Management Plan

Davis Commercial Services

wiser environment

Helping clients prosper through compliance

SITE DETAILS

Davis Commercial Services Ltd

Baron Avenue

Earls Barton

Northampton

NN6 0JE

OPERATOR DETAILS

Davis Commercial Services Ltd

Baron Avenue

Earls Barton

Northampton

NN6 0JE

PERMIT REFERENCE

EA/EPR/EB3100HN/V002

DOCUMENT REFERENCE

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Wiser Environment Ltd, Suite 11 Manor Mews, Bridge Street, St Ives, PE27 5UW
94 Xuan Thuy, Thao Dien Ward, District 2, Ho Chi Minh City, 713385
+44 1480 462 232 | www.wiserenvironment.co.uk | info@wisergroup.co.uk

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K256.1~20~028	Site Layout Plans	07/12/2023

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K256.1~20~029	Site Layout Plan Process Building and front yard	07/12/2023
K256.1~20~025	A1 Site Layout Plan	07/12/2023
K256.1~20~026	Site layout Plan Storage	07/12/2023
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1 INTRODUCTION

This document is the Management Plan (MP), as required by application form Part C2, Section 3d Management Systems, and the associated Environment Agency guidance[1]. The MP accompanies the application for variation of the Bespoke Installation Environmental Permit EPR/EB3100HN/V002.

The application has been prepared by Wiser Environment Limited on behalf of the applicant Davis Commercial Services Ltd (DCS).

Recent expansion of the business requires the process to be modernised in order to continue to meet the environmental standards and the technical guidance, as well as increase the process efficiency, which allows to recover more value from the waste and improve the environmental benefit of the process.

To accommodate the new process a building has been added to the permitted area located at the back (southwest) of the existing main building. The proximity of the new building allows for efficient movement of the waste streams between working areas, with minimal impact on surrounding environment.

DCS receive WEEE comprising of mainly commercial end of life (EoL) refrigeration units, and commercial catering equipment, as well as separated waste stream from the construction and demolition industry, i.e. metals and insulation panels.

The EoL refrigeration units treated at the facility do not contain Ozone Depleting Substances (***non-ODS***) as refrigerant or blowing agent in the insulating panels.

Of the commercial units received these can be further divided into two distinct types: either a ‘remote’ or ‘integral’: an explanation of the difference between the two types is provided in the table below.

EoL unit type	Key features
Integral	Units which contain compressors with oils and refrigerants and are designed to independently cool within the cabinet shell.
Remote	Units which do not contain compressors with oils and refrigerants.

[1] Develop a management system: environmental permits - GOV.UK (www.gov.uk), updated 3 April 2023

EoL unit type	Key features
	The cabinet or shell in which products are placed are the only components received on site. Oils and refrigerants are held in centralized systems within the retail units, providing refrigeration for several cabinets. These are disconnected at the retailer. Therefore, remote units don't contain refrigerant gas when delivered.

DCS currently operates under a Bespoke Installation Environmental Permit EPR/EB3100HN/V002, and electronic equipment approved authorised treatment facility (AATF) excluding ozone-depleting substances.

Principal activities include treatment of refrigeration units by way of;

- Inspection
- Sorting – units by type, (Integral and Remote)
- Removal of oil from compressors (Integral units only)
- Refrigerant de-gassing (Integral units only)
- Manual dismantling
- Automated treatment comprising of:
    - Crushing / shredding of Eol fridge carcasses
    - Density separation
    - Size reduction - Granulation and pelletisation of the degassed polyurethane foam
- Granulation

All waste treatment activities occur within buildings and are carried out on an impermeable surface with sealed drainage.

The site's main buildings are located in an established Industrial Estate, to the north-east of Earls Barton, approximately 5 km south-west of Wellingborough town centre and 11 km east north-east of Northampton city centre.

The site in centred at National Grid Reference (NGR) 485514, 264571 (SP 85514 64571). The northern site boundary is approximately 320 m south of the A4500, Main Road.

The site also includes a storage area located approximately 50 m west of the main building, centred at National Grid Reference (NGR) 485364, 264601 (SP 85364 64601).

The new building (A1 building) is located adjacent to the southwest corner of the main building, centred at National Grid Reference (NGR) 485483, 264523 (SP 85483 64523).

A map showing the site location and Permit Boundaries is provided in drawing K256.1~20~030 Permit Boundary Plan.

1.1 Permit Variation

The permit variation application proposes the following:

1. Addition of a building, known as the A1 building, to the Permitted area to carry out manual dismantling and 'preparation for re-use' processes.

2. Addition of a point source emission to air

   These need to be added to the permitted area to accommodate the new modernised abatement process, which has been implemented in order to continue to meet the environmental standards and the technical guidance, as well as increase the process efficiency.

   The proximity of the new building allows for efficient movement of the waste streams between working areas, with minimal impact on surrounding environment.

3. Addition of the following activities to the permit:
   - Shredding/fragmenting
   - Density separation
   - Pelletising
   - Granulation

   These activity descriptions are introduced to align their description to the treatment process carried out at DCS.

4. Additional EWC codes:
   - 17 04 01 copper, bronze, brass
   - 17 04 02 aluminium
   - 17 04 03 lead
   - 17 04 04 zinc
   - 17 04 05 iron and steel
   - 17 04 06 tin

- 17 04 07 mixed metals
- 17 04 10*cables containing oil, coal tar and other hazardous substances
- 17 04 11 cables other than those mentioned in 17 04 10
- 17 06 03* other [non ACM] insulation materials consisting of or containing hazardous substances
- 17 06 04 insulation materials other than those mentioned in 17 06 01 and 17 06 03

The treatment process developed at DCS is suited to process these types of wastes, as mixed non-ferrous and ferrous metals as well as insulation panels are routinely processed as part of the EoL fridge units' treatment at the facility. The proposed additional EWC codes would not introduce any additional environmental risk.

5. Increase the storage capacity of WEEE to a maximum of 10,000 tonnes at any one time.

6. Increase the annual throughput to 40,000 tonnes.
   The proposed increase in storage and throughput is to reflect expansion of the business, increase in process efficiency and to future proof the business and make sure that environmental standards continue to be met.

   The increased storage and throughput are comparable to quantities allowed in Standard Rules permits for WEEE ATFs. Therefore, DCS's processes and infrastructure are suited to accommodate the increase without introducing any additional environmental risk.

7. Introduce preparation for re-use as a directly associated activity. This is to make sure that materials are managed according to the waste hierarchy.

1.2 Process Description

Davis Commercial Services Ltd undertake waste activities including storage and dismantling of WEEE.

The site includes three areas:

- The main building accessed off Baron Avenue

- A second building where the main dismantling (stage 2 preparation) process is carried out. This is known as the A1 building.
- The storage yard

These are represented in drawing K256.1~20~028 Site Layout Plans.

1.2.1 Main Process Building

The Main process building includes the following features (see K256.1~20~029 Site Layout Plan Process Building and front yard):

- Office and welfare facilities
- Temporary storage area for integral units to be de-gassed and de-oiled
- Integral units de-gassing and de-oiling area
- Small integral units dismantling area
- Temporary storage area for dismantled units prior to treatment
- Treatment system comprising of size reduction (shredding/crushing/fragmentation), density separation, further size reduction of the foam (granulation) and compaction/pelletisation of the foam.

