PEST MANAGEMENT PLAN

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BASIS OF REPORT

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1 Pest MANAGEMENT PLAN

1.1 Introduction

This document has been prepared on behalf of Think 3E in support of an Environmental Permit Variation Application for their Treatment and transfer facility at their site in 15 – 21 Links Road, Wellingbrough, NN8 4EY

The document provides a structured framework and approach in effectively managing potential pest and vermin issues associated with the operations at the site.

This Pest Management Plan document (referred hereafter as the 'PMP') provides a summary of the physical and management controls that will be employed to minimise pests at the site. It provides a site-specific assessment of the potential sources of pests, and the receptors it is likely to impact. The document also outlines the control measures including monitoring and contingency actions to be deployed at the site in order to prevent or minimise any infestation of pests.

1.2 Structure of Pest Management Plan

The OMP has been structured in accordance with the EA H4 Odour Management Plan Guidance.

This OMP has been developed to clearly define the measures by which odour emissions will be controlled and prevented, namely by;

- Receipt and Management of Food Materials;
- Limit availability of food stuff;
- Limit availability of habitat;
- Contracted Pest Management Company
- Pest Management Treatment;
- Monitoring and surveillance.
- Engaging your Neighbors;
- Response to Complaints;
- Ceasing or Reducing Operations; and
- Accident Management Plan.

The PMP considers the following aspects of the facility:

- Activities that have the potential to provide food source
- Actions to mitigate the effect of available food source (during normal and abnormal operations);
- Details of the sites monitoring regime;
- Details of responsible persons at the site and
- Potential outcomes of each failure scenario in respect to pest and vermin impact.

1.3 Status of the PMP

The PMP is a "live" document and will form part of the key environmental management document for the facility. All monitoring procedures, responsibilities and compliance actions will be updated as and when required.

Any revisions in the OMP or associated Annexes will be updated and inserted accordingly.

1.4 Responsibility for the Implementation of the PMP

The Operations Manager (also the TCM) is responsible for the PMP (Pest Management Plan), with shift Team Leaders serving as the deputy of the plan. The PMP is reviewed once a year but the compliance team to ensure it remains effective and up-to-date.

The Operations Manager has provided the necessary training to ensure staff are competent in implementing and reviewing the plan.

Effective communication is emphasised to maintain readiness, and additional refresher Toolbox talks undertaken throughout the year to the shifts.

Relevant operational staff are trained upon their induction and mandatory training upon the start of their employment, with training reviews undertaken by the management team undertaken throughout the year as part of their personal training plans.

2 SITE BACKGROUND

2.1 Site Setting

The site is located at 15 – 21 Links Road, Wellingbrough, NN8 4EY

The facility is permitted by the Environment Agency as a Hazardous Waste Transfer Station and is operated in accordance with the Environmental Permitting (England and Wales) Regulations 2018 (as amended).

The site is located within Links Industrial Estate with main railway line and sidings to the east, and industrial estate to the North, South and East. The site is roughly rectangular in shape and extends in area to approximately 5.3 ha.

The site is located predominantly within an industrial setting, with the nearest residential properties over 1km away from the site on the opposite side of the Mainline Railway and sidings located approximately 1.2km m to the southwest.

Hovis Flour Mill is directly adjacent to the site on the southwest boundary.

Within 10km of the site there are no national and internationally designated sites of ecological importance.

With this in mind the site is not considered to be overly sensitive in relation to potential pest and vermin impacts. Details pertaining to potential receptors would be limited to immediate neighboring Industrial units & businesses.

3. Facility and Process Overview

The site has been used by Think 3E Consortium Limited for the operation of a waste transfer station.

The site receives waste via curtain sider or smaller vans. The waste materials are subject to waste pre acceptance checks, waste reception checks and upon receipt are offloaded into the receiving buildings with waste being directed into shed 4 to be assessed and de-packaged. Please note that perishable goods are processed within 72hrs maximum but usually within 24 hrs. Waste that is non perishable is stored within the warehouse/ buildings and processed as required.

Waste Type	Perishable	Storage /Process time
Food Waste out of date or spoiled fresh/wet foods (ie from supermarket chains)	Yes	72hrs maximum but usually within 24 hrs.
Dry packaged goods, Glass jars of sauces and puddings, tinned food	No	Up to 12 weeks
Plastic bottles containing drinks	No	Up to 12 weeks
Milk cartons/plastic bottles.		72hrs maximum but usually within 24 hrs.

