Ellington Road AD Facility

784-B042242

Pest Management Plan

Environmental Permit Variation Application

SUEZ Recycling and Recovery UK Ltd

November 2023

Document prepared on behalf of Tetra Tech Limited. Registered in England number: 01959704

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1.0 INTRODUCTION

1.1 REPORT CONTEXT

1.1.1 This Pest Management Plan (PMP) has been prepared by Tetra Tech on behalf of the operator, SUEZ Recycling and Recovery UK Ltd (SUEZ) in connection to their permitted facility at Ellington Road (the site), New Moor, Northumberland, NE63 9XS. The site location and permit boundary are presented on Drawing Number SUEZ/B042242/PER/01.

1.1.2 SUEZ currently hold a bespoke environmental permit (reference EPR/FP3934WZ) at the site which allows the operation of an In-Vessel Composting (IVC) facility and an Open Windrow Composting facility as Schedule 1 activities. It also allows the operation of a wood shredding facility and a street sweeping waste transfer station which are undertaken as waste operations.

1.1.3 SUEZ are now seeking to vary the environmental permit to remove the IVC facility and allow the operation of an Anaerobic Digestion (AD) facility that will process food waste from household waste collections as well as industrial and commercial customers. The proposed AD facility will be undertaken in the same area that was designated for the IVC facility. The process will generate biogas which then ultimately feeds into a biogas upgrading plant to National Gas Grid criteria and injected into the gas grid. The CHP engine will have a capacity more than 1 megawatt thermal (MWth) and less than 50MWth. As such, it's considered that the CHP engine will be subject to the Medium Combustion Plant Directive (MCPD) and therefore will comprise a 1.2 MW MCP with a specified generator (SG).

1.1.4 There are no proposed changes to the Open Windrow Composting, wood shredding and street sweeping transfer station as a result of this application. As such, the risk of pests from these activities is not expected to increase. Subsequently, this PMP is solely based on the proposed AD facility.

1.1.5 This PMP identifies the potential causes and effects of pest and describes the measures that will be in place to prevent the occurrence of pest from the AD facility.

1.1.6 The PMP is to be reviewed regularly by the Site Manager and the Environment and Industrial Risk (EIR) Manager to ensure it reflects the latest guidance, legislation and the site operations. As a minimum the PMP will be reviewed after a change of operations or after an environmental problem/issue and following complaints on site.

1.2 OBJECTIVES OF THE PEST MANAGEMENT PLAN

1.2.1 This PMP is a working document, intended to be used as a reference document for operational staff on a day-to-day basis. SUEZ will implement the plan to ensure that all reasonable measures are taken to control pests, and in the event that an adverse impact is caused, prompt action will be taken to identify the source and apply corrective measures. It provides a schedule of actions that will be taken to minimise pest impact and details site management procedures for the management and monitoring of pests.

1.2.2 The PMP will adopt a Source → Pathway → Receptor model with an emphasis on implementing effective and robust controls for pests at the earliest stages possible (i.e. at source).

1.2.3 This document provides a summary of the physical and management controls that will be employed to minimise pests at the AD facility. It provides a site-specific assessment of the potential sources of pests; and the receptors it is likely to impact. The document also outlines the control measures including monitoring and contingency actions to be deployed at the AD facility in order to prevent or minimise any infestation of pests.

2.0 SITE DESCRIPTION

2.1 SITE LOCATION

2.1.1 The AD facility will be located to the south west of the wider permitted facility at Ellington Road and is centred at approximate National Grid Reference (NGR) NZ 25761 89238.

2.1.2 The wider permitted facility is adjacent to an active landfill site which is operated by SUEZ under a separate environmental permit (reference EPR/DP3238SB) and includes the operation of landfill gas engines.

2.1.3 The surroundings of the site are predominantly agricultural land and the nearest sensitive receptor is a residential property (New Weetslade) which is located approximately 660m south east of the proposed AD facility.

2.2 OVERVIEW OF AD FACILITY

2.2.1 As noted in Section 1.1, SUEZ are seeking to operate an AD facility at the site which will take place in the same location that was originally designated for an IVC facility.

2.2.2 The AD facility would provide the treatment of organic food waste (initially from municipal waste streams only, although this is likely to be expanded to include some commercial food wastes as further facilities are developed). The process will generate biogas which then ultimately feeds into a biogas upgrading plant to National Gas Grid criteria and injected into the gas grid. Alternatively, the biogas may be processed by the CHP engine to generate heat and electricity that would be used by the AD plant.