The yard in front of the main building (accessed via Baron Avenue) includes the following features:

- Non-ferrous and ferrous metals storage area
- Weighbridge
- Quarantine area
- Surface water drainage system

1.2.2 A1 building

The process area in the A1 building and immediate outside include the following (see K256.1~20~025 A1 Site Layout Plan):

- Unloading area
- Office and welfare facilities

- Temporary storage area for units to be processed
- Dismantling area
- Testing and re-use area
- Electric forklift trucks charging area

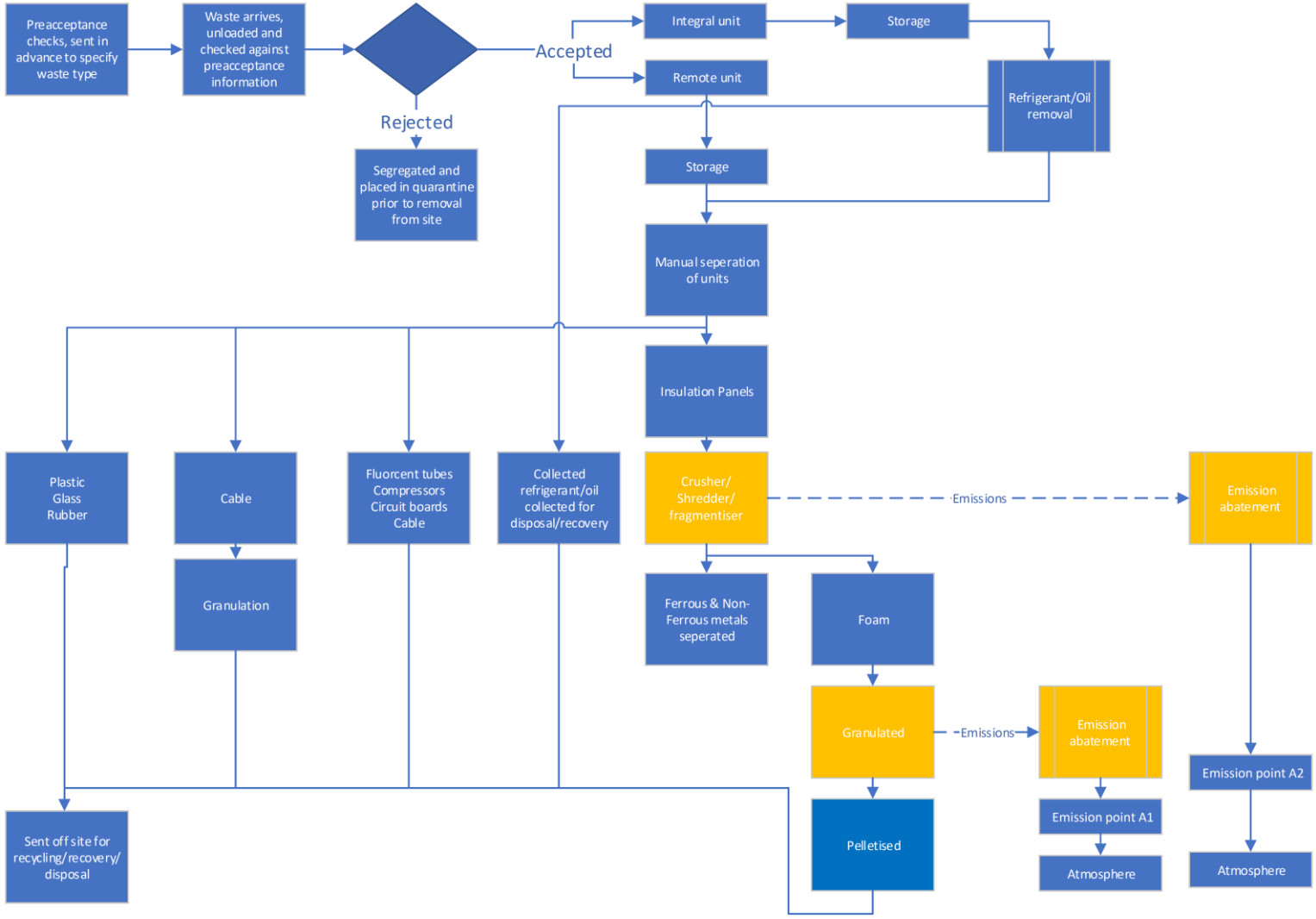
1.2.3 Main storage area

The receipt and main storage areas are illustrated on plan K256.1~20~026 Site layout Plan Rear Yard. This identifies the following key features.

- Access arrangements
- Security – fencing & CCTV
- Receipt, inspection and operational storage area
- Quarantine area
- Site drainage arrangements
- Spill kits
- Fire extinguisher
- Area of impermeable surface.

An overview of the process is shown in the Process Flow Diagram DCS-DRW-01, which is also shown in Figure 1.

Figure 1. Process Flow Diagram



Waste will be delivered to site via the entrance to the main storage area (accessed off Mallard Close) where the EoL units undergo acceptance checks and inspections prior to being assigned a unique ID and being stored, awaiting depolluting (de-oiling and degassing, where necessary for integral units only) and dismantling.

Occasionally, loads that contain exclusively integral units may be unloaded in the yard in front of the main building (off Baron Avenue) and stored directly in the main building.

The storage area includes the following features:

- Weighbridge
- Quarantine area
- A polytunnel for weatherproof storage of units, if necessary i.e. where units have the potential for re-use.
- Impermeable surface with sealed drainage and interceptor

Following acceptance checks the remote units are transported to the manual dismantling area in building A1. All units are brought into the building (‘READY TO PROCESS STOCK AREA’ K256.1~20~025 A1 Site Layout Plan).

The integral units that require depolluting are transported to the main building instead.

Roller shutter doors are closed during dismantling to prevent noise from activities adversely impacting sensitive receptors.

All treatment activities including depolluting and dismantling are carried out within the process buildings, with doors closed.

During the dismantling process (stage 1) the constituent parts of the EoL fridge are separated. These are:

- Metals – Ferrous & non-ferrous
- Oil – removed from integral units – limited volumes created
- Gas – removed during de-gassing of integral units
- Compressors – removed during dismantling of integral units
- Fluorescent tubes – removed during dismantling of units
- Printed Circuit Boards – removed during dismantling of units
- Plastic & rubber – removed during dismantling of units
- Wood – limited volumes liberated from frames of certain types of units
- Insulating panels – non-hazardous (H_2O & CO_2 blown, polystyrene)

- Insulating panels – hazardous (due to flammability when containing pentane)
- General waste – limited volumes created

The results of the dismantling process (stage 1) are the EoL fridge carcasses, i.e. insulation foam panel and metals, which then undergo further treatment.

In the automated treatment process the carcasses are fed by conveyor belt into a size reduction process (shredder/crusher/fragmentiser) and then through a density separator to separate the insulation foam from any non-ferrous material.

The foam then travels along a conveyor into a granulator for further size reduction, this is sent through a cyclone unit and packaged into bags or pelletised.

Given that some of the panels may be hazardous due to their potential flammability (where pentane is present) the system incorporates an extraction/abatement system: any gas released is captured by the extraction system passes through a fabric filter to capture dust and a granular activated carbon (GAC) filter to neutralise volatile organic compounds (VOCs).

The abatement system incapsulates all process points where the insulation foam is size reduced and may release the VOCs, i.e. around the shredder/crusher/fragmentiser and the granulator.

Following processing, dismantling, and separation, separate materials are stored, where appropriate in suitable containers, prior to dispatch from site.

1.3 Site Location

The site, is located within the established industrial estate located on Baron Avenue, Earls Barton, Northampton, NN6 0JE and is shown on K256.1~20~022 Site Location Plan Aerial Image.

The site is located to the north-east of Earls Barton, approximately 5 km south-west of Wellingborough and 11km east north-east of Northampton city centre. The site is centred at National Grid Reference (NGR) 485514, 264571 (SP 85514 64571). The northern site boundary is approximately 255m south of the A4500, Main Road.

The site includes three areas:

- The main building accessed off Baron Avenue
- A second building where the main dismantling (stage 1) process is carried out. This is known as the A1 building. This adjacent to the south of the main building centred at

centred at National Grid Reference (NGR) 485483, 264523 (SP 85483 64523) and is accessed off Mallard Close.

- A storage area located approximately 50m to the West, centred at NGR 485364, 264571 (SP 85364 64601).

A map showing the site location and Permit Boundaries is provided in drawing K256.1~20~022.

Figure 2 shows an aerial view of the area with permit boundary in green.

