

Harlestone Inert Landfill

784-B043007

Operating Techniques

Environmental Permit Application

Mick George Limited

May 2024

**Document prepared on behalf of Tetra Tech Limited. Registered in England number:
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1.0 INTRODUCTION

1.1 REPORT CONTEXT

- 1.1.1 This document has been prepared by Tetra Tech on behalf of the Operator, Mick George Limited (Mick George) to support an environmental permit application for Harlestone Quarry (the site), Harlestone Rd, Northampton, NN7 4EW. The environmental permit boundary is shown on Drawing Number H40/2/22/02.
- 1.1.2 To facilitate the restoration of the site as proposed under a planning application, Mick George are seeking to gain a bespoke waste disposal permit for the permanent deposit of inert waste at the site. This activity would facilitate the infilling and restoration of the quarry void that will be created following mineral extraction activities at the site. The restoration comprise of will reinstating the agricultural land to its previous status and aim to increase the natural value of the local environment.
- 1.1.3 As such, this document has been prepared to specifically detail the operating and management procedures for the proposed waste activity.

2.0 OPERATING PROCEDURES

2.1 PERMITTED ACTIVITIES

- 2.1.1 The proposal comprises the importation of inert waste for infilling of the quarry void that would be created following mineral extraction activities at the site. The works would be completed in accordance with the proposed restoration plan (Drawing Number H40/2/22/04) that was submitted as part of a planning application to Northamptonshire County Council (NCC).
- 2.1.2 It is considered that the proposed activities at the site would fall under the following Recovery and Disposal codes shown in Table 1, provided for in Annex II to Directive 2008/98/EC of the European Parliament and The Council of 19th November 2008 Waste.

Table 1: Proposed R/D Codes

R/D Code	Activity Description
D1	Deposit into or on to land (e.g., landfill, etc.)

2.2 OPERATING HOURS

- 2.2.1 It is proposed that site operations would be limited to the following hours:
- Monday – Friday: 07:00 – 18:00
 - Saturday: 07:00 – 13:00
- 2.2.2 No operations will be undertaken on Sundays or Bank/Public Holidays.
- 2.2.3 HGV's will only depart the site during the following hours:
- Monday – Friday: From 06:00

2.3 WASTE TYPES

- 2.3.1 Waste is defined as 'Any substance or object the holder discards, intends to discard or is required to discard' under the Waste Framework Directive (European Directive 2008/98/EC), which repeals the European Directive 75/442/EC as amended.
- 2.3.2 Permitted wastes accepted at the site will be strictly inert as classified under the Landfill Directive (1999/31/EC) and Council Decision (2003/33/EC) of 19th December 2002 'establishing criteria and procedures for the acceptance of waste landfills'.
- 2.3.3 Inert waste is defined in Article 2 of the Landfill Directive 1999/31/EC as follows:-
- 'Inert waste' means waste that does not undergo any significant physical, chemical or biological transformations. Inert waste will not dissolve, burn or otherwise physically or chemically react, biodegrade or adversely affect other matter with which it comes into contact in a way likely to give rise to environmental pollution or harm to human health. The total leachability and pollutant content and the ecotoxicity of its leachate are insignificant and, in particular, do not endanger the quality of any surface water and/or groundwater.*
- 2.3.4 Table 2 lists those wastes that may be accepted at the site which do not require Waste Acceptance Criteria (WAC) testing under Council Decision (2003/33/EC), provided that they are inert and from a single source only (mixed loads from more than one site cannot be accepted without testing).'

Table 2: Proposed Waste Types that do not require Testing

EWG Code	Description
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOILS FROM CONTAMINATED SITES)
17 01	Concrete, Bricks, Tiles And Ceramics
17 01 01*	Concrete
17 01 02*	Bricks
17 01 03*	Tiles And Ceramics
17 01 07*	Mixtures Of Concrete, Bricks, Tiles And Ceramics Other Than Those Mentioned In 17 01 06
17 05	Soil (Including Excavated Soil From Contaminated Sites) Soil And Dredging Spoil
17 05 04	Soil And Stones Other Than Those Mentioned In 17 05 03
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES INCLUDING SEPARATELY COLLECTED FRACTIONS)
20 02	Garden And Park Wastes
20 02 02	Soil And Stones

*Selected construction and demolition waste with low contents of other types of materials (like metals, plastic, soil, organics, wood, rubber etc). The origin of the waste must be known.