2.2.3 The waste acceptance limit for the AD facility will be no more than 100,000 tonnes per annum.

2.2.4 It is considered that the AD facility will fall under following Schedule 1 activity of the Environmental Permitting (England and Wales) Regulations 2016 (as amended):-

- Section 5.4 A(1)(b)(i) - Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving biological treatment.

2.2.5 In addition to the above, the AD facility will have the following Directly Associated Activities (DAAs):-

- Storage of waste pending recovery or disposal;
- Physical treatment for the purpose of recovery;
- Heat and electricity power supply (i.e. CHP);
- Emergency flare operation;
- Gas upgrading;
- Raw material storage;
- Gas storage;
- Digestate storage; and

2.3 WASTE TYPES

2.3.1 As mentioned above, the AD facility will solely treat food waste. A complete list of the proposed waste types is provided as Appendix A.

2.4 PROCESS DESCRIPTION

2.4.1 The AD facility can be separated into six general areas: reception, separation, anaerobic digestion, liquor treatment, biogas handling (including electricity generation) and odour control.

Reception

2.4.2 Delivery vehicles would reverse into the reception area via a roller shutter door that is situated on the outside of the building and a speed door that is located inside the building. Once the doors are closed, the driver would deposit the waste into a waste pit that is situated within the reception area. The pit will be designed to push the waste into the pre-treatment area. This will ensure that waste is processed in the order it is received (first-in, first-out) and therefore ensure that the waste is not stored for more than 72 hours which will be the maximum residency time that waste will be stored in the reception area prior to treatment.

Separation

2.4.3 Waste will be fed into a de-packaging plant which is situated within the main AD process building. The plant will be designed to remove unwanted packaging and contamination (e.g. stones, glass, seeds, pips and bones). Any packaging and contaminants recovered from the plant will be discharged into skips/RoRos where they will be transferred to an appropriate permitted facility for further treatment. It's envisaged that up to 20 tonnes of packaging and contaminants will be stored on site prior to transfer and will be stored for no longer than 7 days.

Anaerobic Digestion

2.4.4 The residual organic waste will be pumped into the hydrolysis buffer tank(s) located to the north of the main AD process building. The tank acts as a buffer between the intermittently working reception and processing halls and the continuously operating AD plant, as well as providing residence time for the enzymatic hydrolysis of fats and proteins.

2.4.5 Slurry is then pumped from the hydrolysis buffer tank to the anaerobic digesters. Three 7,800m^3 AD tanks would convert organic material to biogas (methane and carbon dioxide) by the fermentation of organic material in the absence of oxygen. The retention time of the digester is up to 60 days to maximise the biogas production and biogas is collected within the roof space, which is connected to the biogas system.

2.4.6 As part of the process, SUEZ intend to install pasteuriser tanks which may be used to heat the slurry to 70 °C before it is pumped into the aerobics digesters. Alternatively, the pasteuriser tanks may be incorporated at a later stage of the AD process where it will be used to heat the material 'digestate' to 70°C for a minimum 1 hour before being pumped into the post digestion buffer tank.

2.4.7 The material left from the process (digestate) will still be in slurry form and can be used as a fertiliser, compost or soil improver. To achieve this, the digestate will be subject to the specifications outlined in PAS 110 'Specification for whole digestate, separated liquor and separated fibre derived from the anaerobic digestion of source-segregated biodegradable materials.'

2.4.8 At this stage, SUEZ are considering the potential options to process the digestate. The main process is to process the digestate slurry through a centrifuge where solids are dewatered to a dry solid concentration of approximately 25%. The centrifuges will be located within the main AD process building.

2.4.9 Digested material falls by gravity into articulated trailers where it can be periodically collected and subsequently transferred off site. The trailers will have a total storage capacity of 50 tonnes. Under normal

operating conditions, the maximum residence time for the digestate will be no longer than 24 hours before it is transferred off site.

2.4.10 The facility would provide approximately 10,000 tonnes of digested cake per annum which would be spread to agricultural land as a soil enhancer.

2.4.11 In the event that the digestate does not meet the required specifications, the material will be stored within designated RoRos/skips inside the AD building and disposed of accordingly.

Liquor Treatment

2.4.12 Liquor extracted during the dewatering process will be tankered offsite as a liquid fertiliser to reduce the Chemical Oxygen Demand, oxidise ammonia to nitrate and correct pH. Waste sludge from this process will be used to dilute the food waste entering the plant. The remaining liquid is clean enough to either be used for washing down or within the process. Excess liquid will be discharged to sewer.

2.4.13 Finally, SUEZ are considering the potential to utilise the digestate in a slurry form and therefore would not be processed by the centrifuge.

