use of bird scaring acoustic devices and bird kites mimicking birds of prey as a deterrent.
  - The appointed pest contractor may also employ additional controls, if deemed necessary, which may include utilising trained falcons and hawks to deter birds and gulls from scavenging during operational hours.
- 5.4.5 Fly control – fly numbers are controlled in the first instance by good housekeeping measures, such as regular material rotation and complete clearing of bays as described in 5.4.1. In addition, supervisors continually monitor the number of flies and regular spraying of pesticide is conducted during warmer weather when found necessary.
- 5.4.6 The site will be inspected regularly as part of the daily/weekly site inspection and the presence of any pests noted.

## 5.5 Control and Monitoring of Noises and Vibration

- 5.5.1 It is impossible to remove all noise from the operation of the material site, but everything possible is done to keep noise to an absolute minimum. The following noise control principles are implemented:
- All machinery and plant complies with the relevant noise limits;
  - For any particular job, the quietest plant and/or machinery is used. For example where appropriate and practicable hydraulic shears is used rather than hydraulic impact breakers;
  - All equipment on site is maintained in good mechanical order and serviced in accordance with manufacturer's instructions and fitted with the appropriate silencers, mufflers or acoustic covers;
  - Stationary noise sources (generators or similar) are sited as far as possible from noise sensitive neighboring properties, and where necessary, acoustic barriers are used to shield them;
  - The movement of vehicles to and from the site is controlled and speed limits imposed;
  - Employees are supervised to ensure compliance with the noise control measures adopted;
  - Low noise tools are selected where practicable. Plant, machinery and vehicles are powered-down when not in use;
  - Broadband reverse alarms are used to reduce the travelling distance of noise from vehicles;
  - Regular noise monitoring is completed and the assessment reviewed and acted-upon;

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- The Wash Plant has a shredder, granulator, conveyors, a washing system, air and density separation and optical sorting all powered by electric motors, and the recyclable material is loaded and moved on site by small LPG powered Forklift trucks, to reduce excessive noise produced by the process of recycling the baled material; and
- If any changes to the Polymers Wash Plant recycling process are made, then an independent audit would be carried out to ensure that acoustics are kept to a safe acceptable level.
- The crushing operation to be carried out as described in section 3.3.4 will utilise a 360 excavator loading material into the crushing plant which has in built noise dampeners that ensure potential noise emissions are minimised. The crushing plant will be maintained in accordance with manufacturer's specification and located at the furthest point on site from the nearest receptor.

5.5.2 Complaints – the following procedure shall be followed for all noise complaints.

- (i) As soon as the complaint is received it will be recorded in the Site Complaints Register.
- (ii) An initial response will be made to the complainant. Depending on the nature of the complaint the initial response could be to immediately cease the activity pending investigation, or to replace an item of equipment. However, in some cases it might not be practicable to provide immediate relief. The complainant and Environment Agency will be informed of actions taken. Contact details for regulatory bodies are recorded in the Introduction section of this plan.
- (iii) Where the initial response does not address the complaint, further investigation, corrective Action and follow-up monitoring shall be undertaken as appropriate. The complainant and Environment Agency will be informed of actions taken.
- (iv) All actions will be recorded in the Site Complaints Register and the complaint will then be closed.

## 5.6 Odour Control

5.6.1 All incoming material is subject to the acceptance procedures outlined in Section 3.2 above. If Any material exhibiting offensive odours is deposited on site it will be deposited in the quarantine area or removed from site immediately to a suitable disposal site.

5.6.2 If offensive odours are detected within the site or external complaints are received, then further action will be taken to improve site operations. If this is not sufficient then alternative control methods will be employed such as odour masking sprays.

## 5.7 Control of Fire

5.7.1 Smoking is only permitted within the designated smoking area, which is away from the operational area.

5.7.2 There are no fires allowed on site.

5.7.3 Sufficient firefighting is kept on site, checked and maintained to a serviceable condition.

5.7.4 Any fire at the site is regarded as an emergency and immediate action is taken to extinguish it with the appropriate fire extinguisher, provided that the person feels competent to tackle the fire.