- No C&D waste from construction, polluted with inorganic or organic dangerous substances e.g. because of production processes in the construction, soil pollution, storage and usage of pesticides or other dangerous substances etc., unless it is made clear that the demolished construction was not significantly polluted.

- No C&D waste from constructions treated, covered or painted with materials, containing dangerous substances in significant amounts.

- The origin of the wastes must be known and they will have low contents (<5% by mass per load of other types of materials (like metals, plastics, soil, organics, wood, rubber, etc).

- 2.3.5 In addition to the wastes that are listed in Table 2, Mick George propose to accept the waste codes listed in Table 3 below and will be subject to WAC testing as detailed in Section 2.5.

Table 3: Proposed Waste Types that will Require WAC Testing

EWG Code	Description
01	WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS
01 04	Wastes From Physical And Chemical Processing Of Non-Metalliferous Minerals
01 04 08	Waste Gravel And Crushed Rocks Other Than Those Mentioned In 01 04 07
01 04 09	Waste Sand And Clays
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION / INDUSTRIAL WASTE
19 12	Wastes From The Mechanical Treatment Of Wastes
19 12 09	Minerals (For Example Sand, Stones)

2.4 WASTE QUANTITIES

- 2.4.1 A volume of 530,000m³ cubic metres of imported material (or 848,000 tonnes using a conversion factor of 1.6m³/tonne) is required to restore the site and it is proposed that up to 250,000 tonnes of material would be brought to the site each year over a course of 4 years.

2.5 WASTE ACCEPTANCE PROCEDURES

- 2.5.1 Wastes would only be accepted onto the site if they comply with the list of wastes included in the permit. All vehicles delivering waste would be licensed waste carriers and each delivery must be accompanied by a relevant Waste Transfer Note, consistent with fulfilling the company's responsibilities under the provisions of the Duty of Care.

Basic Characterisation (Level 1)

- 2.5.2 Basic characterisation would ensure that the waste is suitable for acceptance at the regulated facility. The information to be supplied at this stage includes:-

- Source and origin of the waste;
- Information on the process producing the waste;
- Appearance of the waste, e.g. physical form; and
- The List of Wastes (England) Regulations 2005 code.

- 2.5.3 The wastes listed in Table 2 may be accepted at the site without testing provided that there is confirmation that they are single stream loads from known reliable sources and that they are accompanied by the required information. Wastes which are required to be tested will be assessed by the waste producer in line with the WAC limits for inert waste as detailed in Table 4. In addition, the leaching limit values for organic parameters specified in Table 5 will be applied.

- 2.5.4 Loads that contain wastes from multiple streams may be accepted together, provided they are from the same source, comply with the waste types specified in the permit and are accompanied by the required information.

Table 4: Waste Acceptance Criteria Thresholds For Inert Wastes That Require Testing

Determinand	Symbol	L/S = 10l/kg Mg/kg dry substance
Arsenic	As	0.5
Barium	Ba	20
Cadmium	Cd	0.04
Total Chromium	Cr total	0.5
Copper	Cu	2
Mercury	Hg	0.01
Molybdenum	Mo	0.5
Nickel	Ni	0.4
Lead	Pb	0.5
Antimony	Sb	0.06
Selenium	Se	0.1
Zinc	Zn	4
Chloride	Cl-	800
Fluoride	F-	10
Sulphate(a)	SO ₄ ²⁻	1,000
Phenol index	PI	1
Dissolved Organic Carbon(b)	DO	500
Total Dissolved Solids	TDS	4,000

- (a) The limit value for sulphate may be increased to 6,000 mg/kg, provided that the value of C0 (the first eluate of a percolation test at L/S = 0.1 l/kg) does not exceed 1,500 mg/l. It will be necessary to use a percolation test to determine the limit value at L/S = 0.1 l/kg under initial equilibrium conditions.
- (b) If the waste does not meet this value for Dissolved Organic Carbon (DOC) at its own pH value, it may alternatively be tested at L/S = 10 l/kg and a pH between 7.5 and 8.0. The waste may be considered as complying with the acceptance criteria for DOC, if the result of this determination does not exceed 500 mg/kg.
- (c) The value for Total Dissolved Solids can be used alternatively to the values for Sulphate and Chloride.