Biogas Handling

2.4.14 The biogas is captured from the AD tanks and is piped into a biogas upgrading plant to National Gas Grid criteria and injected into the gas grid. Alternatively, the biogas may be processed by the CHP engine to generate heat and electricity that would be used by the AD plant.

Odour Control

2.4.15 Processes will be fully enclosed with an odour abatement system comprising the following:

- The first stage of the odour abatement system will consist of a biofilter fit with synthetic medium, this will be followed by reheat to reduce moisture and a second stage carbon filter in tipping hall and pre-treatment area; and
- Biogas scrubber to treat ammonia and hydrogen sulphide (H_2S) in the digestate out area.

2.5 SITE LAYOUT

2.5.1 An indicative site layout plan of the AD facility is provided on Drawing Number 1440_PL100.

2.6 OPERATING HOURS

2.6.1 The facility will operate 24 hours a day, in a similar manner to the current IVC but that vehicle movements to and from the site will be restricted to the following hours (which mirror the current planning permission for the IVC).

- 07:00 – 20:00 – Monday - Friday
- 07:00 – 17:00 – Saturday

2.6.2 There will be no deliveries undertaken on Sundays.

3.0 POTENTIAL SOURCES FOR PESTS

3.1 VERMIN

3.1.1 Vermin (principally rodents) will be attracted by waste streams that contain putrescible materials. Waste that may contain putrescible materials will be stored in the AD building which is equipped with a roller shutter door that is situated on the outside of the building and a speed door that is located inside the building.

3.2 INSECTS

3.2.1 There are around six insect species that have the potential to cause regular and significant problems on and around waste management facilities. Fly larvae occur in damp, decaying organic waste. However, each species will have a preferred niche in terms of temperature, moisture levels and nature of the material. There is an increased chance of fly problems occurring where waste is stored for a prolonged period of time.

3.2.2 The most common species associated with waste management facilities which have the potential to generate complaints are outlined in Table 1.

Table 1: **Main Fly Pest Species**

Fly species	Typical pest status	Notes
Common housefly (Musca domestica)	Can cause widespread and severe problems	Larvae found in poultry, pig, and calf manure, and in refuse. Adult readily disperses and enters buildings.
Lesser housefly (Fannia canicularis)	Can cause widespread and severe problems	Larvae found in poultry manure, and in refuse. Adult readily disperses and enters buildings.
Blow flies: Bluebottles / Greenbottles (Calliphora / Lucilia)	Localised problems	Larvae found in carrion and faecal material, commonly associated with putrescible waste. Adults tend not to disperse far.
Stable flies (Stomoxys calcitrans)	Localised problems only	Larvae found in manure of large animals, e.g. cattle and pigs. Adult is blood-feeding, and tends not to disperse far.
Fruit flies (drosophila spp.)	Localised problems only	A small (2mm) fly. Larvae found in rotting vegetation or vegetable waste, e.g. green-waste composting. Tends not to disperse far.
Cluster flies (Pollenia rudis, Eudasyphora cyanella, Musca autumnalis)	Localised problems only	The larvae of these flies are not found in livestock or waste facilities, but the adults do enter buildings in the autumn, and may be confused with houseflies by complainants.

3.3 BIRDS

3.3.1 Many different bird species may be considered a hazard or annoyance including Corvids, Pigeons, Geese, Starlings and Gulls. Birds are likely to be attracted by putrescible waste stored at a site. The varying species of Gull could often be the primary source of hazard or annoyance at a site. A variety of methods of control are required, especially as gulls are a reasonably intelligent species and will acclimatise to a single control measure used in isolation quite quickly.

3.3.2 There are also seasonal variations that will affect the numbers of birds on site. If the birds are nesting during the spring/summer months and require food for their chicks or if food availability is scarce in winter, this may make the birds more desperate to find food and bring increased numbers.

4.0 RELEASE POINTS, PATHWAYS AND SENSITIVE RECEPTORS

4.1 RELEASE POINTS AND PATHWAYS

4.1.1 Vermin - It is possible that vermin may pass from premises to premises overground or by establishing burrows under the boundary fence. These may be easily identified and blocked.

4.1.2 Insects - Most adult flies stay close to their breeding sites. However, a proportion will disperse away and have the potential to cause a nuisance at receptors. Houseflies are capable of dispersing over distances of several kilometres, although problems seldom occur at distances greater than 2-3 km from the source. Significant problems will generally occur within 500m of the source. Dispersal factors can vary but are mainly influenced by high levels of fly breeding at the source and weather conditions.

4.1.3 Birds - Putrescible waste streams will be stored in the AD building; however birds may hover around the facility and settle on rooftops awaiting an opportunity to set on a food source.

