



ENVIRONMENTAL SERVICES LTD

Operating Techniques

Alcan Recovery Permit

Sanders Plant & Waste Management Ltd



Basis of Report

This report has been prepared by Probe Environmental Services Ltd with all reasonable skill, care and diligence. Information reported herein is based on the interpretation of data collected and has been accepted in good faith as being accurate and valid.

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Drawing 001	Site Location Plan
Drawing 002	Proposed Permit Boundary
Drawing 003	Historic Site Layout Plan
Drawing 004	Site Receptor Map
Drawing 005	Recovery plan Initial fill area cross section
Drawing 006	Recovery plan Initial fill area
Drawing 007	Recovery plan model

1.0 Introduction

Sanders Plant and Waste Management Ltd (Sanders) has instructed Probe Environmental Services Ltd to prepare an Operating Techniques Document to form part of the Environmental Management System (EMS) under which the site will operate.

The site location is detailed on Drawing 001. Drawing 002 illustrates the permit boundary. Drawing 003 shows the Site Layout.

The operator wishes to apply for a Bespoke Deposit for Recovery Permit to allow the site to carry out land remediation and creation of a development platform. The total quantity of waste that can be stored and subsequently treated at the site shall be no more than 270,000 tonnes per year.

Wastes accepted on-site under the proposed new deposit of waste for recovery permit would be accepted on site for the for the purposes of deposit to reinstate the site.

1.1 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

¹ Risk assessments for your environmental permit (8 May 2018)

2.0 Management

2.1 Management System

Sanders 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.

2.1.1 Management Structure and Responsibilities

The Site Manager 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.

As detailed in Section 2.1 of the EMS

2.1.2 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. Mr Lee Coulson has registered to be the qualified technically competent manager for the site. (WAMITAB documents are available in section 8 of the application).

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 SOP3.15 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.

2.1.3 Site Security

In order to prevent unauthorised access, a number of site security measures will be in place at the site including (As detailed in Section 3.7 of the EMS);

- out of hours security patrols & 24 Hr CCTV Monitoring;
- gates which will be locked when the site is not in use; and
- fencing or barriers to entry along the entire site boundary.

The buildings 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.

2.1.4 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 impermeable surfacing;
- maintenance of drains and sumps; and
- actions taken to clean up incidents and spillages.

2.1.5 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.

2.1.6 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.

2.1.7 Reporting Non-Compliance and Taking Corrective Action

Procedures 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 (As detailed in Section 3.3 of the EMS):

- 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).

2.1.8 Auditing and Legal Compliance

There will be a formalised internal 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 on Form 4.3 of the EMS.

2.1.9 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 within the EMS.

2.1.10 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 detailed within Section 3.9 of the EMS.

2.1.11 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.

2.2 Accident Management Plan

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

An accident management plan will be implemented and maintained at the 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 SOP3.16 of the EMS.

2.2.1 Hazard Identification

The following accident hazards have been identified;

- Unauthorised Waste Acceptance;
- Flooding;
- Unauthorised Access Resulting in Bodily Harm;
- Arson and/or Vandalism;
- Accidental Fire; and
- Spillage of Liquids.

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

2.2.2 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 building prior to export from site to a suitably permitted facility for recovery or disposal.

The waste acceptance procedures are included in SOP3.2 of the EMS.

2.2.3 Fire Management Plan

The risk of accidental combustion of the waste types accepted at the site is extremely unlikely and as such no FPP is required. Notwithstanding this, to prevent and minimise the potential impact of fire,

the site has a site specific fire prevention objectives. A brief summary of the measures which will be employed is as follows:

- No flammable wastes are to be accepted
- 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 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 buildings will be evacuated.

2.2.4 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 (As detailed in Section 3.18 of the EMS):

- *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.
- *Storage vessels:* storage tanks will be constructed to the appropriate British Standard;
- *Inspection:* 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

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 SOP3.17 of the EMS, details further information in regards to spillages on site.

2.2.5 Security and Vandalism

The following security measures are in place (As detailed in Section 3.7 of the EMS);

- *Site perimeter*: the site benefits from fencing around the perimeter;
- *Security gates*: will be locked at all times when the facility is unattended, and the site gate will be locked when the site is not in use at the entrance of the site;
- *24 hour Security guard is employed on site who patrol with guard dogs at regular frequencies*
- *CCTV*: static cameras and mobile cameras are situated in various areas of the site. These cameras can be viewed during the day in the site office and remotely on mobile devices. Out of hours the cameras are monitored by an external company and mobile access is available to key holders.
- *Inspection*: gates and fencing 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.

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.

2.2.6 Flooding

There are no surface water features within the site boundary.

Using the Environment Agency Long Term Flood Risk Information service the site is identified as having a 'very low risk' of flooding from surface water, reservoirs, rivers and seas.

3.0 Operations

3.1 Process Description

Waste operations at the site will allow the operator to operate a Deposit for Recovery.

These rules will permit the reception compacting, and deposit for recovery of inert materials. The area will be filled with 200,000 m³ see Drawing 005 & 006.

Wastes are primarily accepted by Sanders Plant & Waste Management Ltd.

All deliveries to the site will report to the site's weighbridge. The weighbridge operator will request and check the waste transfer note/customer details and carry out randomised checks on the waste carriers registration if applicable.

