



Think 3e Consortium Limited Environmental Management System

**Think 3e House,
15-21 Links Road
Finedon Road Industrial Estate
Wellingborough
Northamptonshire
NN8 4EY
EPR/BB3404KM/V002**



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Issue and Revision Record

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1.0 Site Introduction

This Management System has been prepared to identify and minimise the risk of pollution, including those arising from operations, maintenance, accidents, incidents, nonconformances, closure and those drawn to the attention of the operator/site management as a result of complaints; and carried out under the environmental permit issued to the company.

Operator: Mr Matthew Baldry and Mr Marcus Baldry.

Facility: Think3e Consortium Limited

Operated and permitted at: Think 3e House, 15-21 Links Road, Finedon Road Industrial Estate, Wellingborough, Northamptonshire, NN8 4EY.

Permit reference: BB3404KM/V002

Waste returns reference: EAWML 101445

The company operate a Waste Transfer Facility, predominantly the acceptance of material arising from commercial properties.

1.1 Site Location

The site is located at Think 3e House, 15-21 Links Road, Finedon Road Industrial Estate, Wellingborough, Northamptonshire, NN8 4EY.

The national grid reference for the site is SP 90221 69692.

The site lies within an industrial estate, bounded by commercial and industrial businesses. The nearest residential properties are located approximately 603m to the southwest of the site.

1.2 Site Permit

The permit, EPR/BB3404KM/V002, A9: Special Waste Transfer Station. The permit was issued on the 30/06/2010.

1.3 Drawings

The site permitted boundary is shown within the permit.

Drawing 003 Site Layout Plan

Drawing 004 Site Receptor Plan

Drawing 005 Site Drainage Layout Plan

Drawing 006 External Hydrant Plan

1.4 Site Activities

Permitted waste management activities are listed within the permit.

The following activities are authorised on site;

- D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)
- R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)
- D14: Repackaging prior to submission to any of the operations numbered D1 to 13
- D9: Physico-chemical treatment not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12
- 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
- R5: Recycling/reclamation of other inorganic compounds

The annual permitted tonnage will be 50,000 tonnes.

1.4.1 Water, Gas, and Electricity

There is no gas supply within the permitted area. There is water supply within the buildings as shown in drawing 003.

1.5 Permitted Wastes

The site will accept waste listed in Table 2.2 of the permit.

1.6 Site Layout and Drainage

The Site Layout Plan is shown on drawing 003.

The site office is located within the permitted area.

Surface, foul and interceptors are shown on drawing 005.

All site surfaces used for waste storage are made up of concrete and are impermeable.

1.7 Hours of Operation

The site operates 24 hours a day 365 days per year.

1.8 Site Notice Board

A notice board will be erected at the site entrance, displaying the following information:

- The site name and address;

- The name of the permit holder and operator;
- The Environmental Permit number and accompanying statement stating that the site is permitted by the Environment Agency.;
- Environment Agency contact details, Emergency No. 0800 80 70 60, and General Enquires No. 03708 506 506;
- Operating hours.

Additional signs are displayed around the site for operational and health & safety purposes. All staff and visitors will be required to comply with the requirements of all signs whilst on site.

1.9 Staff and Site Management

The table below details the minimum number of staff when the site is operational for the reception and processing of waste.

Position	Employees	Responsibilities
TCM/Site Manger	1	Ensuring the site is being operated in accordance with Environmental Permit
Site operatives	15	Waste handling/processing, reception.
Plant Operators	7	Waste handling/processing, reception, operating and maintaining plant.
Supervisors	2	Waste handling/processing, reception.
Team leaders	3	Waste handling/processing, reception.

1.10 Staff Training

Staff and temporary staff employed will receive appropriate training to enable them to carry out their role safely and effectively, also to allow the site to be operated within the current legislation and guidelines and also to ensure company procedures are followed.

Records of training will be kept and updated accordingly.

Operations at the site will be under the overall control of a technically competent person who holds the relevant Certificate of Technical Competence (COTC) under the Waste Management Industry Training and Advisory Board (WAMITAB) scheme.

1.11 Document Control

This document is considered to be a 'working' document that will be reviewed and updated annually (if required) or as required should any of the following occur:

- the results of any testing of this document indicate that changes are required;
- a change or review of legislation;

- a change in site operations; or
- if the site is instructed to do so by the EA.

1.12 Reporting

Within one month of the end of each quarter, the operator shall submit to the Environment Agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

1.13 Notifications

The Environment Agency shall be notified without delay following the detection of:

- (a) any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution;
- (b) the breach of a limit specified in these standard rules; or
- (c) any significant adverse environmental effects.

Written confirmation of actual or potential pollution incidents and breaches of emission limits shall be submitted within 24 hours.

Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.

2.0 Site and Emergency Contacts

Name	Contact
Fire Service Emergency	999
Fire Service (Local)	01604 797000
Police Emergency	999
Police (Local)	03000 111 222
Anglian Water	03457 145 145
Environment Agency	0800 80 70 60
North Northamptonshire Council	0300 126 3000
Health and Safety Executive	0300 003 1747

Operators	07960 954308- Marcus Baldry 07919 414908- Matthew Baldry
ENVA	01505 321 000

3.0 Standard Operating Procedures

3.1 Emergency Procedures

An emergency is considered to be an event or incident that has, or has the potential to, cause immediate harm to the environment, employees, neighbours, on site property, neighbouring property, and/or result in a legal non-compliance that puts the company and its business at risk.

3.1.1 Fire

Any outbreak of fire at the site shall be treated as an emergency. In the event of fire, the following action will be taken:

- The fire brigade will be notified immediately, and the EA as soon as practicable;
- The burning area will be isolated, and attempts will be made to extinguish the fire utilising the on-site fire extinguishers, if safe to do so;
- Contaminated site runoff will be isolated and prevented from entering any unsurfaced ground; and
- The site will be evacuated if the fire is not containable.

The area of fire must be evacuated without generating panic. Site personnel must ensure that no persons or vehicles re-enter the affected area. The emergency meeting point is opposite the site entrance.

3.1.2 Flooding

The site is not located in a designated flood zone.

3.1.3 Severe accident or fatality

In the event of a severe accident or fatality, the ambulance service should be contacted immediately.

The site's designated first aider will employ emergency first aid as appropriate.

Where an accident results in a casualty requiring an individual to be taken to hospital, the Health and Safety Executive (HSE) will be notified as soon as practicable.

3.1.4 Major spillage

In the event of a major spillage which has the potential to cause pollution or off-site contamination, the Operator/Site Management will immediately contact the EA via the incident hotline (**0800 80 70 60**) and the emergency services. Any staff or visitors will follow instructions and take appropriate actions taking into consideration the risks associated with the spilt substance.

If appropriate and safe to do so, action will be taken to prevent the transmission of the substance(s).

3.1.5 Communication

In the event of an emergency, the occupants of neighbouring properties will be contacted and advised of the incident, its severity and contingency arrangements that may include evacuation.