4.2 RECEPTORS IDENTIFICATION

4.2.1 Key potentially sensitive receptors within 1km of the AD facility are identified in Table 2 and are shown on Drawing Number SUEZ/B042242/REC/01.

Table 2: Receptors Within 1Km of the AD Plant

ID	Receptor	Direction from Operational Area	Minimum Distance from the Permit Application Boundary (approx. m)
Domestic Dwellings			
1	Portland Farm Cottage	N	955
2	Northumberland holiday lets cottage farmhouse	N	1,000
3	Residential Properties	SE	860
4	New Weetslade	SE	660
5	Property off A1068	NE	716
6	New Moor Shaft Cottages	NE	710
Commercial and Industrial Premises			
7	Portland Industrial Estate	SE	800
Schools/Hospitals/Shops/Amenities			
8	Bluesky Caravan Park	N	944
Highways or Minor Roads			
9	A1068	E	460
Protected Habitats			
10	Deciduous Woodland (Portland Burn)	N	489
11	Deciduous Woodland	S	885
12	Lowland Meadows	SE	576

Designated ecological habitats e.g. Ramsars, SAC, SPA, SSSI			
13	SSSI – Hawthorne Cottage Pasture	SE	585
Local Wildlife Sites (LWS)			
14	Portland Terrace Copse	S	880
Surface Water e.g. rivers and streams			
15	Portland Burn	E	60
Groundwater (sensitivity)			
According to the Multi-Agency Geographic Information for the Countryside's (MAGIC) website, the site is not situated within a groundwater source protection zone. The MAGIC website indicates that the site overlies a Secondary A aquifer.			

4.2.2 As noted in Table 2, the underlies a Secondary A Aquifer which is not considered to be a receptor that is susceptible to pests. As such, these receptors are not considered further in this PMP.

4.2.3 In addition to the above, Nature and Heritage Conservation Screen (Reference Number EPR/UP3494ZL/V007) was requested from the Environment Agency. This screen determines the presence of any sites of nature and heritage conservation, or protected species or habitats that may be impacted by the proposal. The results of the screen identified the following sites that are located over 1km of the site.

Table 3: Receptors Identified from Nature and Heritage Conservation Screen

Site	Designation	Direction from Operational Area	Minimum Distance from the Permit Application Boundary (approx. m)
Northumbria Coast	Special Protection Area (SPA)	E	5,780
Northumbria Coast	Ramsar	E	5,780
Northumberland Marine	Special Protection Area (SPA)	E	5,780

4.2.4 Although some of these sites may be susceptible to pests, it's considered that the risk from the proposed AD facility is negligible due to the distance of the sites. As such, these receptors are not considered further in this PMP.

4.2.5 The sensitive receptors will be reviewed at least annually and following complaints to site or to the Environment Agency (EA).

5.0 PEST MANAGEMENT CONTROLS

5.1 WASTE ENQUIRIES

5.1.1 Prior to setting up any new contract, the agreed procedures will determine the acceptability of the waste based on the information supplied by the customer. The customer should complete a Waste Enquiry Form and return it to the Site Administrator.

5.1.2 Before the waste arrives at site, a copy of the completed Waste Enquiry Form will be made available to the site so that the Site Manager is aware of and can make provision for any special handling requirements (including pests such as vermin and insects) as detailed in the form.

5.1.3 A contract request form will be completed by the Sales Co-ordinator and forwarded to the relevant Site Administrator so that a contract can be set up before the waste arrives on site. This ensures the weighing exercise will be very quick to reduce the period of time incoming vehicles spend on site before depositing of waste.

5.1.4 The continued acceptability of all waste contracts will be reviewed annually, or in line with changes to legislation.

5.1.5 As the waste received at the site is via a long term contract and similar to other contracts within SUEZ, a high level of operator experience is shared in handling the feedstock.

5.2 WASTE ACCEPTENCE

5.2.1 The site operators will ensure that capacity is available on-site before accepting waste. In particular, if the waste reception pit is full, all inbound loads of waste must be diverted until the quantity of waste on site has been reduced. If loads are turned away, then this will be recorded in the site diary.

5.2.2 Only waste types detailed within the environmental permit will be accepted at the site.

5.2.3 Upon arrival, all documentation accompanying the load shall be checked at the weighbridge, and shall include, but not be limited to the Carriers Certificate of Registration and Duty of Care Waste Transfer Note.

5.2.4 Where practicable, the Weighbridge Clerk will complete a visual inspection of each load. The main inspection will be in the reception area including an assessment of pests. Site staff will visually inspect the waste, as it is unloaded from the vehicles and complete the Waste Acceptance Form.

5.2.5 If vermin or insects such as flies were identified within loads then the site may choose to reject them if it is thought to cause ongoing compliance issues.