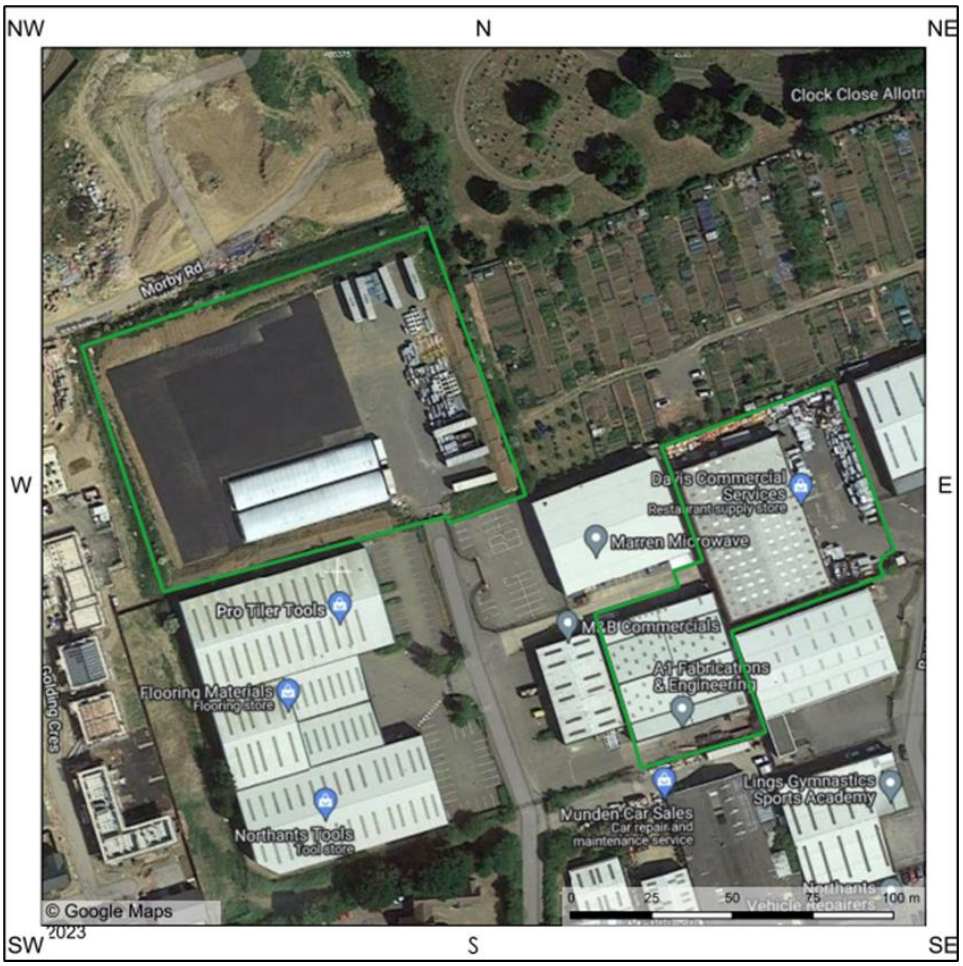


Figure 2. Aerial image of the site, showing the permit boundary in green

There are no Designated Sites of ecological interest within 1km of the site boundaries.

2 SCOPE OF MANAGEMENT SYSTEM

The scope of the Management Plan extends to all operations associated with the acceptance, storage and dismantling of end of life (EoL) commercial refrigeration units, both remote & integral.

The Management Plan documents the key principles, infrastructure, operational activities, methods, and environmental controls for the site.

The Management Plan and contains guidelines and procedures for the site management and operatives to ensure that the site is operated in accordance with the requirements of the Environmental Permit, particularly Condition 1.1.1.

1.1.1 The operator shall manage and operate the activities:

a. in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure, and those drawn to the attention of the operator as a result of complaints; and
b. using sufficient competent persons and resources.

The site operational procedures are under constant review and, where any changes directly impact controls described in the Management Plan, amendments will be made.

A controlled copy of the Management Plan will be held at the main office, and relevant elements made available to staff according to their role within the business. Appropriate training will be provided to all staff commensurate to the role and responsibility.

The Management Plan is part of DCS's Environmental Management System and should be read in conjunction with the other supporting documents (E.g. Fire Prevention Plan), site plans, and the management procedures and controls outlined within this Management Plan.

2.1 ENVIRONMENTAL POLICY

This Management Plan forms part of an integrated management system which is based on formal company policies for Health, Safety, Environment, and Quality, which contains details specific to the site and its operations.

The Environmental Policy provides commitments to:

- Prevent pollution and continually improve;
- Comply with applicable legal and other requirements relating to significant environmental aspects;

- Document, implement and maintain an environmental management system and;
- Communicate to all persons working on or on behalf of organisation.

The company's Management System is used by Senior Management to ensure that environmental performance objectives and targets are achieved by planning and establishing the resources and procedures needed and by monitoring the environmental performance to take corrective action where necessary.

The Management System ensures employees involvement in the environmental performance of the organisation, by establishing the structure and responsibilities, competences, process controls, procedure and records.

Senior managers review the Management System at least annually to check it is still suitable, adequate and effective.

3 SITE INFRASTRUCTURE

The site includes three areas:

- The main building accessed off Baron Avenue
- A second building where the main dismantling (stage 1) process is carried out. This is known as the A1 building.
- The storage yard

These are represented in drawing K256.1~20~028 Site Layout Plans.

Details of the layout of where storage and treatment processes take place in each area are shown in dedicated site layout plans:

- K256.1~20~029 Site Layout Plan Building and Front Yard
- K256.1~20~025 Site Layout Plan A1
- K256.1~20~026 Site Layout Plan Rear Yard

3.1 Site security

3.1.1 Main Process Building and A1 building

The main process building and the A1 building are protected from unauthorised access by a two-meter-high palisade fence. The buildings themselves are secured by roller shutter doors.

Gates and buildings (containing all valuable materials e.g. non-ferrous metals) doors are locked and secured every evening after operations finish.

The site security is visually inspected every night, and 24-hour CCTV coverage operates across the site. CCTV cameras are located both inside the process buildings and outside yard areas, these provide surveillance of the entire site.

Drawing K256.1~20~028 Site Layout Plans shows the approximate location of the CCTV cameras.

3.1.2 Main storage area

The storage area is surrounded by mesh panels 2 m high on all sides. Northern, western and southern sides are also protected by an earth-bound ranging between 1.8m to 0.8 in height. The western side of the storage area is protected by dense hedgerow. The entrance to the area is secured by a gate which is locked and secured every evening after operations finish.

3.2 Site access

The process sites are accessed through palisade security gates which are closed, other than during deliveries to the site, and are secured when the site is unoccupied. Unauthorised persons will be challenged, and all visitors must sign in at Reception.

The storage area is also accessed through palisade gates which are closed, other than during deliveries to the site, and are secured when the site is unoccupied.

3.3 Site information

There is a durable notice board at the site entrance displaying relevant information, including the following:

- The permit holder's name
- Emergency contact telephone numbers for permit holder/operator
- A statement that the site is permitted by the Environment Agency
- The Permit Number
- Environment Agency numbers – 03708 506 506 and 0800 80 70 60 (incident hotline).

3.4 Site Office and Welfare

The process buildings incorporate site offices provided with electricity, telephone/data, fire extinguishers and first aid equipment. A copy of the planning permission, Environmental Permit, and Management Plan will be kept within the main office in digital format. This office is available to staff working within the facility.

Appropriate methods e.g. site diary, visitors' book, electronic records, will be used to record any significant event, e.g. visits by the Environment Agency and other regulatory bodies; incidents & accidents, and any other significant information relating to compliance with the Environmental Permit.

Welfare facilities are provided for both the operational and office-based staff.

3.5 Site Services

The site is provided with mains water, electricity, and telecoms services.

3.6 Construction Procedures & Supervision

Any construction work, infrastructure improvement and replacement will be undertaken by a specialist contractor. A suitably qualified Civil and/or Structural Engineer will inspect works to ensure that all necessary standards and specifications are met.

3.7 Maintenance and Inspection

Weekly inspections of site infrastructure will be undertaken by the Technically Competent Manager (TCM) or a person appointed by the TCM. All defects will be reported and logged in the Site Diary and recorded electronically.

A comprehensive inspection of the concrete surfaces are undertaken monthly, repairs are organised where defects are found to maintain the integrity of the surface and prevent the transmission of fluids.

All containers stored within the site will be clearly marked with their contents and capacity. Container openings will be securely sealed before being moved around site to prevent spillages.

Spill kits are strategically placed within the site. Spill response kits shall be available during the transfer of all substances at the site.

The drainage infrastructure is inspected monthly to ensure they are free flowing, and the integrity has not been breached. If found to be blocked immediate action will be taken to remove and dispose of the blockage.

4 PERMITTED ACTIVITIES

The site is operated as an Installation in accordance with the Environmental Permitting (England and Wales) Regulations 2016 (as amended).