In all cases after an event, an **Accident, and Incident Record** (5) is completed. An investigation may be carried out by the Operator/Site management or other designated person. The incident will be reported to the relevant authorities including:

- Environment Agency
- Health & Safety Executive
- Anglian Water

3.1.6 Training

Suitable and sufficient training and information shall be provided to all relevant employees in order that they are aware of their duties in an emergency situation. Such training shall be recorded and update

d as required in the Training Matrix or physical records held in the site office.

3.1.7 Testing and Reporting

Records shall be kept of maintenance and testing of safety equipment.

Evacuation drills and mock spill incidents and accidents shall be staged at six monthly intervals. The Operator/Site Management shall maintain a record of these.

3.2 Waste Acceptance

The following procedures outline the pre-acceptance and acceptance measures that will be followed at all times.

Waste shall only be accepted.

- (a) it is of a type listed within the permit;
- (b) it conforms to the description in the documentation supplied by the producer and holder;
- (c) it is visually inspected on arrival and before it enters the treatment process to ensure that it complies with the permit.

Records demonstrating compliance for the acceptance of permitted wastes (including analysis and assessment of any excavated/inert wastes from potentially contaminated sites) shall be maintained.

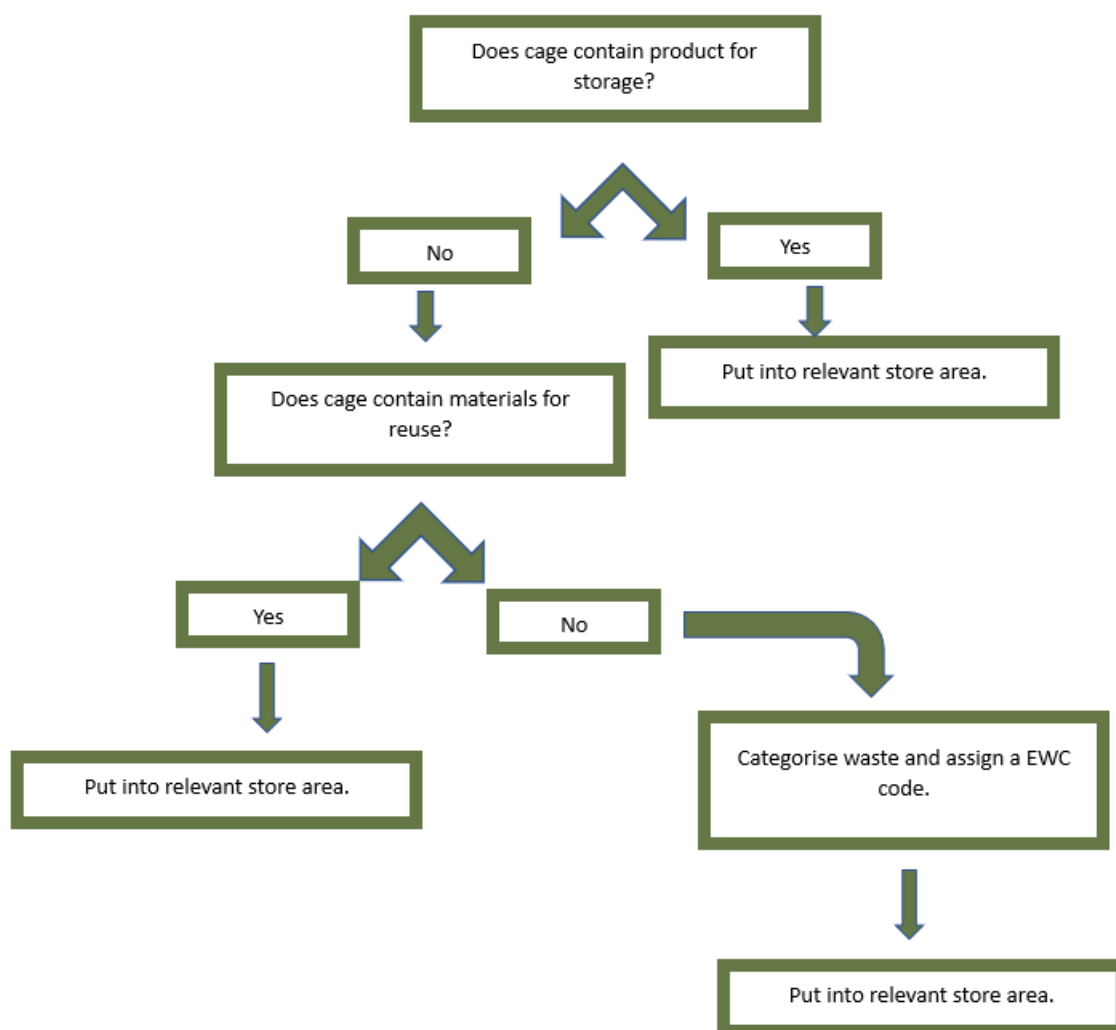
3.2.1 Pre-acceptance procedures to assess material

Materials brought to site are collected company vehicles only.

Pre acceptance is carried out by the company when initially booking in, incoming loads with the customer.

The customer will be informed of the site acceptance rules including the list of non-permitted wastes.

Site use the decision tree to determine product, reuse or waste as shown below.



In the event of third parties are delivering or removing waste from the site, the site manager/TCM will undertake a check of the relevant waste carrier's licence in place by verifying the waste carriers licence document.

Should there be the need to conduct further verification the licence can be checked to ensure that the vehicle is properly licensed by using one of the following methods:

- Contacting the Environment Agency on 08708 506 506 to request an instant Waste Carrier Validation Check; or
- Online on the Environment Agency's waste carrier register at: <http://www.environment-agency.gov.uk/epr/search.asp?type=register>.

If vehicles are arriving from the same company/under same contract the Waste Carrier Licence may cover all vehicles.

3.2.2 Waste Transfer Note

All deliveries to site are pre booked due to the nature of the business and in relation to capacity on site. A transfer note accompanies all incoming loads to site.

In the event of third parties delivering waste to site a transfer note is required to accompany incoming wastes.

Waste will be described in the waste transfer note with reference to the European Waste Catalogue (EWC) Codes with the appropriate code number. A copy of the list of wastes that can be accepted on site can be found in the site's environmental permit. The Site Manager and site operatives will be trained to identify a correctly completed waste transfer note.

Upon the receipt will check that the waste transfer note includes signed confirmations that the waste hierarchy has been applied correctly under the Environmental Permitting (England and Wales) Regulations 2010 (as amended). The waste hierarchy illustrates the most and least favoured options of disposal (1 being the most favoured):

1. Prevention;
2. Minimisation;
3. Reuse;
4. Recycling;
5. Recovery/energy recovery; and
6. Disposal.

All waste transfer notes will be kept for no less than 3 years.

3.2.3 Waste Acceptance Procedure

The following steps will be followed for all incoming wastes from customers. The Site Manager/TCM and any site operatives will be trained to understand and implement the following waste acceptance procedures:

- The site uses a weighbridge to weigh and record the weights of materials if required.
- Waste will arrive on site with the relevant paperwork (waste transfer note and any sampling schedules/results) for initial checks. Any discrepancies will be resolved before the waste is officially accepted on-site. The Site Manager will ensure that no non-conforming waste is accepted for processing.
- Upon arrival on site the load will be further inspected and validated against the waste transfer note. One copy will be held on-site and if an external customer the other given to the driver of the vehicle.
- A visual inspection will be taken to ensure consistency with the waste transfer note.
- Checks on storage capacity are made daily to ensure that suitable space is available for any incoming wastes.
- Wastes will be tipped within the relevant area building/canopy/stockpile, the waste will be subject to visual inspection by site staff. In the event that any non-permitted waste is observed, it will be removed and moved to the quarantine area.