Table 5: Additional Waste Acceptance Criteria Thresholds (Organic Parameters)

Parameter	Value mg/kg
Total Organic Carbon (TOC)(a)	30,000
BTEX compounds (benzene, toluene, ethyl benzene & xylenes)	6
Polychlorinated biphenyls (PCBs) (7 congeners)	1
Mineral oil (C10 to C40)	500
PAHs (polycyclic aromatic hydrocarbons)	100

(a) In the case of soils, a higher limit value may be permitted provided a Dissolved Organic Carbon value of 500 mg/kg is achieved at L/S 10 l/kg at the pH of the soil or at a pH value of between 7.5 and 8.0.

On Site Verification

- 2.5.5 Each load of waste delivered to the site shall be, where possible, visually inspected before unloading by the weighbridge operator to confirm the material matches the description on the Waste Transfer note. Each load would be inspected after unloading. These inspections would ensure that the waste conforms to the description compiled as part of the basic characterisation.
- 2.5.6 If there is uncertainty regarding the acceptance of wastes at the site, testing may be required. No wastes would be accepted onto the site if there is uncertainty as to its source, conformance with the conditions in the environmental permit and/or its suitability for the intended use.
- 2.5.7 All site staff would be made aware of the waste acceptance procedures and would be trained in the procedures with dealing with non-conformances. The Site Manager would be responsible for ensuring that the procedures are implemented appropriately.

2.6 UNAUTHORISED AND REJECTED WASTES

- 2.6.1 Any loads or part loads identified as unacceptable upon discharge of the load shall be reloaded into the container and isolated whilst the Environment Agency (EA) are contacted by telephone. The most appropriate course of action shall then be agreed with the EA.
- 2.6.2 Any load or part load identified as unacceptable upon discharge of the load when the haulier has exited the site shall be isolated or quarantined on the site. The EA shall be kept informed of the subsequent course of action.
- 2.6.3 The following details of the rejected waste would be kept on site:-
- Time and date of incident;
 - Haulier and vehicle registration number;
 - Customer;
 - Waste type; and
 - Reason for rejection.

- 2.6.4 For small quantities of paper, plastic, wood and metal, a skip or similar container would be located near the operational area for the operator to dispose of such materials. The skip would be removed from site once full and taken to a permitted facility for disposal or recovery where appropriate.
- 2.6.5 Records would be kept of all rejected loads and these would be made available to the EA.

3.0 REGULATED FACILITY INFRASTRUCTURE

3.1 SITE ACCESS

- 3.1.1 Access to the site will be gained via an unnamed road off Harlestone Rd to the east of the site which is currently used to access the adjacent quarry.

3.2 WEIGHBRIDGE AND WHEEL CLEANING FACILITIES

- 3.2.1 The site will benefit from a wheel wash which will be used by HGVs before they leave the site. The wheel cleaning facility would be checked on a monthly basis and any necessary work would be carried out as soon as practicable. In the event of a breakdown with prolonged downtime, additional road cleaning equipment would be provided.
- 3.2.2 In addition, the site will benefit from a weighbridge which will be used to facilitate the site's waste acceptance procedures.

3.3 FUEL TANKS

- 3.3.1 Tanks for fuel, oil and lubricants would be provided on site, and they would be appropriately bunded (with 110% capacity). These would allow the quick and efficient fuelling and repair of the site machinery. All filling points, vents, gauges and sight glasses would be located on hardstanding within a bunded area.
- 3.3.2 The drainage system of the bund shall be sealed with no discharge to any watercourse, land or underground strata. Associated pipework shall be located above the ground and protected from accidental damage. All filling points and tank overflow pipe outlets shall be detailed to discharge downwards into the bund. The tanks would be maintained and inspected in accordance with the manufacturer's recommendations.