Table 1 (below) shows the currently permitted activities as well as the proposed additional activities of the permit variation. These are:

- Shredding
- Density separation
- Pelletising
- Granulation
- Additional EWC codes:
    - 17 04 01 copper, bronze, brass
    - 17 04 02 aluminium
    - 17 04 03 lead
    - 17 04 04 zinc
    - 17 04 05 iron and steel
    - 1704 06 tin
    - 17 04 07 mixed metals
    - 17 04 10* cables containing oil, coal tar and other hazardous substances
    - 17 04 11 cables other not containing oil, coal tar and other hazardous substances
    - 17 06 03* Other [non ACM] insulation materials consisting of or containing hazardous substances
    - 17 06 04 non ACM insulation materials consisting of or containing hazardous substances
- Storage capacity of WEEE shall not exceed 10,000 tonnes at any one time.
- Annual throughput at the site activities will be up to 40,000 tonnes

Table 1. Permitted activities.

Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
A1	Section 5.3 A(1) (a) (ii) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chemical treatment	R3: Recycling/reclamation of organic substances which are not used as solvents R4: Recycling/reclamation of metals and metal compounds R5: Recycling/reclamation of other inorganic materials	Treatment of refrigeration units consisting of sorting of dismantled parts, separation, manual dismantling, cutting, grading, baling, compacting, crushing, shredding, density separation, granulation, pelletising, condensing, and degassing in line with the standards in Tables S1.3, S1.4 and S1.5. Treatment of refrigeration units shall be carried out within a building provided with weatherproof covering. Treatment of integral refrigeration units consisting of manual degassing in line with the Stage 1 standards in Tables S1.5. Waste types suitable for acceptance are limited to those specified in Table S2.2.
A2	Section 5.6 A(1)(a) Temporary storage of hazardous waste in a facility with a total capacity exceeding 50 tonnes pending any of the activities listed in Section 5.1, 5.2 and 5.3	R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)	Storage of refrigeration units: Refrigeration units shall not be stored for more than 3 months without prior written approval from the Environment Agency. Free storage of refrigeration units shall not exceed a maximum storage height of 3.5 metres (equivalent to 2 EoL cabinets high). Storage capacity of WEEE shall not exceed 10,000 tonnes at any one time. Waste types suitable for acceptance are limited to those specified in Table S2.2. Storage of refrigerants and oils. All other hazardous waste storage pending treatment shall not exceed 6 months, without prior written approval from the Environment Agency.

Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
			All storage shall be on sealed, impermeable surface.
	Directly Associated Activity		
A3	Physical treatment for the purpose of recycling	R3: Recycling/reclamation of organic substances which are not used as solvents R4: Recycling/reclamation of metals and metal compounds R5: Recycling/reclamation of other inorganic materials	Treatment consisting only of sorting, separation and grading of dismantled materials.
A4	Storage of processed materials, excluding temporary storage of hazardous waste under Section 5.6 A(1)(a)	R13: Storage of waste pending the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)	Storage of recovered dismantled fractions and residues following treatment.
A5	Raw materials storage	Storage of raw materials including diesel.	From the receipt of raw materials to dispatch for use within the facility
A6	Air Emission Abatement	Collection and treatment of air from the buildings or plant using an air emissions abatement system prior to release to atmosphere	From the collection of air from site processes to treatment and release of treated air to atmosphere.
A7	Site drainage discharge	Discharge of site drainage from storage and treatment areas.	Drainage discharge at point S1 and S2 as shown on plan in Schedule 7, and according to the requirements of the approved water monitoring plan.

Activity reference	Description of activities for waste operations	Limits of activities
A8 Refrigeration units' storage and pre-dismantling treatment	R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) R3: Recycling/ reclamation of organic substances which are not used as solvents	Waste types suitable for acceptance are limited to those specified in Table S2.3. All storage shall be on sealed, impermeable surface. Free storage of refrigeration units shall not exceed a maximum storage height of 3.5 meters. Treatment of integral refrigeration units consisting of manual degassing in line with the Stage 1 standards in Tables S1.5.
	R4: Recycling/ reclamation of metals and metal compounds	Treatment of WEEE shall be carried out within a building provided with a weatherproof covering. Treatment of refrigeration units consisting of sorting of dismantled parts, separation, manual dismantling, cutting, grading, baling, compacting, crushing, shredding, density separation, granulation, pelletising, condensing, and degassing in line with the standards in Tables S1.3, S1.4 and S1.5.
A9 WEEE preparation for re-use	N/A	Testing of WEEE to guarantee fit for re-use.

5 ANNUAL WASTE QUANTITIES

The annual throughput at the site activities will be up to 40,000 tonnes.

6 RECEPTION, HANDLING & STORAGE OF WASTE

The following section describes the operational techniques that are implemented on site to control the release of any potentially polluting substances to the environment during reception, handling and storage of the waste.

All operations and working practices are regularly reviewed and improved where necessary. There are robust mechanisms in place for investigation of incidents/accidents if they occur.

6.1 Pre-Acceptance Procedure

At the Earls Barton facility, no ODS (ozone depleting substances) containing refrigeration units will be accepted for treatment.

DCS accepts commercial EoL fridges, and source segregated insulation panel and metals. The types of wastes to be accepted at the site are detailed in the List of Waste (K256.1 ~09~009).

A pre-acceptance procedure is followed in accordance with section 3.1 of the EA's appropriate measures guidance for WEEE and WTE.

The only EoL fridge units and insulating panels accepted are the following:

- using hydrofluorocarbons (HFCs), hydrocarbons (HCs) as refrigerants;
- using CO_2, water and HCs as insulating panels blowing agents.

To help determine the type of refrigerant and blowing agent prior to being scheduled for delivery to site, where possible, a pre-acceptance procedure will be used to gather information about the type of units in the load, obtained from the waste producer and assessed for acceptability.

As a minimum, information for each load will include:

- Manufacturer
- Type of unit (remote, integral)
- Information reported on the "appliance rating plate"
- Source of the refrigeration unit
- Type of refrigerant used
- Weight(kg)
- Volume

The following information will also be collected if available:

- Age of the unit

- Blowing agent used in insulating panels

Waste producers are encouraged to send pictures of the units in the load as well as pictures of the rating plates/labels, when available.

The Technical Competent manager (TCM) (or nominated alternative) will review the information provided to determine whether it is sufficient for acceptance of the waste on site.

Where the information provided is deemed insufficient, the Operator will request further information from the waste producer.

Where uncertainties remain on whether the refrigeration units in a load are compliant with the Permit, a precautionary approach will be used, and the operator will decline the load.

For every enquiry, the load is given a unique reference number, contents of the load listed along with the information provided by the waste producer, and whether the load has been accepted or not. The information is recorded.

The load schedule information is transferred daily to a database and will be used to ensure that capacity is available, as part of the site's stock control. Where there is no capacity, the load shall be declined at the pre-acceptance check stage.

6.2 Waste acceptance

On receipt at the site the waste acceptance procedure will include review against pre-acceptance information, duty of care paperwork (Hazardous Waste Consignment Notes (HWCN) or Waste Transfer Note) and a visual check for unit integrity and compliance. All relevant staff are trained in the waste acceptance procedure, which includes a visual inspection to identify any non-conforming wastes within the load.

- DCS-HSE-08 Waste acceptance
- DCS-SOP-04 Unloading vehicles

DCS will only accept those wastes that comply with the permit. Non-conforming loads will be quarantined or rejected depending on quantity of non-conforming waste.

All deliveries of units for processing arrive at the main storage area or main building front yard and are weighed on the weighbridge.

The duty of care paperwork (Hazardous Waste Consignment Notes (HWCN) or Waste Transfer Note (WTN)) shall be examined to check that it meets the legal requirements and that the information provided at the pre-acceptance stage is consistent.

The load shall then be subject to a visual check: trained operational staff shall check the load to ensure that the load contains only the units described in the schedule and duty of care documents. Non-permitted loads will be rejected at this stage and not allowed to be unloaded.

A detailed check is carried out to ensure the HWCN/WTN number matches the number consigned, and for the presence of units containing Ozone Depleting Substances (ODS) (as refrigerant and panels blowing agent) and Hydrofluorocarbon (HFC) (blowing agent).

Where identified after unloading non-permitted waste will be segregated and stored in a designated quarantine/isolation area prior to removal from site (Quarantine area in Site Layout Plan Storage Area K256.1~20~026).