If the load is rejected, the waste transfer note will be completed with the reason for rejection, and the vehicle directed off site/or waste reloaded and taken back to the producer or to a suitably permitted facility.

3.2.4 Non-compliant waste

If waste is found to be non-compliant prior to being unloaded, the details will be recorded, and the vehicle/waste turned away. Should wastes be found to be non-compliant following receipt onto site, then the waste will be:

- reloaded on to the delivery vehicle for transport off-site to a suitably permitted facility; or
- removed to a designated quarantine skip/area, pending removal off-site to the producer or to a suitably permitted facility.

All records of non-compliant waste received at the site will include the following details:

- the quantity;

- reason for non-compliance;
- characteristics;
- origin;
- photographs;
- delivery date and time; and
- the identity of the producer and carrier.

This record will be made in the site diary and a Waste Rejection Record for significant loads will be completed.

3.3 Non-Conforming Waste Procedure

If waste is found to be non-conforming, the following procedure is to be followed;

1. Notify the relevant EA officer(s) of significant loads as soon as is practicable;
2. If the carrier's vehicle is still present, the waste should, wherever possible, be reloaded back onto the carrier's vehicle/ or refused and returned to the member of the public;
3. If the material is reloaded onto the carrier's vehicle: the office of the carrier should be notified by telephone; the details including time of call and contact name are to be recorded in the Site Diary (or other recording system); and a copy of the Waste Rejection Record is to be retained;
4. If the carrier or customer has departed the site, and if it is considered safe to do so, the waste is to be photographed where possible, placed in the quarantine area pending the outcome of further investigations;
5. If the waste is of unknown composition, it is to be isolated at the operational area pending further investigations. This is to be achieved by the placement of cones or other barriers around the waste;
6. Further investigations may include contact with the carrier/customer and the producer to seek to determine the likely composition of the waste. These investigations are to be undertaken by the Site Manager or other designated person;
7. If the waste is confirmed as not being permitted for recovery at the site, the waste is to be directed to an alternative, suitably licensed facility; and
8. Wherever possible, rejected waste is to be removed from the site within 24 hours of receipt at the site; however, identification of suitable disposal facilities may result in the waste being stored for a longer period prior to removal from the facility (e.g. contaminated soils/WEEE)

3.3.1 Waste Rejection Note

The Waste Rejection Record to be completed and cross referenced in the Site Diary. It should include the following details:

- Date and time;
- Producer/Customer details;
- Carrier/Customer details;
- Transfer note reference number;
- Description of waste;
- Volume of waste;
- Photographs of the waste;
- European Waste Catalogue (EWC) code;
- Non-conforming waste; and
- Actions agreed and taken.

3.4 Incoming Waste and Waste Storage

The permitted annual throughput is 50,000 tonnes.

Storage areas are to be regularly inspected and maintained, including site surfacing and stockpile management.

The waste transfer buildings/canopies and external stockpiles will include three bays for the use of acceptance and storage of waste as follows:

Waste Material	Location	Height (m)	Length	Width	Max Volume	Storage Time
Internal – Waste Transfer Building						
Shed 1 Plastic	Internal Waste Transfer building	4.5	8	11	595m ³	4-12 weeks
Shed 1 Cardboard/paper	Internal Waste Transfer building	4.5	8	11	595m ³	4-12 weeks
Shed 2 Plastic	Internal Waste Transfer building	4.5	8	11	396m ³	4- 12 weeks
Shed 2 Cardboard/paper	Internal Waste Transfer building	4.5	8	11	396m ³	4- 12 weeks
Shed 3 Food x 2	Internal Waste Transfer building	4.5	21	4	396m ³	4- 12 weeks
Shed 4 Food	Internal Waste Transfer building	4.5	21	4	396m ³	4- 12 weeks
Shed 6 Plastic	Internal	4.5	8	11	396m ³	4-12 weeks

	Waste Transfer building					
Shed 7 Plastic	Internal Waste Transfer building	4.5	8	11	396m ³	4-12 weeks
Shed 9 WEEE	Internal Waste Transfer building	4.5	11.5	11.5	595m ³	4-12 weeks
Shed 9 Overflow- dried food	Internal Waste Transfer building	4.5	11.5	11.5	360m ³	4-12 weeks
Shed 10 Plastic x 4	Internal Waste Transfer building	4.5	4	17	306m ³	4-12 weeks
Shed 11 Plastic x 2	Internal Waste Transfer building	4.5	10	11	495m ³	4-12 weeks
External – Waste Transfer Building Canopies						
May contain plastic, paper, cardboard, food waste	External under canopies	3	5	16	240m ³	4-12 weeks (24 hours wet food waste)
External – Containers						
Maximum 4 x 40-yard containers May contain either wood, DMR, general or scrap metal.	External	1.07	1.52	2.29	3.72m ³	Max 1 month
External – Stockpile						
Scrap Metal	External	5	10	10	500m ³	4-12 weeks

- The quarantine area is located externally as shown in drawing 003.

Daily inspections will ensure that:

- Wastes are stored and segregated in designated stockpiles and bays in line with the FPP shown below.
- Wastes and product stockpiles will be clearly signed and identifiable.
- The maximum height of each stockpile on site, will not exceed the specified heights detailed in the FPP.
- Waste will not be stored outside of the designated storage timescales within the FPP.
- Site capacity will be managed on a daily basis.
- Waste will be stored in line with the site layout plan, the site layout plan designates all storage areas.

Should storage areas on site reach capacity, no further waste shall be accepted, and waste diverted to a suitably permitted facility.

3.5 Waste Treatment

Wastes are subject to manual and mechanical treatment, with the segregation and separation of waste into designated storage areas.

3.6 Waste Outputs

Once waste sorting operations have been undertaken in a controlled manner, materials stored and bulked pending removal for further recovery.

3.6.1 Residual Waste

Following manual waste treatment, a fraction of general waste may be generated. This waste will be sent for further recovery also.

3.7 Site Security

The site benefits from

- 2.4m palisade security fencing;
- Gate house with barrier;
- Lockable site palisade entrance gates (2.4m);
- CCTV cameras;
- Inspection and maintenance procedures;
- Visitor sign in system; and
- Site operates 24 hours, 7 days a week, 365 days a year.

Access to the site is via one entrance/exit.

Visitors to T3E must sign in and out via the visitors register located in the site office.

The site security system CCTV cameras cover all external and internal operational areas on site. CCTV cameras cover all operational waste storage areas.

There is a member of senior management or staff on site at all times.

The CCTV cameras trigger an alert to the Operator and nominated personnel when movement identified. Staff will investigate site activity to either identify any false alarms or carry out further investigation.

3.8 Daily Site Inspections and Audits

The Site Manager/TCM or designated member of staff is to carry out a daily inspection the site, completing the Daily Site Inspection Sheet.