The weighbridge operator will visually inspect the waste. Incoming waste loads that are found to contain non-permitted wastes will be rejected. The weighbridge operator will advise the carrier of the reasons for the rejection, and will record the details of the load and the reason for rejection in the site diary/ Section 4 of this report. Waste Delivery/Acceptance/Rejection note.

Once the weighbridge operator is satisfied that the documentation has been processed correctly and the waste can be accepted at the site, the vehicle will be weighed, the information recorded and the driver will be instructed to proceed into the site.

The driver will be directed to the site's designated area for deliveries and will be asked to eject the load for further inspection and sorting or, if suitable, eject the load directly into the stockpile bays for onwards recycling. Waste will not be mixed with any other waste until the site supervisor confirms that the material can be accepted.

If any non-permitted wastes are identified following a delivery at the site, they will be taken to the site's designated quarantine area. The details will be recorded in the site diary and arrangements will be made to remove the offending item to a suitable licensed facility as soon as practicable possible.

Once the materials have undergone treatment and are ready for off-site processing, they will be stockpiled within designated areas or placed within sealed containers awaiting transfer off-site.

The site EMS summary provides further information of operations and procedures on site.

3.2 Permitted Activities

The waste management carried out are described and limited to those within the site permit for a deposit for recovery facility.

These rules will permit the acceptance for deposit for recovery or inert wastes for the activities are specified in Annex I and Annex II of the Waste Framework Directive 2008 as follows:

Description of activities Limits of activities

R3: Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes)

R5: Recycling or reclamation of other inorganic materials

R13: Storage of wastes pending any of the operations numbered R5 and R10

R10: Land treatment resulting in benefit to agriculture or ecological improvement

reclamation or improvement of land as detailed in the approved waste recovery plan.

In any event the total quantity of waste used shall not exceed the amount needed to complete the recovery operation to the final levels in the approved waste recovery plan.

Only the waste types specified in the approved waste recovery plan shall be accepted. Such wastes shall only be used as specified in the approved waste recovery plan.

Restoration, reclamation and land improvement activities must only be carried out on land that has been previously subject to industrial or other manmade development.

No waste shall be deposited into a water body or subwater table.

Storage of waste prior to use in the recovery activity shall be limited to 12 months.

3.2.1 Permitted Types and Quantities of Waste

It is proposed the site will accept and process 260,600 tpa of wastes at the proposed permitted activity.

3.3 Waste Acceptance

3.3.1 Hours of Operation

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

3.3.2 Load Inspection and Waste Control

All vehicles bringing waste material to the site will report to the weighbridge 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.

Waste Acceptance Procedures are detailed in the Management System SOP/3.2 Waste Acceptance Procedures

3.3.3 Means of Measurement

The quantity of waste accepted and despatched from the facility will be measured via the onsite weighbridges the weighbridge or calculated by recording the volume of waste entering the site and the application of standard Environment Agency conversion factors as appropriate.

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. Management System SOP/3.5 details the weighbridge operations.

3.4 Waste Storage

Maximum waste storage on site at any one time will be as follows:

200 Tonnes of inert materials.

3.5 EWC Waste Codes to be accepted on site

The Waste Recovery plan lists the proposed permitted wastes.

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

The following items of plant and equipment is used on site.

This is not a fixed list of plant and may be subject to change dependent upon the waste stream;

- Screener
- 360° excavator
- Loading Shovel

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 be operated to prevent fugitive emissions to surface water and groundwater.

4.1.1 Engineered Containment

All waste will be stored and treated on an impermeable surface with the building having sealed construction joints and bunds to prevent any water or oils/fluids leaving the building.

4.1.2 Containment Bunding

All potentially polluting materials for example oils or lead acid batteries 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.

4.2 Sewer

There is a sewer on site for foul water facilities. Surface water management is in accordance with the site surface water management plan (Atkins).

4.3 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.

4.4 Dust

No waste consisting solely or mainly of dusts, powders or loose fibres will be accepted at the site. Subsoils and clays will be deposited on site and compacted in accordance with the CQA plan. Due to the strict control of the waste that will be accepted at the site, dust is not expected to pose a significant risk.

Wastes which have the potential to generate dust during storage will be monitored and mitigation methods such as dampening will be employed to reduce the risk of fugitive dust emissions.

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 SOP3.14 of the EMS.

4.5 Noise

Waste treatment 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 SOP3.20 of the EMS.

The management of noise emissions is detailed in SOP3.10 of the EMS.

4.6 Pests

Due to the nature of the wastes accepted and stored at the site, it is not anticipated that pests will pose a risk at the facility. No food waste is accepted by the site.

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.

4.7 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 SOP3.13 of the EMS.

4.8 Mud and Debris

The site itself is surfaced with concrete 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 and debris; road sweeper will be utilised if required on site to maintain roads
- 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 6 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.

5.1 Reporting and Notifications

5.1.1 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.

5.1.2 Waste Types and Quantities

A summary report of waste types and quantities accepted and removed from the site for each quarter, will be submitted to the Environment Agency within 1 month of the end of the quarter unless otherwise required by the permit conditions.

5.1.3 Relevant Convictions

The Environment Agency will be notified of the following events:

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

5.1.4 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.

5.1.5 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.

6.0 Closure

This report has been prepared by Probe Environmental Services 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.

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