Contaminated or non-conforming loads identified during the initial inspection will be rejected and details of the rejection along with dates, times and reasons recorded.

Where limited volumes of non-conforming material are identified the technically competent manager (TCM) will be consulted. Where possible and if safe to do so contaminated or non-conforming material will be removed by hand and quarantined pending recycling, recovery or disposal at a suitably permitted facility.

EoL fridges stored on site will be subject to regular inspections to identify any leaks, deteriorating containers and any other potential fire risks. Any faults identified will be reported to the technically competent manager (TCM) and records of preventative or corrective actions taken will be kept in the site diary.

6.3 Tracking

A tracking system is used to record load delivery and for tracking of the units through the facility (See K256.1~09~005 BAT DCS Technical Description and BAT Assessment).

Once unloaded, each unit will be labelled according to their type (remote or integral). The information is recorded, and a unique label created for each unit which links to key information. Other useful information may be recorded e.g. date of arrival so that the operator can easily assign each unit to the correct treatment process and check storage limits will not be exceeded.

Once labelled, the integral and remote units are, stored in the work queue, prior to being sent for treatment. Integral units are degassed before the manual dismantling process.

Both unit types undergo manual dismantling. The manual dismantling process segregates the components of the units, which are stored in separate containers.

The records are kept up to date on an ongoing basis to reflect deliveries, on-site treatment and despatches.

All records relating to pre-acceptance will be maintained and available at the site's office for cross-reference and verification at the waste acceptance stage.

Records will be held for a minimum of two years after

6.4 Reception

All drivers must be wearing appropriate Personal Protective Equipment (PPE) before beginning the unloading process.

Waste deliveries will be inspected upon arrival: where inspections of the integral units indicate that they are leaking and/or have exposed foam then the unit will be moved to the process building for processing within 48 hours.

Where inspection of remote units indicates that they have exposed foam then the unit will be moved to the process building for processing within 72 hours.

Units stored in the storage area which are subsequently found to be leaking and/or have exposed foam (depending on the type of unit) will be moved to the process building, as soon as possible during the working day.

6.5 Process Controls

- Staff always wear the correct PPE provided by the Company. Report any wear and tear so that it might be replaced.
- Drivers drive around site in accordance with site driving rules.
- Only trained operators may operate machinery on site in accordance with operational procedures.
- Staff are aware of their own working area and others who may enter it.
- Staff engage positively with site rules and if unsure contact their Line Manager.

6.6 Handling & Storage

Whilst obviously dependent upon planned maintenance and refurbishment programmes at the retail operations that use remote and integral units the site will receive refrigeration cabinets which will be stored prior to dismantling. It will be the responsibility of the senior management to ensure that stock control is within the constraints of the permit, and that there is sufficient processing capacity, so as to avoid over or under stocking.

6.6.1 Main storage area

Remote and pre-treated integral units will be delivered, inspected, and stored in the storage area, within which each individual storage pile will be no more than 420m^3 within the following dimensions: 15m wide, 7m long, and 4m high.

An area will be designated for storage of integral EoL refrigerators, which may contain a very small quantity of refrigerant gas and oils. This storage area will in normal conditions not exceed 100m^3. Only EoL units in good conditions (i.e. no gas or oil leakage identified during acceptance checks) will be stored in this area. Due to the constant turnover of stock, this area will not be fixed but will be managed by the member of staff responsible for the storage area. The tracking system will allow identification of integral or remote units.

If following allocation to a storage area, routine site inspections identify any leakage; exposed foam or other issue which may give rise to harm to human health or the environment, the units would immediately be moved to the process building for treatment.

On an ‘as required’ basis units will be moved from the storage area to the process site, here they will either be offloaded directly into the dismantling area, or to the operational storage area where they will be moved to the dismantling area when capacity is available.

Maximum storage capacity will be determined on the basis of area of storage available at that time, detailed information will be provided within the Fire Prevention Plan (FPP) (K256.1~09~007). The storage area has been developed, covering an area of approximately 9700m^2. Actual locations and numbers of stockpiles will be dependent upon space available at the time, whilst dimensions may vary they will always be such that the maximum volume of any one stockpile is not exceed, whilst maintaining separation distances described in the FPP.

The site is equipped with electric forklift trucks and one 360 loader.

All equipment is periodically inspected in accordance with manufacturers’ guidance and manuals to ensure the plant and equipment is available for work when required.

Integral EoL fridge units are handled with a forklift clamp attachment and in a away that avoids accidental damage to the unit, in particular to the cooling circuits, to avoid accidental leakage of hazardous substances and refrigerant gases.

6.6.2 Process site

Units will be moved from the main storage area to the A1 process building on an ‘as required’ basis, these units will be placed in the ‘to be worked’ bay (see Plan K256.1~20~025). It is anticipated that the number of units in this area will be sufficient to provide working stock for

the dismantling area for the subsequent working day. Whilst numbers of units in this area will vary across the working day, at the end of the working day the volume of units will not exceed 450m^3.

The purpose of the dismantling operation is to separate component materials with the aim of maximising resources recovery at other permitted sites. As units are dismantled materials are liberated, such as;

- Metals – Ferrous & non-ferrous
- Oil – removed from integral units – limited volumes created
- Gas – removed during de-gassing of integral units
- Compressors – removed during dismantling of integral units
- Fluorescent tubes – removed during dismantling of units
- Printed Circuit Boards – removed during dismantling of units
- Plastic & rubber – removed during dismantling of units
- Wood – limited volumes liberated from frames of certain types of units
- Insulating panels – non-hazardous (H_2O & CO_2 blown, polystyrene)
- Insulating panels – hazardous (due to flammability when containing pentane)
- General waste – limited volumes created.

Storage of combustible materials will not exceed the capacity identified in the FPP guidance. Specific details are found in the FPP (K256.1~09~007).

Hazardous waste such as fluorescent tubes, printed circuit boards and compressors will be stored in containers within the main building.

Table 2 Material storage

WASTE TYPE	FORM OF STORAGE[2]	APPROXIMATE CAPACITY
Refrigeration units (Integral & remote)	Freestanding stockpile	Working volume during day reducing to 450m^3 maximum
Metals – ferrous & non-ferrous	Contained – stockpile in concrete walled bay	240m^3

[2] Indicative form of storage, alternative options may be utilised to provide similar scale & type of storage.

WASTE TYPE	FORM OF STORAGE[2]	APPROXIMATE CAPACITY
Plastic & rubber	Contained – 12 yd^3 Skip or IBC	9m^3 per skip 1m^3 per IBC
Insulating panels	Contained – stockpile in concrete walled bay	240m^3
Wood	Contained – 12 yd^3 Skip or IBC	9m^3 per skip 1m^3 per IBC
Glass	Contained – 12 yd^3 Skip or IBC	9m^3 per skip 1m^3 per IBC
Printed circuit boards	Contained –IBC	1m^3 per IBC
Compressors	Contained –IBC	1m^3 per IBC
Fluorescent tubes	Contained – lamp container pallet box	1m^3
General waste	Contained – 40 yd^3 Skip or wheelie bin	30m^3

6.7 Waste Dispatch

Any waste leaving the site will be accompanied by a written description, and due diligence checks will ensure that they are transferred to a suitably permitted waste management facility, by a registered waste carrier.

7 TREATMENT PROCESS

Waste treatment activities will primarily be restricted to removal of oil and de-gassing (Integral units only), manual dismantling, separation, and segregation into distinct materials, granulation, density separation and size reduction prior to subsequent dispatch of the materials to permitted facilities for recycling, recovery, or disposal.

During waste treatment activities control measures are employed to ensure the minimisation of dust, noise, and other potential nuisances. Waste treatment activities will be undertaken within the process building which is underlain by an impermeable surface with sealed drainage system.

The main treatment stages are the following:

- Removal of refrigerants and oil: this is only required for the integral refrigeration units. Refrigerants from the temperature exchange equipment are extracted into gas tight pressure vessels, using a dedicated refrigerant recovery station.

  The vessels are stored in a dedicated area within the depollution area in the Site Layout Plan K256.1~20~029. When full vessels are dispatched from site for recovery of the refrigerant gases in a specialised facility.

  Given that integral units form a minor part of the materials received at the site, collection and dispatch of vessels is in-frequent.