A walkaround of the site completing the required list of checks is carried out, answering yes or no as to whether the site is compliant or not. Any defects and remedial actions are also recorded when complete.

If there are any issues identified not in the scope of the inspection checklist, these comments will also be recorded in the site diary and addressed.

Quarterly health and safety and environmental audits are also carried out covering other site activities and controls.

3.9 Climate Change

Summer Daily Maximum Temperature

Risk - This may be around 7°C higher compared to average summer temperatures now.

Impact 1

There is a potential for increased waste reactions or fires on site in respect to the storage and treatment of packaging waste.

To manage this the below controls are in place:

- Packaging wastes are stored in protected areas in a building and under cover;
- there is suitable segregation and separation of wastes;
- there is a Fire Prevention Plan in place which covers all aspects of Fire Prevention on site; and
- CCTV cameras are in place to monitor stockpiles

Impact 2

Dry vegetation in and around railway siding presents an increased fire risk.

- No combustible waste storage within 6m of dry vegetation where any railway boundary features are in place.

Impact 3

There is a potential increase in high temperature expansion and stress of plant, pipework, and fittings.

- The site has a regular inspection and preventative maintenance of site, plant, and equipment.

Impact 4

There is a potential increased dust emissions from processing areas and site roads due to the nature of the waste activity.

Not applicable to site operations, however, the below procedures take place:

- The site has a housekeeping regime in place which includes regular site cleaning and use of dust suppression systems around the site.
- Daily site inspections are conducted to identify the risk of dust leaving site.

Impact 5

Stockpiled food and drink containers, food contaminated wastes and 'black bag' type wastes.

- Waste acceptance procedures are in place to prevent excessively odorous or insect-infested loads being deposited at the site.
- Housekeeping measures are in place to make sure waste is turned around rapidly, storage areas and bays are cleaned and washed down regularly.

Winter Daily Maximum Temperature

Risk - This could be 4°C more than the current average with the potential for more extreme temperatures, both warmer and colder than present.

Impact 1

Slightly higher winter maximums could generate regular odour complaints and pest infestations.

- Environmental Management System in place to minimise risk of odour and influx of pests.
- Waste acceptance procedures are in place to prevent excessively odorous or insect-infested loads being deposited at the site.
- Housekeeping measures in place to make waste is turned around rapidly, and that storage areas and bays are cleaned and washed down regularly.
- Pest Management Procedure in place minimising the risk of increased pests by utilising preventative and direct measures via a retained pest control company.

Impact 2

Lower winter temperatures could result in an increased risk of pipes (or similar) freezing.

- The site conducts regular inspection and preventative maintenance of site, plant, and equipment.

Daily Extreme Rainfall

Risk - Daily rainfall intensity could increase by up to 20% on today's values.

Impact 1

Potential for increased site surface water and flooding.

- A flood plan is under way as part of the site Planning Conditions.

Impact 2

There is potential for drainage systems and interceptors to be overwhelmed.

- suitable measures are in place for the management of anticipated surface water and flood waters with active weather monitoring and planning on place by site management.
- drainage systems are inspected and maintained weekly.
- external areas where wastes are handled or stored are provided with contained drainage.
- the site drainage systems have sufficient storage and treatment capacity with external contractors on standby to provide an emergency response to remove water from systems or around the site.

Average Winter Rainfall

Risk - Average winter rainfall may increase by over 40% on today's averages.

Impact 1

Potential for increased site surface water and flooding.

- A flood plan is under way as part of the site Planning Conditions.

Impact 2

Potential for drainage systems and interceptors to be overwhelmed.

- suitable measures are in place for the management of anticipated surface water and flood waters with active weather monitoring and planning on place by site management.
- drainage systems are inspected and maintained weekly.
- external areas where wastes are handled or stored are provided with contained drainage.
- the site drainage systems have sufficient storage and treatment capacity with external contactors on standby to provide an emergency response to remove water from systems or around the site.

Sea Level Rise

Risk - Sea level rise which could be as much as 0.6m higher compared to today's level.

Impact 1

If a site is located near the coast there is potential increased risk of flooding.

- Not applicable due to site location

Drier Summers

Risk - Summers could see potentially up to 40% less rain than now.

Impact 1

Potential increased use and reliance on mains water for dust suppression, cleaning and fire water.

- measures are in place to review and minimise water use
- mains water capacity is adequate, taking into account reduced availability of rainwater for activities such as dust suppression, cleaning and fighting fires

River Flow

Risk - The flow in the watercourses could be 50% more than now at its peak, and 80% less than now at its lowest.

Impact 1

Increased impact from on-site drainage systems where they are connected to watercourses.

- Not applicable to site drainage systems

Impact 2

Increased risk of water course flows being too high to allow discharge and drainage backs up on site.

- Not applicable to site drainage systems

3.10 Monitoring and Control

There are no listed point source emissions from the site therefore there are no conditions of the environmental permit that set specific emissions limits.

Should any such parameter be imposed in the future then this procedure would be reviewed and amended accordingly.

3.11 Traffic Management

Vehicle movements on site are currently limited to company vehicles only.

All vehicles must adhere to the site speed limit 5mph speed limit.

Drivers are responsible for ensuring that their vehicle is safely loaded. Unsafe loads will not be accepted at the site and will not be allowed to leave the site until they have been made safe.

Drivers waiting to tip at the facility shall follow the instructions of site management and shall only tip in the designated area, unless advised otherwise.

No tipping shall take place over sorted stockpiles. Vehicles on site tipping or loading will be supervised by the Site Manager/or site operative.

Drivers must remain in the cab or stand well clear of the vehicle during loading or tipping.

Once the vehicle has been loaded it must be securely sheeted or covered before leaving the site.

When sheeting and unsheeting the vehicle ensure that the engine is switched off, the ignition key removed, and the parking brake is on.

3.12 Noise Management and Minimisation

All waste management operations on-site shall be conducted so as to prevent or reduce noise nuisance off-site. Noise shall be limited to such levels that are unlikely to cause pollution of the environment or harm to health or serious detriment to the amenity of the locality outside the site boundary.

All site operations shall be conducted in such a manner that noise from such operations does not give rise to unacceptably high levels of noise.

The main sources of noise are as follows:

- Noise from vehicular movements (site access road and internal site movements);
- Crushing and screening activities;
- Dropping material from height and;
- Noise from operation of site plant including loading and unloading of materials.

It is considered that the generation of vibration as a result of operations at the site will not be significant.

The Site Manager and any staff employed at the site are trained in the need to minimise site noise and are responsible for monitoring and reporting excessive noise when carrying out their everyday roles.

3.12.1 Plant and Equipment

Where practicable, the selection and use of low-noise equipment or alternative working methods is to be adopted to minimise the generation of noise at source. Inspection and repairs are to be undertaken in accordance with the manufacturers' recommendations.

Noise control is to be implemented through one or more of the following procedures:

- Care is to be taken during the unloading and loading of materials. For example, minimise drop heights to prevent unnecessary noise creation.
- Daily checks are conducted with an auditory assessment made.
- Incoming wastes will be placed on the site surface not dropped from height.
- Site operations including treatment are restricted to hours specified in the planning consent.
- Timing of noisy works away from evenings and weekends.
- Follow site speed limits and ensure they are complied with by any vehicles using the site.
- Switch off plant and vehicles when not in use.