Food Waste from fast food chains – Comes in as sealed drums which are emptied and then washed out and returned to producer	Yes	72hrs maximum but usually within 24 hrs.
Plastic Waste from supermarkets – received as bailed waste or loose items stored in stillage cages	No	As defined in FPP for the site
Cardboard / dry packaging waste	No	As defined in FPP for the site
WEEE	No	As defined in FPP for the site

4. Source Pathway Receptor

4.1 Types of Pests

Waste operations are notorious for attracting pests or vermin. The most significant of these fall into three categories:

- Birds (notably various gull species, starling *Sturnus vulgaris*, carrion crow *Corvus corone*, and jackdaw *Corvus monedula*) Many different bird species may be considered a hazard or annoyance including Corvids, Pigeons, Starlings and Gulls. Birds are likely to be attracted by putrescible waste stored at a site. The varying species of Gull could often be the primary source of hazard or annoyance at a site
- Insects - There are around six insect species that have the potential to cause regular and significant problems on and around waste management facilities. Fly larvae occur in damp, decaying organic waste. However, each species will have a preferred niche in terms of temperature, moisture levels and nature of the material. Eggs for most species typically hatch within 1-2 days. To develop, larvae take from 3 days in summer to up to a month in winter. Subsequently, there is an increased chance of fly problems occurring where waste is stored for a prolonged period of time.
- Rats (most commonly the Brown Rat *Rattus norvegicus*) these Vermin are generally attracted to sewers, culverts, pipes and areas of abundant vegetation. Vermin are also very attracted to odours from waste streams that contain putrescible materials.

All these types are attracted primarily by the perishable food waste being deposited; and can cause considerable nuisance to people and business in the locality.

- Pests can cause a number of problems for those affected. In all cases, there is the risk of transmission of disease. Rats, for example, are frequently responsible for infecting humans with Weil's disease, a variety of the respiratory illness Leptospirosis.

- Birds can also transmit diseases to humans, but are more likely to be noticed because of their droppings, landing on property and on people. The proximity of other waste operators in the local area increases the risk of pest problems; as all these species, not just the birds, are fairly mobile and can travel considerable distances.

- Flies are most likely to transmit disease through contact – walking on food or a food-preparation surface after contact with waste.

The operator of any waste site must take appropriate measures to control the nuisance caused by these pests.

The control measures required for mitigation have some common features, all of which are “proactive” facets of general good management techniques - tidiness, prompt processing, and frequent observation of all aspects of the site. In addition, specific “reactive” control measures may be applicable to each specific type of pest.

4.2 Source of Pests

Food waste will be collected daily over a rolling weekly period as per the customer contract specification and will include putrescible components. Food waste will be stored within bays inside the main building equipped with roller shutter doors. Food waste is only stored on site prior to processing. Processing involves depackaging and bulking into covered articulated sealed trailers. Food wastes are dispatched from site in the covered articulated lorries. Perishable Food waste will be stored within bays inside the main building Shed 4 for a maximum of 48 hours (72 hours over a bank holiday or weekends) and is considered a medium risk in terms of pests.

Nonperishable food waste will be stored in sheds 3,9,12,13,14,15.

4.3 Release Points/Pathway

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

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

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

4.3 Receptors

Those likely to suffer nuisance from pests at this site are:

- Local residents although the nearest residents are a significant distance away
- Operational personnel (employees, contractors, third-party vehicle drivers, and visitors)
- Other local business and industrial sites many of which are waste operators
- Local properties

The severity of the nuisance will generally be directly proportional to the proximity of the receptor to the site.

5 CONTROL AND MANAGEMENT

5,1 General Control Measures

A number of general control measures should be routinely applied to minimise the number and impact of pests on the site:

- Provision of appropriate machinery and plant to ensure smooth daily operations
- Additional precautions for the handling of high risk waste streams (e.g. prioritising processing/despatch)
- Minimising the amount of waste on site
- Segregation of different waste streams that can cause a nuisance.
- Prompt 'turnaround' of any wastes with high organic content that may be particularly attractive to vermin
- Site Manager organising the cleaning out of bays when empty.
- Internal haulage fleet that ensure adequate provision of vehicles to ship waste out.
- Minimising generation of odours that could attract pests
- Good "housekeeping" in offices and mess rooms, to reduce availability of discarded food that might attract pests
- Keeping the working areas as tidy and clean as possible.
- Maintenance of buildings to repair damage where pests can gain entry
- Inclusion of observations of pests, evidence (e.g. droppings) and potential attractants during daily inspections, with reactive management
- Prompt response to complaints relating to pests
- Appointed pest control contractors used as and when needed (T3E retain a pest management contractor to undertake surveillance visits and treatment where required.).