  Compressor oil is removed by suction in the same area of the de-gassing process. Recovered oil is contained prior to collection and disposal by a specialist contractor.

  De-oiling and degassing is carried out according to the internal procedure DCS-SOP-02 Degassing units.

- Dismantling and Separation: EoL units are manually dismantled and recyclable metals, and other materials separated. All hazardous material such as fluorescent tubes, and insulation panels where pentane has been used as the blowing agent are removed and stored in dedicated areas.

  Dismantling and separation is carried out according to the internal procedure DCS-SOP-05 Manual dismantling

The following materials are (subject to a WM3 assessment) classified as hazardous wastes and are stored within the building:

- Compressors
- Fluorescent tubes
- Printed circuit boards
- Electrical Cables

Other separated components are classified as non-hazardous wastes and may be stored within appropriate containers in the front yard, awaiting dispatch to recovery/recycling facilities. These are:

- Other lamps e.g. LED, halogen and incandescent
- Plastics and rubber
- Glass
- Metals

The following materials are also classified as POPs waste (unless otherwise identified):

- Printed circuit boards
- Electrical Cables
- Plastics and rubber

The main components of the refrigeration unit carcasses may undergo further treatment. These are:

- Insulating panels
- Ferrous metals
- Non-ferrous metals

The dismantled sections are fed by conveyor belt into a size reduction process (shredder/crusher/fragmentiser) and then through a density separator to separate the insulation from any non-ferrous material.

The foam then travels along a conveyor into a granulator for further size reduction, this is sent through a cyclone unit and packaged into bags or pelletised.

Given that some of the panels may be hazardous due to their potential flammability (where pentane is present) the system incorporates an extraction/abatement system: any gas released is captured by the extraction system passes through a fabric filter to capture dust, followed by a granular activated carbon (GAC) filter to neutralise VOC’s.

The abatement system incapsulates all process points where the insulation foam is size reduced and may release the VOCs, i.e. around the shredder/crusher/fragmentiser and the granulator.

Following processing, dismantling, and separation, materials are stored, where appropriate in suitable containers, prior to dispatch from site.

8 SITE & EQUIPMENT MAINTENANCE

8.1 Equipment Maintenance

Regular inspection and servicing are carried out to prevent failure during operation of the equipment.

Equipment will be maintained regularly and will be subject to a periodic inspection by an independent engineer, in accordance with the manufacture's guidelines. All breakdowns or faults will be recorded.

Portable appliance testing (PAT) of electrical equipment is done annually.

Consumable components such as rubber seals are replaced routinely according to a planned maintenance schedule. A supply of critical spares will be maintained.

All forklift trucks are electric vehicles and will be maintained in accordance with manufacturer guidelines.

The 360 loader will be maintained in accordance with manufacturer guidelines to prevent fuels and combustible liquids leaking or trailing. Fuel will be stored within secondary containment.

The maintenance of this site covers the following:

ITEM	MAINTENANCE ACTIONS
De-gassing de-oiling system	• Maintained daily/weekly by operator. • Other service work carried out by an external maintenance engineer.
Forklift Trucks DCS-HSE-04 Forklift truck operation	• Maintained daily/weekly by operator. • Other service work carried out by an external maintenance engineer. • Twice yearly inspection carried out by engineer for insurance purposes.
Crusher/shredder/fragmentiser	• Maintained daily by operator. • Oil / Filter change every 1500 hours by machine owners. • Serviced every 3 months.
Water based density separator	• Annual maintenance by specialist engineer • Daily visual inspection by operator • Quarterly change of water (minimum)

ITEM	MAINTENANCE ACTIONS
Granulator	• Maintained daily/weekly by operator. • Other service work carried out by external mechanical engineering.
Copper mill	• Annual maintenance by specialist engineer • Maintained daily by operator
Conveyor system	• Maintained daily by operator. • Oil added to rollers monthly.
Extraction system	• Annual maintenance by specialist engineer • Maintained daily by operator
GAC filters (abatement system)	• Changed at least every 2 years (as recommended by manufacturer) or where measurements of VOCs show levels above the BAT threshold (see K256.1~09~005 for details).
Pest Control	Pests are not considered a significant risk at site however there are potential sources (whilst unlikely units may contain limited food residues). The following measures have been put in place to minimise risk. • Refrigeration waste is rejected if food waste is detected in significant quantities. • Containment of any food waste received in a sealed environment.
Fire Extinguishers	• Checked weekly. • Serviced every 12 months. • Replaced after use.
Fire Alarm	• Tested weekly. • Serviced every 6 months.
Electrical equipment in offices	• Checked daily visually by staff. • Inspected annually. • Earthed equipment (kettles, microwaves) tested every 2 years. • Other office electrical equipment tested every 5 years. • Cables/leads extension cables: regular visual inspection. • Quarterly inspection in offices and warehouse and combined inspection and testing every 2-5 years depending on equipment it is connected to.

ITEM	MAINTENANCE ACTIONS
	• Fixed electrical wiring every 5 years.

All lifting equipment is inspected and tested by an external auditor on an annual basis.

Weighing equipment is inspected and tested on annual basis by an external auditor in accordance with the Weight and Measures Act 1985.

All calibrations are undertaken by an approved subcontractor.

All other onsite maintenance, services, repair issues are handled as one-off jobs.

All maintenance is recorded. Site management have the emergency contact numbers for the maintenance companies of our equipment. Where appropriate critical spares will be held to ensure that downtime of essential equipment is limited.

All procedures include written instruction on how to undertake tasks, equipment involved, PPE/safety equipment required and potential hazards. Each procedure is accompanied by an activity risk assessment.

The HSEQ Manager maintains a register of maintenance of all equipment and systems (‘Monitoring Matrix’).

8.2 Maintenance of Surfaces and Drainage System

The integrity of surfaces and the drainage systems will be checked as part of routine site inspections.

The surface water drainage system will be kept clear to ensure capacity is retained and all water run-off is collected, with only clean run-off discharged when shut off valves are open.

All areas are subject to regular housekeeping and the site is tidied and checked prior to closing for the day. All working areas are swept and cleared to remove debris and minimise fire risks.

8.3 Site Operational Procedures

The site is operated in accordance with a number of written procedures incorporated within DCS’s Management System.

All procedures include written instruction on how to undertake tasks, equipment involved, PPE/safety equipment required and potential hazards. Each procedure is accompanied by an activity risk assessment.

The HSEQ Manager maintains a register of standard operating procedures (SOPs) in the management system.

SOPs are used for staff training and are accessible to operators for reference at all times.

8.4 Training

It is the responsibility of Senior Management and the HSEQ Manager to ensure that no unauthorised persons operate equipment on site.

Operation of the equipment is carried out exclusively by staff that are fully trained in safe working practices and the safety features of the equipment.

Individual operators have access to the operation and maintenance manuals of the equipment they use as well as SOPs in the Management System.

The HSEQ Manager maintains a ‘Training Matrix’ in the management system that tracks training provided to all staff.

9 CONTINGENCY PLAN

9.1 Equipment

The confined Arjes Impaktor 250 and WHC 800/450 granulator system manufacturers offer a 24-hour breakdown service which would guarantee any fault of the system to be fixed within 1 to 2 working days before normal operation is restored. The site holds sufficient storage capacity to prevent build up beyond the maximum capacity.

If necessary, because of a breakdown, site vehicles can be replaced by lease hire vehicles within 24 hours. This is likely to occur for any site equipment requiring a repair period of more than 48 hours.

This will ensure no delay in rotating storage of wastes within the premises. This will continue until the equipment is repaired and running.

In case of failure of the GAC abatement system, the carbon filter can be replaced within the next day. The carbon filter is provider by a local company approximately 1 hour away from site.

9.2 Fire

To minimise the risk of a fire, fire prevention measures are implemented on site according to DCS's Fire Prevention Plan (K256.1~09~007) and procedure DCS-HSE-02 Prevention and fighting of fire. The Fire Prevention Plan will be reviewed at least annually and following any significant changes to activities, materials generated and storage requirements.

In the event of an outbreak of fire, which can't be immediately contained, the site will be evacuated, and all site operations will cease until the fire has been extinguished or it is safe to resume. The Environment Agency will be notified as soon as is practicable.

In the event of an entire plant shutdown, EoL units booked for delivery will be diverted to alternative permitted facilities until the site is fully operational again. The site will also retain sufficient storage volume to stockpile wastes awaiting treatment should treatment machinery or personnel not be available.