5.2.6 If any material delivered to site was thought to have the presence of vermin or insects then this information would be fed back.

5.2.7 In order to reduce impact of insects such as flies during vehicle movements the site staff ensure that all waste vehicles fitted with sheets are sheeted when entering and leaving site.

5.2.8 During collection from the households, the collection crews will be making checks of the material to ensure that only acceptable contracted wastes are collected. Checks for the presence of pests within the waste are also undertaken during collection and appropriate action will be taken if the material is deemed not to be acceptable at the site.

5.2.9 Should it become necessary, the Site Manager will arrange for the pest contractor to visit the site to carry out further control works.

5.3 WASTE STORAGE, BUILDING ENCLOSURE AND ABATEMENT

5.3.1 All wastes accepted for the AD facility will be stored and processed within the confines of a building. This building benefits from a roller shutter door on the outside and a speed door on the inside will be kept closed when not in use (i.e. arrival or departure of vehicles). In addition, pedestrian doors are also closed when not in direct use. In addition, the building would be maintained under negative air pressure through the extraction of air by forced ventilation. This would ensure that all odours are drawn through the odour control system preventing odour release from the building which could subsequently attract pests.

5.3.2 Upon receipt, all wastes will be deposited into the waste reception pit which comprises a walking floor and screw conveyor which will feed the waste that will push the waste into the pre-treatment area. This will ensure that waste is processed in the order it is received (first-in, first-out) and therefore ensure that the waste is not stored for more than 72 hours which will be the maximum residency time that waste will be stored in the reception area prior to treatment.

5.3.3 Although the main AD process will comprise a retention time of 60 days, the process will be undertaken within a sealed network. The retention time has been selected to optimise the extent of biodegradation which will subsequently optimise the production of biogas and potentially increase the quality of the digestate with low odourous compounds. This will subsequently minimise the risk of pests from digestate.

5.3.4 The AD process will generate a digestate which may be sent out as a slurry as a biofertilser or processed by a centrifuge to separate the solid and liquid fractions. The digestate 'cake' which will be discharged into articulated trailers where it can be periodically collected and subsequently transferred off site. The trailers will be situated within a designated area inside the AD building and is connected to the odour control system for direct air extraction. This would ensure that all odours are drawn through the odour control system preventing odour release from the building which could subsequently attract pests. Details regarding the odour control system are provided in the Odour Management Plan (Appendix G of the Environmental Permit Application).

5.3.5 Any liquor extracted from the centrifuge would be treated and subsequently stored in tankers prior to reuse in the dissolver, discharged to sewer or applied to land as a soil enhancer.

5.3.6 The available storage capacity of the AD facility will be influenced by the period of time the waste is in the treatment vessels (for up to 60 days). Waste will only be accepted if there is sufficient capacity. All waste entering the site will be logged at the weighbridge including weight, EWC codes, date and time. The Site Manager will be able to review this information via weighbridge reports to understand the available storage capacity.

5.3.7 In addition, the AD plant will benefit from a process monitoring control system which will monitor the operational parameters of the plant including the available storage capacity of the vessels. This system will be used to facilitate effective stock management and minimise the risk of vessels overfilling.

5.3.8 Deliveries will be planned in advance with the delivery date agreed by SUEZ and the waste producer/holder. This will ensure that waste is accepted at manageable volumes.

5.3.9 All voids are sealed within the AD building to reduce the opportunity for nesting vermin such as rats/mice. The general design of the internal areas has been considered so as to reduce the amount of inaccessible areas for cleaning, the bays will be sealed to prevent waste accumulation behind them.

5.4 LITTER

5.4.1 The control of litter is also important to reduce the potential for insects, pests and vermin. All vehicles delivering and removing waste at the site, will be required to be sheeted or enclosed. The site entrance,

gates and perimeter fences will be inspected daily, by a member of staff for windblown litter. Where litter is blown outside of the boundary, it will be collected as soon as possible.

5.5 HOUSEKEEPING

5.5.1 The site will be subjected to a good housekeeping regime which assists with the aim of proactive management and associated environmental compliance. Daily inspections will be undertaken at the site via the Daily/Weekly Checklist (Appendix B). The checklist will be completed by the Site Manager or designated staff and signed off at least weekly by the Technical Competent Manager (TCM) for the site. All employees will be required to report any vermin/pest issues around the plant, AD building or vehicles immediately to the Site Manager. Any incidents will be recorded in the Site Diary and remedial action instigated as quickly as possible.

5.5.2 Regular cleaning will be undertaken in the waste storage areas, including floors and bays to ensure the removal of any residues or debris to reduce the potential of pests.