Plant is to be selected and operated to minimise noise. All site plant and machinery shall be operated and maintained in accordance with manufacturer's specifications. Site plant will be subject to a planned preventative maintenance schedule.

Auditory inspections shall be carried out in response to complaints.

A record of the inspection findings and any complaints are to be made in the Daily Inspection Sheet or Diary and on the Complaint Recording Form.

3.12.2 Monitoring

If a noise problem is noticed or a complaint is received, it will be immediately dealt with by the Site Manager. The source of the problem will then be investigated, and appropriate corrective action will be taken.

In the event that noise derived from the site is detected beyond the site boundary by the Site Manager which in their opinion could give rise to complaints, investigation action shall be taken without delay. The nature of

the investigation shall take into consideration weather conditions at the time and any operational issues together with the nature of the receptors. The following remedial action may be appropriate:

- Relocate plant and equipment to less sensitive locations;
- Minimising waste treatment operations;
- Undertake maintenance on equipment that will reduce noise levels;
- Modify plant to incorporate noise suppression equipment; and

Replace noisy plant and equipment with quieter models.

3.12.3 Complaint Records

A record relating to the management and monitoring of any noise complaints is to be maintained and documented in Complaints Record Form. The information required to complete the complaint form is as follows:

- Telephone number and location of caller (if provided);
- Date, time, and duration of offending noise;
- Callers description of the noise and any other comments;
- Weather conditions;
- Wind strength and direction;
- Detail any other complaints about the noise;
- Potential noise sources that could give rise to the complaint;
- Operating conditions at the time of the noise issue;
- Any follow up taken with the caller; and if required
- Updates to this document.

3.13 Odour Management

The nature of a portion of the waste materials handled at the site means that odour is likely to be an issue.

A number of measures are to be employed to ensure that odorous wastes are not accepted at the site and, if accepted, are handled appropriately.

Odour control is to be implemented through the following procedures:

- Adhere to strict waste acceptance procedures to ensure only permitted wastes are accepted on-site;
- Keep the site clean and tidy by way of a regularised housekeeping regime;
- The Site Manager/Operatives are to monitor for odours throughout the working day;
- In the event that odours are detected, investigations are to be undertaken to determine the cause and appropriate remedial action taken;
- In the event that non-conforming wastes are delivered to site eg; contaminated material, they should be isolated and removed from site at the earliest opportunity. If identified on the vehicle the waste is to remain in the vehicle and be sent off site to a suitably permitted facility; and
- If identified following a delivery, the waste will be removed to a designated quarantine area pending removal off site to a suitably licensed facility.

3.13.1 Odour Survey

An odour survey or 'sniff test' is to be carried out by the TCM/Site Manager or designated person when on site. The findings and any comments will be recorded on the Daily Site Inspection Sheet.

3.14 Pest Management

The nature of the waste materials handled at the site means that pest infestations are likely to be an issue. Operations at the site are to be undertaken such that infestation or colonisation by pests are prevented.

On a daily basis, the site will be inspected for pests by the Site Manager or designated person and recorded in the Daily Site Inspection Sheet. Should any pest activity be noted this is to be recorded and relevant actions and monitoring recorded.

All waste areas can be accessed and kept clean to prevent historic wastes providing a source for rodents/pests/flyes.

Site operatives employed on site are to be vigilant and report any potential infestations to the Site Manager, who will ensure appropriate measures are taken.

The following procedures will be followed to control and monitor any insect and rodent infestations:

- Surfaces used for the storage of waste are to be kept clean;
- Staff welfare/office areas will be kept clean and free of waste and exposed foodstuff;
- The site is to be monitored on a daily basis for any visible signs of rodent or insect activity, such as runways, and the findings logged in the site check sheet;
- If any signs of potentially problematic numbers of pests or vermin are discovered at the site, the Site Manager or designated person is to contact a pest contractor as soon as possible; and
- Should the use of pesticides or other means of pest control be recommended, they must only be implemented by persons qualified/trained to carry out the necessary measures.

3.14.1 Management of pesticides

In the event pest control products are required to be stored on site, the Site Manager or designated person will;

- Buy only enough pesticide for 3-6 months.
- Store pesticides away from waste stockpiles and operational areas.
- Keep pesticides in their original containers with the labels intact.
- Store in a separately and secure structure, away from children and pets.
- Do not store pesticides in cabinets near food, medical supplies, or cleaning products.
- Do not store pesticides near water supplies.
- Flammable pesticides should be stored away from sources of heat, flame, or spark.
- Store pesticides in a dry area to prevent the deterioration of containers.
- Inspect pesticide containers frequently for damage.

Any waste/out of date pesticides are to be disposed of as per the manufacturer's instructions.

3.15 Litter Management

All waste management operations on-site are to be undertaken to minimise windblown litter outside the site boundary. Due to the nature of wastes accepted on site litter should not arise during acceptance, treatment, or storage.

Wastes are stored internally and externally within designated areas around site which provides containment of any potential windblown litter.

Weather conditions are monitored on a daily basis. During high winds care will be taken when unloading/loading wastes where the risk of windblown litter/debris is increased.

The site is to be operated to comply with the following principles:

- Adhere to strict waste acceptance procedures to ensure only permitted wastes are accepted on site;
- In the event of any nuisance from litter occurring, pick up the litter immediately;
- The Site Manager or designated person is to undertake a daily inspection and litter pick of the site and perimeter; and
- All vehicles entering and exiting site will be covered/sheeted to prevent the escape of litter/dust.

On-site inspections for litter shall be made daily and remedial actions noted in diary and recorded on the Daily Site Inspection Sheet.

3.16 Dust Management

Wastes handled on site are not expected to generate dust. However, during traffic movements entering and exiting the site, there is a risk that some dust could occur temporarily.

In order to prevent the generation of dust, the Site Manager/TCM or site operatives must follow the mitigation measures proposed below to minimise and avoid any fugitive dust emissions to the surrounding area.

- All wastes are to be stored within the designated areas;
- Adhere to the site's speed limit;
- Be vigilant in noticing if dust is being visually generated;
- Cease site waste movement operations during periods of high winds to reduce the risk of dust leaving site;
- Where required, operational areas are to be kept tidy to reduce dust emissions;
- If areas are dusty dampen down using the site water supply/hose;
- Utilise the site road brush if required to clear areas external pavement/roadways that are visually showing dust deposits from daily site operations.

Visual inspections are to be carried out by the Site Manager or designated person on a daily basis, and more frequently if required during dry and windy conditions. Weather conditions are monitored on a daily basis. During processing a checklist is also provided to record weather conditions, dust suppression if used and visual monitoring.

The Site Manager or designated person shall assess the need for remedial action and implement such action where necessary. A record of the inspection findings and remedial action taken will be made on the daily inspection sheet.

3.16.1 Dust Monitoring

If dust is being generated the Site Manager or designated person will walk around the site and adjacent roads to determine if and dust from the site is causing an impact.

If dust from the site is causing an impact, the activities causing it will be ceased.