3.4 SECURITY

- 3.4.1 All vehicles delivering waste to the site would be required to report to the site office. Upon request, they may have to provide evidence of Registration as Waste Carriers. All other visitors to the site must sign the Visitors Book before proceeding onto the site and sign out prior to leaving.
- 3.4.2 A sign would be located at the site entrance detailing the name, address and telephone numbers of the permit holder, emergency contact numbers, site operating hours and the contact details of the EA. Any permanent changes to these details would be updated within 30 days. The sign would be located so that it does not encourage fly tipping and would be maintained in a satisfactory condition at all times. Signs would be erected on peripheral fences giving warnings of operations at the site.
- 3.4.3 A notice board would be maintained in the site reception area. A copy of the Environmental Permit and a copy of the company's 'Health and Safety Policy' would be displayed, together with any other relevant notices. A copy of all documents accompanying this application, detailing all site procedures would be kept in the site office.
- 3.4.4 The site would be secured from the public highway by substantial lockable gates at the site entrance and all reasonable precautions would be taken to prevent the unauthorised entry of the general public and the unauthorised depositing of wastes. Lighting would be installed around the refuelling and weighbridge areas which are to be intruder activated.

4.0 EMISSIONS

4.1 POINT SOURCE EMISSIONS TO AIR

- 4.1.1 There would be no point source emissions to air as a result of this application.

4.2 POINT SOURCE EMISSIONS TO GROUNDWATER

- 4.2.1 There would be no point source emissions to groundwater as a result of this application.

4.3 POINT SOURCE EMISSIONS TO SURFACE WATER AND SEWERS

- 4.3.1 There would be no point source emissions to surface water or sewer as a result of this application.

4.4 FUGITIVE EMISSIONS

- 4.4.1 Fugitive emissions have been identified as a potential environmental risk resulting from the proposal, as detailed in the Environmental Risk Assessment that accompanies this application as Appendix D.

5.0 ACCIDENT MANAGEMENT

- 5.1 All necessary measures would be taken to prevent the occurrence of accidents. The types of accidents and the potential environmental consequences associated with them have been identified in the Environmental Risk Assessment that accompanies this application.
- 5.2 It is considered that the most significant risk associated with the site is the unauthorised acceptance of non-compliant waste types. The waste acceptance procedures listed in Section 2 of this document aim to control and minimise this risk.

5.2 FIRE CONTROL

- 5.2.1 The acceptance of inert waste is considered unlikely to cause a fire due to the nature of the waste material. However, the operation and/or maintenance of mobile plant do pose a potential fire hazard, if precautions are not taken.
- 5.2.2 Firefighting equipment of a suitable type shall be kept at appropriate locations as advised by the Health and Safety Manager or the local Fire Service. All firefighting equipment shall be kept in good condition, unobstructed and be serviced at least once a year by a competent person. The site would be designated as a “no smoking area” and signed accordingly.
- 5.2.3 Any fire on the site would be treated as an emergency and would be extinguished at the earliest opportunity. If necessary, the Fire Service would be summoned. Any incidents of fire would be reported to the EA and recorded in the Site Diary

5.3 SPILLAGE PROCEDURE

- 5.3.1 Material accepted at the site would be inert. The most likely source for spillages would be from fuel tanks or spillages of fuel or oil associated with plant and machinery.
- 5.3.2 In the event of a spillage of fuel/oil from site machinery or vehicles, the following procedures would be implemented:-
- Clear the area straight away;
 - Lay absorbent granules over the spill to soak up the spillage;
 - Use Personal Protective Equipment (PPE) provided on site if required;
 - Once the liquid has all been absorbed use a shovel to clear up the waste, put it in a plastic sack and then place it in the container for non-compliant waste for disposal at a suitably permitted facility; and
 - A record of the spill incident and remedial action taken would be recorded in the Site Diary.
- 5.3.3 Spillage kits would be maintained on site in order to respond to any spillage incident. The spillage kits would be kept securely in the site office.

6.0 SITE MANAGEMENT

6.1 TECHNICAL COMPETENCE

- 6.1.1 The site would be supervised by an individual who possesses the required level of technical competence. A copy of the Certificate of Technical Competence (COTC) is provided as Appendix A.