5.5.3 In addition to operating a first in and first out policy, the waste reception pit and digestate storage bay will be regularly emptied to allow it to be cleaned thoroughly.

5.6 STAFF TRAINING

5.6.1 Staff training will be a key aspect of ensuring that pest can be controlled through effective management during daily operations. All site operatives will therefore be trained via toolbox talks to deal with pest management issues. Annual refresher toolbox talks will ensure that the requirements of the PMP are reinforced

5.7 VEGETATION

5.7.1 Vegetation is kept in control around the facility and all grassed areas regularly reviewed and cut when appropriate to reduce the likelihood of vermin nesting.

5.8 DRAINAGE

5.8.1 Drainage is regularly inspected and cleared as and when required to prevent the potential for standing water which may attract vermin.

5.9 SPECIFIC BIRD CONTROL MEASURES

5.9.1 Specific bird control measures will be deployed by specialised designated contractor when deemed necessary.

5.10 SPECIFIC VERMIN CONTROL MEASURES

5.10.1 In addition to the regular monitoring and checks carried out by site staff, approved pest control contractors are engaged to visit site on a monthly frequency as a minimum. The works undertaken by the contractor may include those detailed below;

- Baiting inside and outside the AD building as well as on the neighbouring administration buildings
- Collection and disposal of dead vermin
- Written reports provided and filed at site after each visit to site detailing findings and any actions undertaken and/ or recommendations for improvement.

5.11 SPECIFIC FLY CONTROL MEASURES

5.11.1 Effective fly management can be achieved through rigorous turn-around of waste during the waste reception stage and frequent cleaning.

5.11.2 The Site Manager will record fly activity within the site diary where identified.

5.11.3 The EA guidance outlines fly management techniques, with particular attention brought to the use of non-chemical techniques as a first priority where appropriate. This is also imposed in the COSHH Regulations 2012, where the use of non-hazardous pest control techniques is identified as being favoured over those which could potentially be harmful, such as pesticides.

5.11.4 Flies are controlled as and when required by an approved Pest Controller using non-chemical techniques where possible. In circumstances where this is not possible then suitable chemical spray (insecticide space spray or surface spray) to treat waste storage areas is completed.

5.11.5 Where additional control is required, in line with the IMS the pest control contractor will be required to use electrical fly control methods or spray the waste / building, as necessary.

5.11.6 The proposed control mechanisms will be reviewed on an annual basis to assess their effectiveness. Any significant changes will be communicated to the EA as required.

6.0 MONITORING SITE CHECKS

6.1 OVERVIEW

6.1.1 Regular monitoring is carried out to assess the following: -

- Confirmation that any vermin, birds and insects are under control; and
- Assessment to confirm compliance with the environmental permit

6.1.2 The presence of pests is regularly assessed by site staff and any issues related to vermin, birds or insects identified reported to site management for investigation.

6.2 DAILY/WEEKLY CHECKS

6.2.1 Daily inspections are carried out by Site Management and recorded on the daily/ Weekly IMS checklist (Appendix B). The daily inspections include checks for the following.

- Pests
- Vegetation
- Drainage
- Infrastructure
- Litter

6.2.2 Any issues or non-conformances identified will be clearly marked on the inspection form.

6.2.3 Should a pest nuisance be identified during a routine assessment then an investigation on the source of the nuisance will be undertaken.

6.2.4 Should the pest nuisance be attributed to the site, then the site manager will be informed immediately, and remedial measures will be taken. Remedial actions may include but be not limited to: -

- Checking storage areas to identify the source of the nuisance to a particular waste;
- Removal of the waste causing the nuisance at the earliest opportunity and within 24 hours;
- Cleaning of storage area/s;
- Using either non-chemical techniques or suitable chemical spray (insecticide space spray or surface; spray) to treat waste storage areas; and
- Arrival of pest control contractor on site.

7.0 SPECIALIST CONTRACTOR

7.1 ROUTINE INSPECTIONS

7.1.1 In addition to the regular monitoring and checks carried out by site staff, approved pest control contractors are engaged to visit site on a monthly frequency as a minimum. The works undertaken by the contractor are detailed in Section 5.0.

7.2 MANAGEMENT OF CONTRACTORS

7.2.1 All records of inspections and controls by Specialist Contractors are retained on file on site.

7.2.2 Regular review meetings will be held with the Specialist Contractors.

7.2.3 Site Management will ensure that Specialist Contractors complete site visits in line with the agreed frequency. Where inspections are not completed a review of the performance of the contractor should be completed by Site Management who will take appropriate action.