A note will be made in the site diary of action taken and a record made on the Daily Site Inspection Sheet.

3.17 Training Procedure

The below procedure covers the training requirements for any staff employed on site and to maintain continued competence on site.

The site is to be managed by sufficient numbers of staff competent to operate the site without causing pollution. Staff are to have clearly defined roles and responsibilities.

Training is to be provided when:

- A new employee/site operative begins work on-site;
- New equipment is introduced on-site, thereby changing the site's operating procedures;
- An audit identifies a particular training need; and
- New procedures are introduced, or procedures set out within the EMS or FPP are amended.

3.17.1 Site Operative Training

The Site Manager or TCM is responsible for ensuring that all site operatives receive the correct level of training and that all new site operatives receive an induction. All new site operatives are to be provided with clear instructions regarding their individual tasks and requirements.

In particular, emphasis is to be made in ensuring all site operatives are aware of the following aspects and environmental considerations:

- The aims and objectives of the Environmental Policy of the company;
- The conditions set out in the environmental permit, such as: permitted waste codes (EWC) and activities;
- Regulatory implications of the environmental permit for the site and their specific work activity;
- All potential environmental effects from operations under normal and abnormal circumstances;
- The need to report deviations from the conditions set out in the environmental permit;
- Prevention of accidental emissions and action to be taken should accidental emissions occur; and
- Training on plant and site-specific equipment;
- Training on the site FPP;
- The roles and responsibilities of all site operatives to ensure that all aspects of this EMS are complied with.

Training is to be provided as required to ensure that site operatives are familiar with their responsibilities and the conditions of the environmental permit. Training will also ensure that site operatives will be fully aware of how to maintain optimal plant performance.

A training record is to be kept in the head office site for all site operatives. Staff responsibilities and training records are to be kept:

- recordings each employee's name and position within the company;
- the training required by each individual site operative;
- the date due and carried out;
- a date for a refresher of the training; and
- any further comments.

The training requirements of existing and new site operatives are to be reviewed annually. Training is a continual process which ensures that site operatives are familiar with their responsibilities and the condition of the environment permit. Training will also ensure that site operatives will be fully aware of how to maintain optimal plant performance.

Regular toolbox training is also carried out, recorded, and signed by staff.

All site operatives are to be aware of basic Health and Safety basic requirements, and any specific Health and Safety related elements with respect to their role on site.

Any contractors enrolled on site will receive a suitable induction for Health and Safety and environmental risks.

Training Matrix is kept electronically for any staff employed on site will be kept up-to-date and stored on the computer system. Copies of any training certificates will be kept together with the Training Record.

3.17.2 Technically Competent Manager

All operations at the site are to be under the control of a technically competent person as directed by the permit.

Copies of certification and qualification dates will be displayed in the site office. Every two years a continuing competency assessment is required to refresh and requalify the qualified person.

3.18 Accident Procedure

The company recognises the importance of the prevention of accidents that may have environmental consequences and that it is crucial to limit those consequences. The company has developed a system to identify, assess and minimise the environmental risks and hazards of accidents and their consequences.

This accident management plan is to be implemented and maintained at the site to ensure the site and any site operatives are fully prepared for such incidents. The accident management plan is to be reviewed at least every four years or as soon as practicable after an incident with changes made accordingly to minimise the risk of occurrence.

This accident management plan describes the techniques to be implemented to minimise the risks posed to the environment. Activities affecting the health and safety (H&S) of any operatives, contractors and visitors are separately managed in compliance with H&S regulation.

3.18.1 Hazard Identification

The following hazards have been identified:

- fire and explosion;
- loss of containment – spillage and leakage;
- unauthorised waste receipt and processing;
- security and vandalism; and
- flooding.

Risk assessments in relation to the identified hazards are included below.

3.18.2 Risk Estimation

The Accident Management Plan has adopted a risk assessment approach to each potential hazard by combining the probability and magnitude of the potential risk to give an estimation of the risk prior to any mitigation measures. The risk management measures, which are designed to reduce the likelihood of occurrence, are then detailed followed by an estimation of the actual risk post-mitigation (Residual Risk Rating).

3.18.3 Control Techniques

The Site Manager or designated person ensures that:

- All incidents, near misses, abnormal events, changes to procedures and significant findings of maintenance inspections are logged and recorded in the Accident and Incident Record.
- Any site operatives employed have training requirements identified and the relevant training provided.

Accident Scenario and Consequence	Probability of accident occurring	Magnitude of Potential Impact	Risk rating before mitigation	Risk Management	Residual Risk Rating (following mitigation)
Spillage or leakage during transfer/overfilling of substances e.g fuelling Oils, Fluids etc Spillage or leakage of fuels, oils and fluids could result in a release to the environment affecting local land quality, surface water or groundwater.	Medium	Moderate	Medium	Care is to be taken during the transfer of fluids to ensure that spillages/leaks are minimised. In the event of a spillage, use a spill kit to clean up the spill. Spill kits are located onsite. Storage tanks and containers are to be checked on a daily basis to ensure there is sufficient capacity to prevent overfilling. In the event of a major spillage, which is causing or is likely to cause polluting emissions to the environment, immediate action is to be taken to contain the spillage and prevent liquid from entering surface water drains. The spillage shall be cleared immediately and placed in containers for offsite disposal, and the EA informed.	Low
Containment failure i.e., tank rupture, vehicle strike etc Spillage or leakage of fuel oils and fluids could result in a release to the environment affecting local land quality, surface water or groundwater.	Low	Moderate	Low	Fuels and maintenance fluids to be stored on site, within secure containment. All vehicles are checked daily to ensure no leaks or spillages. Care is taken when loading and unloading skips from vehicles to prevent leakages or tank ruptures.	Low
Plant and equipment failure Failure of plant and equipment can lead to impacts upon the environment if	Medium	Moderate	Medium	Plant and equipment are to be maintained in accordance with the manufacturer's recommendations. Plant and equipment are to be operated in accordance with the manufacturer's instruction manuals.	Low

Accident Scenario and Consequence	Probability of accident occurring	Magnitude of Potential Impact	Risk rating before mitigation	Risk Management	Residual Risk Rating (following mitigation)
maintained or operated in accordance with the manufacture's recommendations.				Plant utilised in the permitted area (if broken down or leaking) shall be removed off site immediately, or if it cannot be moved must have spill trays/bungs in place to control any escaping fluids. Induction training and refresher training is to be provided to staff in the safe operation of plant and equipment relevant to their role. Inspection of plant and equipment is to be undertaken on a daily basis to check for faults and ensure safeguards are in place for example pressure of vessels, guards on tools etc. In the event of a failure or suspected fault with an item of plant or piece of equipment, site management should ensure that the equipment is shut off in a safe manner and not used until the equipment can be repaired or replaced.	
Unauthorised waste receipt and processing Acceptance of unauthorised materials could result in impacts upon the environment for example odour, contamination of land, surface water or groundwater etc	Low	Moderate	Medium	Strict waste acceptance procedures are to be employed at the site as described in the Waste Acceptance Procedure. All wastes are to be subject to visual inspection and checking against the waste transfer note. In the event that unauthorised waste is delivered to the site, the waste is to be segregated and stored in a designated quarantine area prior to export from site to a facility licensed for its handling.	Low
Fire Risk of fire and electrical fires from incoming waste vehicles or plant Air transport of smoke, spillages, and	Low	Severe	Medium	All vehicles delivering waste will be checked for any evidence of waste that is on fire or that is smouldering on arrival at the site This is unlikely due to the waste types accepted at the site. The plant inspection schedule includes checks of electrical equipment used at the site to ensure that any faults are identified	Low