6.2 MANAGEMENT SYSTEM

- 6.2.1 The operator, Mick George, has a certified Environmental Management System (EMS) in place which is compliant with the requirements of ISO 14001. A copy of the company's ISO 14001 Certificate is provided as Appendix B of this document and a summary of the EMS contents is provided as Appendix C. The operator may update their EMS procedures from time to time to reflect working practice which would take precedent over the details contained herein.
- 6.2.2 All site operatives would be adequately trained in health, safety and environmental issues. Staff would only be permitted to undertake activities that they have been trained for. They would be made aware of the procedures they must follow in the event of an accident or incident and would be able to access any relevant documentation that they may require. All training, experience and qualifications of staff would be noted and these records would be maintained and kept up to date.

7.0 MANAGEMENT OF DOCUMENTATION

7.1 RECORD KEEPING

- 7.1.1 Mick George have a Management System which is compliant with ISO 14001 and this includes procedures for the management of documentation.
- 7.1.2 A record would be kept that provides details on all wastes deposited at the site. This would include details on waste types, quantities and the date of deposition. This would be provided to the EA at three-monthly intervals, within one month of the end of each period. A record of basic waste characterisation and any compliance testing or on-site verification would be maintained in the site office.
- 7.1.3 A site diary would be kept in the site office, and this would be updated daily. The diary would be used to record any accidents, incidents or complaints. This would provide an ongoing record throughout the period of operation at the site, and this would enable any investigative or corrective action that may be required.
- 7.1.4 The Environmental Permit and other documents containing information regarding the operation of the site would be kept in a convenient location, allowing access for any person that may be working at or visiting the site.

7.2 MAINTENANCE OF RECORDS

- 7.2.1 The site diary would be maintained and updated to include the following:-
- The name of the technically competent person in attendance;
 - Weather conditions; Details of all visitors, including their status and times of arrival and departure;
 - Details of maintenance, modification, repair, replacement, delivery and return, and breakdown of any plant and machinery;
 - Damage to vehicles, fences, gates, etc. and incidents of trespass; and
 - Details of any complaints or environmental/health and safety incident.

8.0 INCIDENTS AND NON-CONFORMANCES

- 8.1 Mick George has procedures for investigating and recording any incidents and non-conformances at the site, and for taking any corrective action. Mick George have an EMS which is compliant with ISO 14001 and this includes procedures for handling incidents and non-conformances.
- 8.2 The following types of incidents would require investigation:-
- Malfunction, breakdown or failure of plant and equipment;
 - Deviation from site procedures and operating techniques;
 - Near misses; and
 - Complaints from external parties.
- 8.3 All staff would be trained to detect and report any such occurrences. Procedures would be taken to allow operations to resume and preventative measures may be put in place to ensure that the incident does not reoccur.

DRAWINGS

H40/2/22/02- Environmental Permit Boundary

H40/2/22/04 - Restoration Plan

APPENDIX A – CERTIFICATES OF TECHNICAL COMPETENCE

Continuing Competence Certificate

This certificate confirms that

Mark Deadman

Has met the relevant requirements of the Continuing Competence scheme for the following award(s) which will remain current for two years from 27/03/2023

LIN

Landfill - Inert Waste

Expiry Date:
27/03/2025

Verification date: 21/03/2023

Authorised:



Professional Services Director

Learner ID: 24883

Certificate No.: 5221858

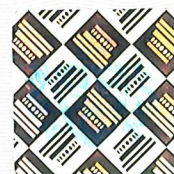
Date of Issue: 27/03/2023



CIWM Chief Executive Officer



The Chartered Institution
of Wastes Management



APPENDIX B – ISO 14001 CERTIFICATE

Certificate of Registration

This is to certify that the Environmental Management System of
**Mick George Group (comprising Mick George Ltd, MG Recycling Ltd,
Mick George Earthworks Ltd, Mick George Environmental Ltd and
Mick George Concrete Ltd)**

6 Lancaster Way, Ermine Business Park, Huntingdon, Cambridgeshire, PE29 6XU

has been assessed by The Certification Group for conformance to the
requirements of:

BS EN ISO 14001:2015

Scope of Registration

**Contracting (including civil engineering, groundworks, demolition
and asbestos management), Quarrying and Aggregate Production,
Waste Management, Recycling and Ready- Mix Concrete production**

Signed on Behalf of The Certification Group

Certification Manager: Elaine Hanaghan

Registration No	2100491
Initial Certification Date	12/07/2016
Certificate Issue Date	14/06/2022
Certificate Expiry Date	30/11/2022
Issue No	13



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APPENDIX C – ENVIRONMENTAL MANAGEMENT SYSTEMS SUMMARY

Harlestone Inert Landfill – Management Systems Summary

1.0 SITE PLAN

- 1.0.1 The management system will include a working plan draw to scale, which details the phasing of the proposed operations and the layout of the site. This drawing will also include:-
- Site access;
 - Location of site infrastructure;
 - Location of screening and storage mound (topsoil and subsoil); and
 - Locations of acoustic screening and hedge planting.
- 1.0.2 In addition to the site's layout and infrastructure, there will also be a plan which identifies the location of any receptors that may be vulnerable to pollution as a result of the site's operations. This plan will be considered in connection to the Accident Prevention and Management Plan.
- 1.0.3 In accordance with Section 6 (Review of Management System), the site plan will be reviewed and may be amended if there are any changes to site operations that may affect the layout of the site. The plan may also be updated if there are any changes to nearby receptors.

2.0 SITE INFRASTRUCTURE AND OPERATIONS

2.1 Site Operations

- 2.1.1 The management system will comprise documented procedures for all site operations in relation to start-up, normal operation and shut down. These procedures will also provide details of what measures will be undertaken in order to prevent or minimise the environmental risk from site operations. -
- 2.1.2 The procedures will be reviewed and may be amended under the following scenarios:-
- Periodic review (in accordance with Section 6) identifies an improved method of operation. The revised procedure will have a reduced or unchanged risk of impact upon safety, health and environment;
 - A need to amend procedures is identified following a near miss investigation;
 - A need to amend procedures is identified following an incident investigation; and
 - Legislative requirements change resulting in a need to alter procedures.

2.2 Site Equipment and Maintenance Plan

- 2.2.1 A Planned Preventative Maintenance programme (PPM) will be incorporated into the site's management system to minimise the risk to safety, health and the environment by ensuring that all appropriate items and elements within the site are served and inspected on a regular basis or to the manufacturer's maintenance schedules.
- 2.2.2 Details of faults, breakdowns and repairs will be documents and records will be maintained by the operator. Faults and breakdowns will be investigated, and the service schedule will be revised if necessary.

2.3 Contingency Plans

- 2.3.1 All operational procedures will comprise contingency plans which details what actions will be undertaken in the event of any breakdown, enforced shutdowns and any changes to normal operations (e.g. flooding or extreme weather). This will ensure that the necessary measures are employed to minimise the environmental risks arising from abnormal operating conditions.

3.0 ACCIDENT PREVENTION AND MANAGEMENT PLAN

- 3.0.1 The Accident Prevention and Management Plan will identify potential accidents that could arise from the site's operations, and the environmental consequences of those accidents. It will also provide details on how the operator will reduce the likelihood of accidents and indicates how the operator will respond should any such events occur.
- 3.0.2 The Accident Prevention and Management Plan will also include procedures to detail how incidents are recorded, investigated and responded to with corrective action. Also, in accordance with Section 4 (Keeping Records), Mick George will maintain a record of all incidents, how the incident was investigated and any actions that were undertaken as a result of the incident.
- 3.0.3 The Accident Prevention and Management Plan will be reviewed on an annual basis and under the following circumstances:-
- Periodic review identifies an improved method of operation. The revised procedure will have a reduced or unchanged risk of impact upon safety, health and environment;
 - A need to amend procedures is identified following a near miss investigation;
 - A need to amend procedures is identified following an incident investigation;
 - A need to amend procedures is identified following a justified complaint investigation;
 - Legislative requirements change resulting in a need to alter procedures; and
 - Changes to emergency contacts.