8.0 COMPLAINTS & ENGAGEMENT

8.1 INVESTIGATIONS AND RECORDS

8.1.1 Any complaints received at the facility or via the regulatory bodies including the EA and Local Authority, will be recorded and SUEZ will investigate further. Where possible, as much information and detail about the complaint will be recorded, whether this is from the relevant authority or complaint direct to site. This information will assist in the investigation and determining the source of the pest nuisance.

8.1.2 All complaints and queries will be logged in accordance with the integrated management system as soon as in practicably possible. All complaints logged will be subject to investigation and complainants responded to within 48 hours of receipt. All responses will be through trained and experienced staff.

8.1.3 Complaints investigations are carried out by site management.

8.1.4 Should the complaint be received out of operational hours then Site Management shall try to attend site as soon as possible to carry out an investigation dependent upon availability.

8.1.5 SUEZ 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 EA. SUEZ will be in regular contact with the complainant and the Agency whilst the cause of the pest nuisance is being investigated and remediated.

8.1.6 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.

8.2 NON-CONFORMANCES AND COMPLAINTS

8.2.1 Corrective action procedures are documented in Section 2.13 of the IMS – Non-conformance, Corrective and Preventive Actions. A list of all policies and procedures is included in the Site Management Plan, which forms part of the Environmental Permit.

8.2.2 Each complaint will be reviewed and assessed. If the site is identified as the source of potential nuisance then an assessment will be carried out in order to determine the source of the complaint and the cause of the pest nuisance.

8.2.3 If a nuisance can be directly related to the site, corrective actions will be identified and programmed for remediation. Actions taken in response to any pest complaint will be recorded either on the IMS daily checklist or in the site diary.

8.2.4 If remediation cannot be completed within 24 hours then the non-conformance and remedial actions shall be raised on the SUEZ Compliance and Audit System (COMPAS).

8.3 COMPLAINTS AND MANAGEMENT REVIEW

8.3.1 All complaints will be reviewed regularly by the Site Management and EIR Manager including but not limited to a review of the number of complaints, investigations and remediation works. If required, the Site Management Plan and PMP shall be updated to reflect any changes made to the management procedures on Site following the review.

8.3.2 Site Management and the EIR Manager review all procedures for the facility against other SUEZ operations and management procedures as well as industry practice, guidance and legislation to ensure continued best practice is carried out at the facility. Any amendments to practices on Site will be reflected in updates of the Operating Techniques and PMP.

8.3.3 All pest complaints are reported within the EIR Department via the EIR Manager, and where applicable, communicated to relevant parties within SUEZ as part of the EIR Department monthly review.

8.4 COMMUNITY ENGAGEMENT

8.4.1 Should pest nuisance be identified from external sources which are thought may have been related to complaints received or likely to cause complaints, then the site would consider contacting those responsible for the nuisance, if possible, to establish communication in relation to those activities.

DRAWINGS

Site Location - SUEZ/B042242/PER/01

Receptor Plan - SUEZ/B042242/REC/01

Proposed Site Layout – 1440_PL100

APPENDICIES

APPENDIX A – WASTE TYPES

Table A1: Waste Types for Anaerobic Digestion Plant

Waste Code	Description
02	**Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing, food preparation and processing.**
02 01	**Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing**
02 01 01	Sludges from washing and cleaning – vegetables, fruit and other crops
02 01 02	Animal tissue waste
02 01 03	Plant tissue waste
02 01 06	Animal faeces, urine and manure (including spoiled straw) only
02 01 07	Wastes from forestry
02 01 99	Wastes not otherwise specified – spent mushroom compost from commercial mushroom growing only
02 02	**Wastes from the preparation and processing of meat, fish and other foods of animal origin**
02 02 01	Sludges from washing and cleaning
02 02 02	Animal tissue waste
02 02 03	Materials unsuitable for consumption or processing
02 02 04	Sludges from on-site effluent treatment
02 02 99	Sludges from gelatine production and animal gut contents only
02 03	**Wastes from fruit, vegetables, cereals, edible oils, cocoa, coffee, tea and tobacco preparation and processing; conserve production; yeast and yeast extract production, molasses preparation and fermentation**
02 03 01	Sludges from washing, cleaning peeling, centrifuging and separation (including sludge from production of edible fats and oils, seasoning residues, molasses residues, residues from production of potato, corn or rice starch only)
02 03 04	Materials unsuitable for consumption or processing
02 03 05	Sludges from on-site effluent treatment
02 04	**Wastes from sugar processing**
02 04 01	Soils from washing and cleaning beet
02 04 03	Sludges from on-site effluent treatment
02 04 99	Other biodegradable wastes, allowed only if no chemical agents added and no toxin residues
02 05	**Wastes from the dairy products industry**
02 05 01	Wastes from the dairy products industry
02 05 02	Sludges from on-site effluent treatment
02 06	**Wastes from the baking and confectionery industry**
02 06 01	Materials unsuitable for consumption or processing
02 06 03	Sludges from on-site effluent treatment