Following any fire or incident that may impact fire prevention measures the FPP will be reviewed and updated where required.

9.3 Flood

The site is not in a location identified as having a significant risk of flooding (K256.1~09~003 Environmental risk Assessment). Whilst flooding is unlikely, and if it did occur would be

localised, site management will determine, and actions required and communicate these to members of staff.

10 ACCIDENT PREVENTION & MANAGEMENT

Potential accidents and incidents have been identified in the in the Accident Prevention and Management Plan (Appendix A).

This includes the following Possible Accident/Incident:

- Spillages
- Plant or equipment failure
- Containment failure
- Fire
- Storage of hazardous substances
- Explosive atmospheres (DSEAR)
- Vandalism
- Flooding

Accident prevention and management will be reviewed on an annual basis along with the Management Plan, or following any significant accident or incident.

DCS's General Risk Assessment for the site identifies the foreseeable risks on site and provides details on how risks will be controlled.

Potential accidents and incidents have also been identified within Table ERA13 of the Environmental Risk Assessment (ERA) (K256.1~09~014), where management procedures and controls are identified to reduce any identified risk.

Accident prevention and management will be reviewed on an annual basis along with the Management System or following an accident.

10.1 Near misses and incidents reporting

Every near miss reported is recorded by the HSEQ manager in a Near Miss tracker and an incident report tracker.

Any accident of fugitive emission which has caused, is causing or may cause significant pollution will be reported to the EA without delay. Written confirmation of actual or potential pollution incidents will be reported to the EA within 24 hours.

11 WASTE MANAGEMENT

The site produces limited quantities of non-recoverable waste streams which are not forwarded to further re-processors. Those residual wastes are managed through contract with a waste management company.

12 TRAINING & COMPETENCE

The HSEQ Manager maintains a 'Training Matrix' in the management system that tracks training provided to all staff.

12.1 Management

A Technically Competent Manager (TCM) holds the relevant competence through schemes approved under the Environmental Permitting (England and Wales) Regulations 2016 (as amended).

Details of Technically Competent Manager(s) (TCM) will be provided to the Environment Agency and reported through the national operator waste returns. Copies of Certificates will be held on site. At times where the specified TCM(s) is/are unavailable, an alternative TCM cover arrangements will be made.

Responsibilities include day to day operations and activities at the site, ensuring compliance with Permit and planning conditions and ensuring compliance with Health, Safety and Environmental Policies.

The HSEQ Manager is responsible for reviewing and amending Health, Safety and Environmental policies and assisting the TCM with achieving compliance and liaison with the Environment Agency and other regulatory bodies.

12.2 Staff

All site staff will be given instruction on relevant elements of the Environmental Permit, this Management Plan and the wider management system; to effectively and efficiently carry out their job function. Training will be documented, and records kept.

All staff members are given training on fire safety and will receive refresher training as appropriate.

Staff members are shown the correct methods of using fire extinguishers during fire drills. All employees are trained to detect and respond to fires, and to implement measures to control fire water.

12.3 Competence and Awareness Training

All site staff will be given relevant training and supervision on the procedures, machines and equipment used at the site.

All new site staff are taken through an induction process, covering all areas of site operations, including company policies, operational and emergency procedures, risk assessments, site rules, and all relevant conditions of the Environmental Permit.

It is the responsibility of Senior Management, the HSEQ Manager and the TCM to ensure that no unauthorised persons operate plant and equipment on site.

Operation of the equipment is carried out exclusively by operators fully trained in safe working practices and safety features of the equipment.

Individual operators have access to operation and maintenance manuals of the equipment they use.

Staff training is reviewed regularly through refresher courses, to ensure continued competence in their daily tasks.

13 COMPLAINTS

All complaints relating to waste management activities covered by the environmental permit will be investigated.

The format of any investigation, and how it is recorded, will be determined by the type and scale of impact suspected. An investigation will incorporate some or all of the following, and supplemented where required, at the direction of a senior manager.

- Review details of complaint.
  - Location, type of impact, visit location of complaint (if known), does current wind direction preclude site being source?
  - Does the complaint relate to specific time or operation?
- Investigation of operational activities
  - What activities were occurring at the time of the complaint?
- Investigation of operational controls.
  - Are all specified operational controls being followed?
  - Are they sufficient?
- Investigate other potential sources
  - E.g. surrounding land local industrial areas, etc.
- Corrective or Preventative Action –
  - Where the investigation identifies this as being required this will be recorded; responsibility will be allocated; preventative or corrective actions specified, and completion required within a defined timeframe.
- Feedback
  - Provide feedback to complainant (if known) and regulatory authorities, as required.
- Review
  - Review complaints on a quarterly basis to identify any trends.

To make a complaint clients and members of the public can submit an email to the HSEQ Manager

13.1 Complaints Reporting

Records relating to management review, complaints, internal audits and inspections are held for a minimum of six years.

All complaints will be acknowledged and investigated by the TCM, or nominated person, with resultant actions reported to the complainant and the EA.

13.2 Community Engagement

On receipt of a complaint, the TCM, or nominated person, will investigate the complaint to swiftly rectify the source.

Where contact details are made available, the complainant will be contacted within 24 hours to check that the mitigation measures rectify the issue.

Where additional time is required to undertake repair or replacement of infrastructure which has caused the complaint, the complainant will be contacted with details on the actions being taken and the estimated timescale for completion.

14 DOCUMENTS & RECORDS

As a minimum, the following records must be kept ensuring compliance with the requirements of the Environmental Permit:

- A copy of the site permit;
- Site management plans;
- Operational procedures;
- Site and activity risk assessments;
- Competence and training records;
- Compliance records; and
- Duty of Care documentation and Environment Agency (EA) waste returns.

Records must be retained for 6 years; unless they relate to off-site environmental or health effects, or the condition of the land or groundwater when they shall be retained until permit surrender.

Copies of all relevant Environmental Permits, access to the Management System, and any other codes of practice will be available at the site office, with electronic back-ups.

Records of all waste received at, and removed from, the site will be maintained on site and reported to the EA on a quarterly basis.

Records will be kept in accordance with The Waste (England and Wales) Regulations 2011 (as amended) and the conditions of the Environmental Permit.

The Permit requires the creation and retention of specific records; Condition 4.1 details how these must be kept, and for how long.

Table 3. Records required by the permit

Condition	Requirement	Record
1.1	Records to demonstrate activities are managed in accordance with a management system	This Management Plan and associated documents
1.1	Records to demonstrate activities are managed by sufficient persons	Evidence of technical competence Staff training records
TBC	Accident Management Plan	Accident Risk Assessment & Management Plan
TBC	Records of all wastes accepted onto the site	Duty of Care Waste Transfer Notes Weighbridge tickets
TBC	Records of all wastes sent off site from the activities	

Condition	Requirement	Record
4.2	A quarterly summary report of waste types and quantities accepted and removed from the site. Submitted within one month of the end of each quarter. Q1 Jan – Mar by 30th April Q2 Apr – Jun by 31st July Q3 Jul – Sep by 31st October Q4 Oct – Dec by 31st January	Waste Return

14.1 Notifications

Condition 4.3 specifies under what circumstances the Environment Agency must be notified. Whilst the table below summarises these, reference should always be made to the current Environmental Permit to confirm exact requirements.

Table 4. Notifications required by the permit

CONDITION	REQUIREMENT	WHEN
4.3.1	Any malfunction, breakdown or failure of equipment or techniques which has caused, is causing or may cause significant pollution	Without delay
4.3.1	Any accident of fugitive emission which has caused, is causing or may cause significant pollution	Without delay
4.3.2	Written confirmation of actual or potential pollution incidents.	Within 24 hours
4.3.3	Written notification of permanent cessation of activities	Prior to event
4.3.3	Written notification of cessation of all or part of the activities for a period likely to exceed 3 months	Prior to event
4.3.3	Written notification of resumption of the operation of all or parts of the activities	Prior to event
4.3.4	If the EA has requested in writing when monitoring or spot sampling is undertaken, then this information must be provided	14 days prior
4.3.5	Changes in technically competent management	Within 7 days of change
4.3.6	Conviction of permit holder, or any relevant offence	Within 14 days
4.3.7	Appeal against conviction and of outcome of appeal	Within 14 days
4.3.8	Specified changes to company details	Within 14 days
4.3.9	Commencement of any of the activities	7 days in advance

14.2 Security

Records shall be kept securely within the site office. Where held electronically these shall be backed up on a regular basis and a copy held off site.