Accident Scenario and Consequence	Probability of accident occurring	Magnitude of Potential Impact	Risk rating before mitigation	Risk Management	Residual Risk Rating (following mitigation)
contaminated firewater by direct run off from site and via surface water drains.				and repaired. Fire extinguishers are provided at designated locations. Smoking is not permitted in operational areas of the site. Regular assessment (Fire Audit) and training of employees in fire prevention (See Emergency Preparedness & FPP) No wastes are to be burned on the site and any fire at the site is to be treated as an emergency. In the event of fire, the following action is to be taken: • Notify the fire brigade immediately and the Environment Agency as soon as practicable; • Isolate the burning area from other combustible materials and make attempts to extinguish the fire using the onsite fire extinguishers if safe to do so; • Where possible, try to prevent fire water from leaving the site; and • Evacuate the site if the fire is not containable.	

Accident Scenario and Consequence	Probability of accident occurring	Magnitude of Potential Impact	Risk rating before mitigation	Risk Management	Residual Risk Rating (following mitigation)
Security and vandalism Unauthorised access resulting in loss of containment or fire.	Low	Moderate to Mild	Medium/Low	The site has the following security measures in place; - Fencing: fencing extends around the site preventing access other than through the main gates - Site operates 24 hours, 7 days a week, 365 days a year. - Inspection: Site fencing and gates are checked daily by the operations staff to identify deterioration and damage, and the need for any repairs. All inspections will be recorded in the Daily Site Inspection sheet; - Maintenance and repair: gates and fencing are to be maintained and repaired to ensure their continued integrity. In the event that damage is sustained, repairs are to be made by the end of the working day. If this is not possible, suitable measures should be taken to prevent any unauthorised access to the site and permanent repairs affected as soon as practicable; - Authorised access system: all visitors to the site are required to register in the site diary and sign out again on exit to minimise the risk of unauthorised visitors being present on site; and - Monitoring techniques: operational procedures, including regular inspections will ensure continual monitoring of security provision at the site. - In the event of a breach of security at the site, the cause will be investigated, and appropriate mitigation measures implemented. This will be recorded in the Accident and Incident Record Form. Records will include inspections and	Low

Accident Scenario and Consequence	Probability of accident occurring	Magnitude of Potential Impact	Risk rating before mitigation	Risk Management	Residual Risk Rating (following mitigation)
				maintenance of security fencing and gates, breaches of security, investigations and actions taken.	
Flooding Could lead to potentially contaminating liquids impacting on local land quality, surface water and groundwater.	Low	Moderate / Severe	Medium	The site is not located within an area identified by the Environment Agency as at risk of flooding. There is a comprehensive drainage system with two interceptors within the permitted area, the interceptors can be isolated to prevent contamination.	Low

3.19 Spillage Procedure

The site is assessed for risk and control measures implemented to prevent/minimise the risk of a spillage.

Any fuel stored on site, will be contained within a bunded receptacle/container to contain any primary leaks. If any oil and vehicle maintenance chemicals are kept on site, they will be stored securely. In the event of a spillage a spill containment kit (absorbent pads, booms, or granules) will be used to prevent further spillage and the contaminated absorbents placed in a container for disposal to a suitably permitted facility.

All site surfaces will be inspected daily for the presence of spillages when the site is in operation. Any contaminated surface debris will be swept as required and sent to a suitably permitted site.

3.19.1 On-site control procedures

To prevent spills or escape of oils/fluids on site the below control measures are put in place;

- Fuels and oils on site are stored in a designated area;
- Spill containment kits on site;
- Plant and vehicles are refilled on the concrete parking area;
- Fuels and oils are stored away from moving vehicles and plant to prevent damage to containers/storage areas and to reduce the risk of contamination of waste and product onsite.

3.19.2 Major Spillage

In the event of a major spillage on site the Site Manager or designated person is to be contacted immediately and informed of the situation.

The spillage must be cordoned off. Site personnel must ensure that no persons or vehicles re-enter the affected area.

Should a major spillage occur, a check shall be conducted to ensure that all persons present on-site are safe and accounted for.

Any spillage of hazardous materials at the site shall be treated as an emergency and action taken as soon as practicable to absorb or contain it using the spill kit on site.

If the spillage cannot be controlled on-site, then a specialist contractor is to be contacted by telephone immediately.

The Operator/Site Manager is to contact the Environment Agency by telephone, and in writing, as soon as reasonably practicable, after a major spillage of hazardous materials to advise them of the incident and of the action taken.

A record in the site diary and incident report must be filled in to record any spills and action taken.

3.19.3 Minor Spillage

Action taken as soon as practicable to absorb or contain it using the spill kit on site.

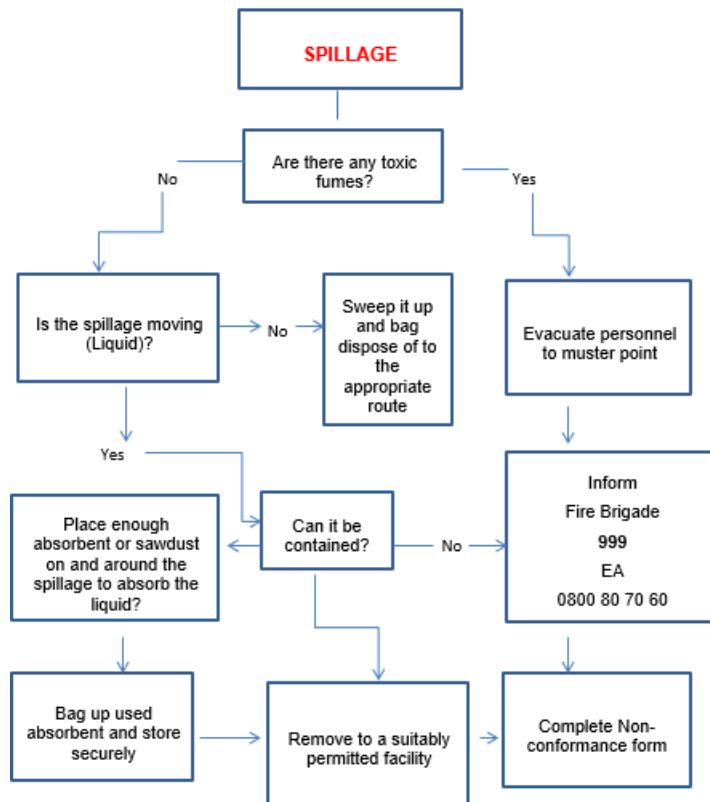
A record in the site diary must be filled in to record any spills including remedial action taken.

Spill kits will be clearly visible on-site for all personnel and contractors to see with adequate signage to instruct anyone on-site of the location of these.