02 07	**Wastes from the production of alcoholic and non-alcoholic beverages (except coffee, tea and cocoa)**
02 07 01	Wastes from washing, cleaning and mechanical reduction of raw materials
02 07 02	Wastes from spirits distillation
02 07 04	Materials unsuitable for consumption or processing
02 07 05	Sludges from on-site effluent treatment – sludges from the production of alcoholic and non-alcoholic beverages (except coffee, tea and cocoa)
02 07 99	• Malt husks, malt sprouts, malt dust • Spent and sludge from breweries • Sludge from wine making Waste types in this section allowed if biodegradable material only, no chemical agents added
04	**WASTES FROM THE LEATHER, FUR AND TEXTILE INDUSTRIES**
04 02	**Waste from the textile industry**
04 02 10	Organic matter from natural products such as grease and wax
07	**WASTE FROM ORGANIC CHEMICAL PROCESSES**
07 01	**Wastes from the manufacture, formulation, supply and use of basic organic chemicals**
07 01 08	Glycerol waste from bio-diesel manufacture from non-waste vegetable oils
15	**WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED**
15 01	**Waste packaging, absorbents, filter materials, wiping cloths and protective clothing**
15 01 01	Paper and cardboard packaging (excluding veneers, plastic coatings or laminates) certified to EN 13432 or equivalent certified compostable standard
15 01 02	Plastic packaging – compostable plastics only certified to EN 13432 or equivalent certified compostable or digestible standard
15 01 03	Wooden packaging – virgin timber only
15 01 05	Composite packaging meeting EN 13432 or equivalent certified compostable or digestible standard
15 02	**Absorbents, filter materials, wiping cloths and protective clothing**
15 02 03	Absorbents, filter materials and cloths from the production of alcoholic and non-alcoholic beverages other than those mentioned in 15 02 02 made from compostable material only
16	**WASTES NOT OTHERWISE SPECIFIED IN THE LIST**
16 10	**Aqueous liquid waste destined for off-site treatment**
16 10 02	Untreated wash waters from cleaning fruit and vegetables on farm only
16 10 02	Milk and dairy waste milk from agricultural premises only
16 10 02	Liquor or leachate from a composting process that accepts waste input types listed in these standard rules or composting and anaerobic digestion standard rules only and in compliance with Animal By Products Regulations
19	**Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use**

19 02	**Wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation**
19 02 03	Premixed wastes composed from waste listed within these standard rules only
19 02 06	Sludge types from waste listed within this table that have been heat treated only
19 02 06	Sludges from physico/chemical treatment other than those mentioned in 19 02 05 (sewage sludge which has been previously pasteurised and stabilised only)
19 02 10	Glycerol not designated as hazardous – excludes 19 02 08
19 05	**Wastes from anaerobic treatment of solid wastes**
19 05 99	Waste types in this section are allowed only if derived from input types allowed by the Anaerobic Digestate Quality Protocol
19 06	**Wastes from anaerobic treatment of waste**
19 06 03	Liquor from anaerobic treatment of municipal waste (from a process that treats wastes which are listed in this table only)
19 06 04	Digestate from anaerobic treatment of source segregated biodegradable waste (from a process that treats wastes which are listed in this table only)
19 06 05	Liquor from anaerobic treatment of animal and vegetable waste (from a process that treats wastes which are listed in this table only)
19 06 06	Digestate from anaerobic treatment of animal and vegetable waste (from a process that treats wastes which are listed in this table only)
19 08	**Wastes from wastewater treatment works**
19 08 09	Grease and oil mixture from oil and water separation containing only edible oils and fats
19 08 12	Sludges from biological treatment of industrial waste water (from a process that treats wastes which are listed in these standard rules only)
19 12	**Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified**
19 12 12	Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11
20	**Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions**
20 01	**separately collected fractions (except 15 01)**
20 01 01	Paper and cardboard (excluding veneers, plastic coatings or laminates) meeting EN 13432 or equivalent certified compostable or digestible packaging only
20 01 08	Biodegradable kitchen and canteen waste
20 01 25	Edible oil and fat
20 02	**Garden and park wastes (including cemetery waste)**
20 02 01	Biodegradable waste
20 03	**Other municipal wastes**
20 03 01	Mixed municipal waste
20 03 02	Waste from markets

APPENDIX B - DAILY/WEEKLY SITE INSPECTION CHECKLIST