14.3 Availability

In accordance with Condition 4.1.1, all records required under the terms of the Permit shall:

- Be legible;
- Be made as soon as reasonably practicable;
- If amended, be amended in such a way that the original and any subsequent amendments remain legible or are capable of retrieval; and
- Be retained, unless otherwise agreed with the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until Permit surrender:
    - off-site environmental effects; and
    - matters which affect the condition of land and groundwater

15 ENVIRONMENTAL MANAGEMENT

15.1 Litter Control

Given that the predominant waste input is EoL units, the generation of litter is unlikely to be a significant issue.

All incoming and outgoing loads are covered. Furthermore, any skips containing loose general waste or other non-hazardous waste will also be covered if required to prevent the escape of litter.

The site will be subject to regular housekeeping and staff will be required to litter pick on a 'see it, pick it up' basis.

Whilst unlikely, where litter is identified as a nuisance at or near to the site boundary, the site manager will immediately organise the collection of litter.

The source of the litter will be investigated and removed to a covered container ready for disposal.

15.2 Odour Control

The types of materials received at the site mean that, under normal circumstances, they do not contain significant quantities of putrescible wastes. Whilst unlikely, where such material is observed the following measures have been put in place to minimise risk.

- Units will be rejected if putrescible waste is detected in significant quantities
- Where limited amounts are observed this will be removed and contained within the general office waste container and arrangements made for disposal.

Any odour complaints received at the site will be investigated by the TCM/HSEQ and their findings will be used to inform corrective and preventative actions.

15.3 Dust Control

Due to the nature of the materials received on site the likelihood of dust generation is limited. Nevertheless, operations are conducted to ensure that risk is negligible.

Visual inspection of external site areas will be made for dust generation and/or deposition. Regular inspection of the site perimeter will also be made to assess for presence outside the site boundary.

Findings will be recorded, and corrective/preventative action taken as appropriate.

Dust generated by the insulation panel process will be captured by the extraction and adsorption system. Dust measurements from the extraction system will be performed as per the Environmental permit schedule to verify that the dust levels remain below the set values.

15.4 Noise Control

Adverse noise impact is unlikely due to the industrial setting, the site being adjacent to other light industrial uses which provide a similar noise profile, limited sensitive receptors and intermittent use of plant and equipment.

Noise will be monitored qualitatively daily and, where risk assessment identifies any occupational exposure issues this will be addressed through the provision of appropriate personal protective equipment (PPE).

All plant and machinery will be maintained to manufacturer's specifications to ensure operation does not lead to noise and vibration above that set out in the manufacturer's specification information.

Whilst the operation is within an established industrial estate and has operated for a number of years without complaint, following pre-application advice provided by the EA, a noise impact assessment has been carried out by a specialist sub-contractor to assess the level of noise at the closest residential receptor to site. Whilst the assessment indicates that a limited number of residential properties (location A) may experience significant adverse impact, in the absence of complaint either from neighbours or regulatory bodies, the situation will continue to be monitored and reviewed and where changes in circumstances dictate then additional noise mitigation measures will be considered.

15.5 Pests, Vermin, Birds

The types of wastes accepted, stored, and treated at the site are unlikely to generate significant issues relating to the attraction or harbouring of pests, vermin or birds.

All reasonable measures will be taken to prevent and minimise the occurrence of pests.

The only potential issue are refrigerators containing food. The following measures have been put in place to minimise risk.

- Units will be rejected if putrescible waste is detected in significant quantities
- Where limited amounts are observed this will be removed and contained within the general office waste container and arrangements made for disposal.

Daily site inspections and good housekeeping procedures will be maintained in order to reduce any occurrence and allow appropriate measures to be taken where necessary.

If an increase in a pest population is observed, the source will be investigated in order to undertake the most effective mitigation measures.

15.6 Mud and Debris

The likelihood of vehicles carrying significant volumes of mud or debris which would then be tracked onto main roads is limited. However, vehicles will be visually checked in wet conditions. Any vehicles found to be carrying mud or debris on the wheels or chassis will be cleaned down prior to exiting site.

Where observation identifies an issue, this will be recorded in the site diary along with any subsequent corrective or preventative actions.

16 EMISSIONS AND MONITORING

16.1 Emissions to Air, Water or Land

There are two point source emission points to air from the Stage 2 and process (Plan K256.1~20~029).

Monitoring and abatement measures of emission to air from this point source emission are described in the Technical Description and BAT Assessment document K256.1~09~005.

Other appropriate measures have been taken to control emissions of substances not controlled by emissions limits, as described below.

16.2 Air

The site is located within an industrial area on the northern outskirts of the village of Earls Barton, Northampton.

The closest critical infrastructure are the industrial buildings immediately adjacent to the southern and western boundaries of the site. The site boundaries are separated by a fence. In the event of a fire the following measures will be taken to minimise emissions to air.

Due to predominantly north westerly or south westerly prevailing winds, the receptors most at risk from emissions to air are the residential and sensitive public use receptors to the northeast and commercial receptors to the southeast.

The waste treatment process is unlikely to produce significant emission to air.

In case of fire, at the request of the Fire and Rescue Service, occupants in the surrounding properties (industrial and residential) may be advised to remain indoors for up to 4 hours (based on the EA planned maximum duration for a fire incident).

Smoldering or burning material will be isolated and extinguished (if safe to do so) using one of the fire extinguishers strategically placed around site.

If required traffic will be directed away from the site, local media may be informed and provided with public safety advice by the Fire and Rescue Service.

16.3 Land

The underlying bedrock at the site is the Northampton Sand Formation – Ironstone. This is overlain by superficial deposits of Glaciolacustrine deposits, Mid Pleistocene – Clay and silt.

The site is not in an area identified as at risk of flooding.

Under abnormal or emergency conditions all reasonable measures will be taken to ensure potentially contaminated water run-off (e.g. firewater run-off) will not leave the impermeable hard surface area.

EoL units and separated metals are stored on an impermeable surface and in the event of a fire, smoldering, burning or extinguished material will be isolated and moved to the quarantine area.

The drainage system can be isolated using shut off valves to avoid the loss of potentially contaminated water to surrounding land.

16.4 Water

Information on the Environment Agency website indicates that the site overlies a Secondary A aquifer in the bedrock.

The site is not in a groundwater Source Protection Zone (SPZ).

Under abnormal or emergency conditions potentially contaminated water will be retained on site with no discharge to groundwater, the risk to the aquifer is considered to be LOW.

There are no surface water features within 250m of the site. The risk to surface water is considered to be LOW.

Fire water will be captured by the impermeable surface and sealable drainage system. Where possible, and under the direction of the Fire Service, potentially contaminated water associated with active firefighting will not be discharged via the surface water drainage. All potentially contaminated water and material will be removed from site once safe to do so.

Samples will be taken monthly and visually inspected for contamination and quarterly sent for analysis in line with K256.1~09~005 BAT DCS Technical description and BAT.

17 CLIMATE CHANGE

Potential effects from climate change have been identified within Table ERA15 of the Environmental Risk Assessment (ERA) (K256.1~09~014), where management procedures and controls are identified to reduce identified risk.

The effects of climate change and management will be reviewed on an annual basis, along with the Management System or following an extreme climate event.

18 REVIEW THE MANAGEMENT SYSTEM

The Management Plan will be reviewed in its entirety at least annually or following any substantial change in site operations.

Other activities which may prompt review of the Management System are variations to the environmental permit, accident, complaint, breach or a change in the site setting or sensitive receptors.

Where the review results in required changes, this will be documented and maintained with the site records, for example, changes to environmental management measures, new or altered equipment.

19 SITE CLOSURE

During the lifetime of DCS operation of the permitted site they will maintain records. This will include information regarding any environmental incidents, improvements or changes to containment or abatement features, records of monitoring events, or any other details which may have impact on the site's condition.

This information will be used to support a permit surrender application when the site operations cease.

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Suite 11 Manor Mews, Bridge Street, St Ives, PE27 5UW
01480 462 232 | www.wiserenvironment.co.uk | info@wisergroup.co.uk