5.2 Specific Control Measures - Birds

The presence of roosting areas encourages corvids (crows, starlings, and jackdaws) in particular to reside in the area, adding to the nuisance. The operations take place within the building to limit the roosting areas in view of the process. Bulk trailers are covered in theyard prior to removing the waste from site.

It should be remembered that the process of deterring birds (by any means) may cause annoyance, as they then fly over adjacent premises while leaving. However, our operating permits are clear that we must apply such controls. Keeping the site as tidy as possible should, at least to some extent, discourage them from visiting in the first place.

If required bird control is undertaken by the specialist contractor.

5.3 Specific Control Measures – Flies and Other Invertebrates

Flies are typically controlled using proprietary pesticides. Two types are employed: "contact" or "direct" pesticides provide an immediate control method, whereas "residual" formulations give a longer-term control by remaining active for some time after application.

In both cases, there is a serious problem: flies can develop resistance to many of these chemicals. This means

that they become less effective over time. Higher concentrations of the agent, or (usually more expensive) alternatives, will then need to be employed.

The pesticides also tend to be non-selective, and can also affect local populations of other species (not just invertebrates) that are not considered pests. Those that can have significant effects on the local environment should be avoided.
As a result, the use of pesticides should always be managed by specialist contractors, although the daily monitoring and application of insecticide can be performed by trained site personnel.
In addition to pesticides, other control measures can be employed, although most are more suited to indoor use.
Electronic fly killers, glue boards or strips, and light attractants can be effective in offices and welfare facilities.
Deodorising sprays can be beneficial, by suppressing the smells that can attract flies to the area; but are not generally effective by themselves.
These additional measures will be deployed as necessary. Flies differ from the other pest types in that the problem is largely seasonal, although the period of activity is based on temperature, and is therefore somewhat unpredictable. Indoor areas can continue to suffer nuisance from flies for some time after falling autumn temperatures outside have eliminated the problem on the main site.

5.4 Specific Control Measures – Rats

Brown Rats are ubiquitous in the UK, and thrive in urban, industrial, agricultural, and domestic environments. They are highly intelligent, and extremely wary of traps. As a result, control is generally very difficult.
Due to their secretive, largely nocturnal habits, they are less commonly observed directly. Evidence of infestation is often obtained from seeing their droppings, and other signs such as gnawed cables, or holes in floors and walls.

Prompt turnaround of waste (prioritising any with high organic content), and good housekeeping across the site can reduce the level of activity.
Rats also develop resistance to commonly-used poisons. The use and selection of rodenticides will be undertaken by the approved contractor.
These chemicals are extremely toxic, and should only be used by trained operators. Thus, deployment of them in bait boxes around the site will be contracted out to specialists.

5.5 Safety and Personal Hygiene

Because these pests are inevitably associated with waste operations (and indeed with most human activities), good personal hygiene is also essential. There are potential risks arising from both the presence of the pest species, and chemicals used in their control.
All persons working on, or visiting, the site should wash their hands before eating, drinking, or smoking.
Food and drink should be kept in closed, airtight containers. Leftovers should be deposited in rat-proof bins.
Any contact with control chemicals should be avoided wherever possible. Proper PPE should be worn if handling is required. The chemicals should never be transferred into un-labelled containers.
If any person feels unwell after close proximity to pest control chemicals, they should notify the Site Manager and seek medical advice without delay.
If any person develops influenza-like symptoms after working on or visiting the site, they should tell their doctor that they may have been exposed to Weil's disease/Leptospirosis.

6 Competent Operator

All site activities will be performed by competent and trained individuals who are both suitably qualified and experienced.

All personnel employed on site are suitably trained and experienced at operating all plant and equipment associated with their particular role; especially with regard to the acceptance and handling (and associated rejection) procedures in the event that unsuitable materials are received on site.

On occasions where these competent and experienced personnel are off work or unable to perform their role, the most suitable replacement will be sourced from the available workforce and any relevant training will be administered before they perform the task.

6.1 Engaging your Neighbors

If an action is being considered that has the potential to cause temporary odour impacts (however small) outside of the normal operational procedures, then the Local Environment Agency area team will be informed in advance. Neighbors who may be affected will be contacted to advise them of the operation being undertaken, and that any increase in vermin/pests will be of a temporary nature.