3.1 Contact Information for the Public

- 3.1.1 Given that the proposed facility comprises a waste operation, a notice board will be situated at the site entrance which will include the following information:-
- The permit holder's name;
 - An emergency contact name and telephone number;
 - A statement that the site is permitted by the Environment Agency;
 - The permit number; and
 - Environment Agency telephone number 03708 506506 and the incident hotline 0800 807060.

3.2 A Changing Climate

- 3.2.1 As part of the review process (Section 6), Mick George will consider whether the site's operations could be affected by a changing climate which may include the delivery of the site's Accident Prevention and Management Plan and Contingency Plans.

3.3 Complaints Procedure

- 3.3.1 A complaints procedure will be incorporated in to the site's management system to ensure that complaints will be handled by the operator to reassure the Environment Agency and the public that any of their concerns will be acknowledged and acted upon where appropriate. The procedure will be reviewed on an annual basis as part of the management system review (Section 6) or in the event of any significant complaints.
- 3.3.2 As mentioned in Section 3.1, a notice board will be situated at the site entrance which details the operator's and the Environment Agency's contact details. This will ensure that any member of the public can report their complaint and be confident that it will be received by the appropriate party even if they do not wish to discuss their complaint directly with the operator.
- 3.3.3 Any complaint that is received by the operator will be investigated in order to identify the cause of the complaint. Once established, necessary actions will be undertaken to prevent re-occurrence.
- 3.3.4 The operator will maintain a record of all complaints, how the complaint was investigated and any actions that were undertaken as a result of the complaint.

4.0 MANAGING STAFF COMPETENCE AND TRAINING RECORDS

- 4.0.1 To ensure that the site is operated by personnel who are suitably trained, the operator will maintain a record which identifies each job role and the training requirements for each role. This will be monitored against a training checklist which will identify whether each member of staff has received the required training to undertake their role on site.
- 4.0.2 The operator will also maintain a record of all training, experience and qualifications of staff and kept will be kept up to date.
- 4.0.3 The training requirements and training checklist for all personnel will be reviewed on annual basis as part of the management system review (Section 6) and in the event of any significant alterations to the site operations or procedures.

5.0 KEEPING RECORDS

- 5.0.1 The operator will maintain a record of documents containing information regarding the operation of the site. This will include the following:-
- Environmental permits and variation notices issued to the site;
 - Legal requirements;
 - Risk assessment for site operations;
 - Any plans that are required by the Environmental Permit;
 - Operating procedures;
 - Staff competence and training;
 - Compliance checks, findings of investigation and actions taken;
 - Complaints made, findings of investigation and actions taken;

- Audits of management system, findings and actions taken;
- Management reviews and changes made to the management system;

5.0.2 These documents will be kept in a convenient location on site, allowing access for any person that may be working or visiting the site.

5.1 Waste Records

5.1.1 The operator will keep a record that details all wastes that are deposited on site. This will include the following details:-

- The quantity of waste to be imported;
- The List of Wastes (England) Regulations 2005 code;
- Original source of the waste;
- The identity of the waste producer;
- The date the waste arrives on site;
- Any non-compliant materials that were received on site and what was done to the material; and
- Results of basic waste characterisation, compliance testing or on-site verification.

5.1.2 The information listed above will be provided to the Environment Agency at three-monthly intervals, within one months of the end of each period.

6.0 REVIEW OF MANAGEMENT SYSTEM

6.1 Documentation Review Procedures

6.1.1 The management system will be reviewed on an annual basis to ensure compliance with the relevant guidance and regulations. The management system will also be reviewed under the following circumstances:-

- After any accident, complaint or breach of the Environmental Permit;
- Changes to the site or operations that will require the Environmental Permit to be varied (changed);
- If a new environmental problem or issue is encountered on site and a new control measure has been implemented;

6.1.2 The operator will maintain a record of any changes to the management system.

7.0 SITE CLOSURE

7.0.1 The post closure controls will ensure long-term management and monitoring of the regulated facility.

7.0.2 The Environmental Management and Monitoring Plan (Appendix H of the Environmental Permit Application) provides details regarding the monitoring schedule of the aftercare phase.

7.0.3 The Closure and Aftercare Plan (Appendix I of the Environmental Permit Application) provides details of the measures to be taken upon and after the closure of the landfill to avoid pollution risk.