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- 5.7.5 In the event that the fire cannot be tackled with the equipment provided the Fire Service should be called and the fire hydrants shall be utilised.
- 5.7.6 All outbreaks of fire shall be notified forthwith to the Environment Agency.
- 5.7.7 Any flammable gases used in flame cutting equipment are subject to procedures within the Group Integrated Management System (GIMS).
- 5.7.8 Only trained personnel are allowed to undertake burning operations under strict supervision and under the control of a Hot Work Permit. There is strict adherence to stopping burning one hour before the end of the shift, maintenance of standby fire-fighting equipment and fire watchers.
- 5.7.9 Specific risk assessments will be detailed for burning operations.
- 5.7.10 All flammable gas imported for the works are stored in appropriate secure cages in designated areas.

## 5.8 EA Reporting Mechanism

- 5.8.1 Any incidents involving the following where there is an immediate threat to the environment will be reported to the EA as soon as is practicably possible either through a direct line to the Newcastle office or using the national 48 hour line where out of normal office hours;
- Accidents;
  - Incidents (including near misses);
  - Plant breakdowns and malfunction that could have an adverse effect on the environment or human health and could lead to a breach of EP conditions;
  - Material rejection; or
  - Any significant environmental effects including damage to any sensitive receptors and significant impacts on properties.

## 5.9 Environmental Management System

- 5.9.1 Biffa Material Services operates an Environmental System in line with the requirements of the Environmental Permitting Regulations 2010.
- 5.9.2 This Environmental Working Plan may be updated as and when required due to operational change.

## 6. SITE RECORDS

- 6.1 Documented procedures and records for the identification, collection, storage and disposal of material have been established.
- 6.2 The following details are recorded using a Material Transfer Note for every load deposited at the site:
- (i) The date and time of delivery;
  - (ii) The name and address of the material producer;

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- (iii) The type and quantity of material (in tonnes or cubic metres);
  - (iv) The carriers name or driver name;
  - (v) Vehicle registration number; and
  - (vi) Signature of person inspecting material
- 6.3 The details will be entered into a computer system to assist with the production of auditable records of material inputs as required by the Environment Agency.
- 6.4 The following details are recorded for all deposits of unauthorised material at the site and will be forwarded to the Environment Agency if there is an immediate risk to the environment:
- (i) Date and time of deposit;
  - (ii) A description of the material
  - (iii) The quantity of material (number of containers or kilograms
  - (iv) Name, address and telephone number of material producer;
  - (v) The carrier's name, registration number and vehicle registration;
  - (vi) Reason for the rejection of material and action taken.

The details will be recorded on a customer Hazardous Material Form.

- 6.5** The following details will be recorded for every load of material leaving the site:
- (i) The date and time of removal;
  - (ii) The type and quantity of material (in tonnes or cubic metres);
  - (iii) The destination material management site or exempt facility;
  - (iv) The name and registration number of the carrier removing the material (if applicable).
- 6.6 The details will be recorded on a material transfer note and may be entered into a computer system to assist with the production of auditable records of material inputs as required by the Environment Agency.
- 6.7 A summary of material types and quantities deposited at and removed from the site will be forwarded to the Environment Agency at intervals specified in the EP for the site.
- 6.8 Site inspection sheets – The outcome of all inspections of hard standing areas, push walls, drainage channels etc will be recorded on the daily/weekly inspection sheets (including action taken or proposed). These will be maintained in a file or stored in the site office.
- 6.9 A site diary shall be kept secure and shall be available for inspection at the site when required by an authorised officer of the Environment Agency. This shall include a record of the following events:

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- Construction work;
- Maintenance;
- Breakdowns;
- Emergencies;
- Problems with material received and action taken;
- Site inspections and consequent actions out by the operator;
- Technically competent management attendance on site, the date and the time onto site and left site;
- Despatch of records to the agency;
- Severe weather conditions;
- Complaints about site operations and actions taken;
- Environmental problems and remedial actions; and
- Any other issues of note.

6.10 Visitors to the site will sign the visitor's book upon arrival and exit stating the purpose of their visit and the organisation they represent.