Full training is to be provided to all relevant staff on the correct use of the Spill Kits.

Spill kits are checked on a weekly basis to ensure there is sufficient supplies and equipment available.

Figure 1 - Site staff actions in the event of a Spillage



3.20 Fire Prevention

The site has an approved Fire Prevention Plan.

3.21 Maintenance Procedure

All maintenance audits and monitoring for plant and equipment will be carried out in accordance with the manufacturer's specifications, which can be found in the site office.

This procedure includes a proactive approach to maintenance programs. The site manages plant and equipment servicing and MOT records using a site maintenance planner.

Defect sheets are completed for all plant/machinery and repairs carried out by staff or by a suitably qualified mechanic. Defect sheets are checked by the Site Manager or designated site staff.

Maintenance of all equipment is overseen by the Site Manager, with the following information compiled;

- the item that will require maintenance;
- how often maintenance will need to be carried out;
- a record of any particular maintenance instructions; and
- who on site will be responsible for each maintenance check.

This will ensure that if any site operatives employed are aware of their particular responsibilities for maintenance checking and ensure that any site operatives are aware of any amendments and additional maintenance required.

When a maintenance issue is dealt with, the site diary will be completed for equipment or infrastructure repaired.

This record will include the following information;

- the item/plant/vehicle maintained;
- the frequency any further required maintenance for instance; daily, weekly, or monthly;
- completed date and who carried out by; and
- any particular comments.

The records including any certificates and invoices will be kept in the site office to ensure records are available for reference or inspection.

3.22 Complaints Procedure

Any complaints received from the local public will be recorded on Complaints Record Form.

The complaint will also be recorded in the Site Diary (or other recording system).

Site Management will follow the steps set out below if a complaint is received at the site:

1. Details of the complainant (including; name, address, and a telephone number) if provided.
2. Make a record of the date and time the complaint was made.
3. What happened, what was the complaint actually about?
4. Was anyone else on site or other stakeholders aware of the issue and if so, who?
5. Once confirmation is made that the complaint issue relates to the site, investigate the source of the problem.
6. Record how the site has implemented methods to ensure the issue will not cause complaint in the future.
7. Make a record of any signs of pollution. If the complaint (such as emissions to groundwater or a local watercourse) is significant, the Environment Agency will need to be contacted on 0800 807060 as soon as possible. The severity of the incident will be determined by the Site Management.
8. For significant complaints email/verbal notification will be sent to the local Environment Agency office
9. All Complaint Record forms must be signed and dated.

Any actions taken in response to the complaint will be recorded on the Complaints Record form and the site diary.

The Environment Agency will be notified of any complaints received and the actions taken in response to the complaint. The complaints received will be reviewed during site audits to ensure the source of the complaint will be avoided in the future.

3.23 Contingency Planning

3.23.1 Breakdowns

Minor breakdowns can be managed with repairs will being carried out within 48 hours. All sites retain parts for some critical onsite equipment, in preparation for the maintenance and repair of onsite plant.

If repairs within this timescale are not possible, plant and equipment will be sourced from within the business or hired until such time as repairs have been completed.

If any vehicle, plant, or equipment breakdown leads to an interruption to waste handling or processing, discussions will take place between senior management, to discuss and plan to divert waste elsewhere until such time as the site can resume normal operations.

In the event there is a significant breakdown which will impact site operations, the EA will be notified. Discussions between the site and the EA in respect to timescales in relation to the recommencing of site operations.

In the case of total plant failure resulting in a prolonged delay in site operations, the contingency plan would be to cease all waste acceptance and utilise company fleet to remove waste from the site to third-party waste management companies until the situation was resolved.

3.23.2 Enforced Shutdowns

In the event the site is shut down for example due to flooding or major staffing issues, all deliveries to site will be ceased. Site security, emergency and fire prevention measures will be maintained. Senior site management will contact EA regarding actions and timescales in relation to the recommencing of site operations.

3.23.3 Fire

In the event of fire or any other major incident on site the contingency plan will be implemented. This means that all operations i.e. waste acceptance and treatment will be ceased until the Environment Agency or Fire Service advises Senior Management that it is safe to carry out the activities.

3.23.4 Storage Capacity

If during the daily site inspections, Site Management identify that waste storage areas are nearing/or at storage capacity, discussions will be made with senior management. Consideration will be made whether to:

- temporary cease waste acceptance until stockpiles are manageable;
- arrange for processed material to be moved off site utilising additional transport;
- divert wastes to other suitably permitted waste management facilities.

In the event of any delay to the removal of processed material from the site, senior management will contact the relevant 'waste receiver' in order to determine the anticipated length of the delay.

If deliveries to the site are scheduled, before the delay to waste removal is resolved, that would result in an exceedance of the storage capacity, Site management will contact the EA immediately and incoming deliveries will be ceased.

In addition, in the event of a contract failure with, or closure of, a waste receiver (and its operations) that could result in the storage of material on-site for a long period, Senior Management will contact the EA immediately.

3.24 Record Keeping

The company will keep the below records along with all waste duty of care records within the min site office on Barrington Road.

- Permits/exemptions issued to the site;
- other legal requirements;
- risk assessments;
- copies of the management system and associated plans;
- health and safety records;
- all operating procedures;
- staff competence and training records;
- emissions and any other monitoring undertaken if required;
- compliance checks, findings of investigation and actions taken;
- complaints made, findings of investigation and actions taken;
- audits of management system, findings (reports) and actions taken;
- management reviews and changes made to the management system;
- waste returns.

A copy of the site condition report is also maintained and kept to record the condition of the permitted area.

Keep this up to date through the life of the permit and will include the following information:

- records of any contamination and what was done in response to those incidents;
- records of any site audits, infrastructure or site improvements taken to protect land and since operation.

This is to show that the Operator has taken the necessary measures to avoid any pollution risk from site activities. Should the Operator wish to surrender the permit they can use the associated records to demonstrate they have returned the site to a satisfactory state and that the condition of land and groundwater has not deteriorated as a result of site activities.

3.22 Closure

This procedure outlines the preparation of the closure of the site at the end of its lifetime. The purpose of this procedure is to ensure that any site operative working on site is aware of the procedures in place to ensure when the site is closed the environment is protected.

The Operator is responsible for ensuring the delivery of all procedures described in the Environmental Management System.

Any changes required are the responsibility of the Operator/Site Manager or other designated person to update and re-issue the amended procedure.

In the event the decision has been made by Operator to surrender the permit, the need to show the necessary measures to avoid any pollution risks resulting from site activities must be provided along with the site has been returned to a satisfactory state.

Keeping the site condition up to date during the life of the permit will help demonstrate this. When applying to surrender a site condition report must be submitted.

Records relating to site inspection, repairs, spillages, or non-compliances shall be kept in preparation for this purpose.

4.0 Recording and Reporting Forms

The below forms will be used to carry out daily checks, routine maintenance, training, and reporting.

- Daily Site Inspection Sheet
- Monthly Auditing Checklist
- Non-conformance Report
- Waste Rejection Record
- Accident and Incident Record
- Complaints Record Form
- Permit to Work
- Plant Inspection Sheet (example)
- Training Matrix (example)
- Induction checklist