In addition, the site will engage with the local community as often as possible in order to alleviate against negative site perception. The site management shall operate a publicly accessible website, whereby contact information is published such that the public remain informed and are provided with a means of contacting the site if necessary.

6.2 Our community outreach activities

Newsletter / leaflet

Leaflet explaining about site activities, remedial actions and information about complaining procedures. The company may choose to communicate with residents regarding any incidents or issues via this media.

Website Information

Website update explaining about site activities, remedial actions and information about complaint procedures. The company may choose to communicate with residents regarding any incidents or issues via this media.

Meeting with residents

In the event of a major incident or an issue which may lead to complaints regarding odour, the company will carry out a formal letter drop to inform local residents about the OMP and future improvements to the site and invite residents to contact us through the appropriate methods and/or to attend a public meeting regarding the issues on site.

This PMP will be updated to include actions and outcomes from any community engagement meetings.

Members of the public are able to contact the company with any odour complaints about the facility by the following means.

By telephone 0300 111 2223 the contact number will normally be manned from Monday to Friday between the hours of 07:30 and 17:30. Outside of these hours, and on infrequent occasions during the

above hours when an immediate reply cannot be made, there will be an answer phone service which is checked by the Shift Managers 24/7.

or

By email to info@Think 3E.co.uk

These methods of contacting the site are displayed at the site entrance and on the company's website.

6.3 Response to Complaints

Receipt of an odour complaint during normal operations is treated as an exceedance of control levels. The primary response will be as detailed in accordance with the site's complaints procedure.

A Complaint Report Form will be completed as soon as the complaint is received.

An investigation shall be initiated into the cause of the complaint, this will involve as necessary:

- A pest survey. The results of the survey will be recorded on the Odour Reporting Form provided within Annex A;
- An examination of the site activities at the time of the complaint;
- An examination of the meteorological conditions at the time of the complaint; and
- A review of the effectiveness of operational and odour control procedures.

If the complaint is validated it will be treated as an exceedance of the control level. The outcome of the investigation will determine the corrective actions to be implemented.

6.4 Ceasing or Reducing Operations

If the investigations carried out as a result of the complaint suggest that the activities on site need to cease, no more waste will be accepted on site and the process will be stopped.

6.5 Accident Management Plan

The site maintains an accident management plan as required by the Environmental Permitting Regulations.

The accident plan sets out the actions to be taken and measures required to prevent incidents and where an incident occurs the appropriate mitigation action to be taken.

The plan considers the following scenarios:

- Any spillage / leaks or loss of containment;
- Any vandalism which could cause damage to the plant and equipment resulting in spillage of waste;
- Flooding;
- Fire due to plant malfunction or electrical equipment causing an ignition source;
- Receiving incompatible waste on site;
- Failure of main services;
- Failure of major plant and equipment;

- Failure or unavailability of any environmentally critical plant; and
- Being unable to receive waste into the site i.e. alternative storage or refusal of loads.

Please refer to Section 6 which provides more information on how the site will address any events which could cause odour emissions from site.

7. MONITORING and SITE CHECKS

7.1 Overview

Regular monitoring is carried out to assess the following;

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

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

7.2 Daily/ Weekly Checks

Daily inspections are carried out by Site Management and recorded on the daily/ Weekly IMS checklist.
The daily inspections include checks for the following;

- Pests
- Vegetation
- Drainage
- Infrastructure
- Litter

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

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

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

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

7.3 Records

Daily records shall be maintained (Form THINK 3E-Non Conformance Form) and include the following details:

- Results of inspections /monitoring carried out by site personnel;
- Weather conditions including wind speed and wind direction;
- Operational problems including date, time, duration, prevailing weather conditions

and cause of problem;

- Complaints received including address of complainant (if available);
- Details of corrective action taken, and any subsequent changes to operational procedures; and

- An evaluation of the effectiveness of control and abatement techniques used.

7.4 Specialist Contractor

Routine Inspections

In addition to the regular monitoring and checks carried out by site staff, approved pest control contractors are engaged to visit site on a monthly frequency as a minimum.

Management of Contractors

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

Regular review meetings will be held with the Specialist Contractors.

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

6.5 Reporting

Exceedance of a control level will be investigated (as described above) and recorded. This includes recording the following:

- Nature of the incident;
- Date of occurrence(s);
- Results of the investigation;
- Details of responses/ action plans implemented;
- The event will be marked within the site's incident log; and

- The report of any exceedance will be made available to the Environment Agency on a quarterly basis.