Environmental Management System Manual

Operator name: Marine & Boat Recycling Limited

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1 Definitions

Depollution - means the minimum technical requirements for the treatment of end of-life vessels, namely:

- removal of asbestos by a specialist contractor;
- removal of batteries and liquefied gas tanks;
- removal or neutralisation of potential explosive components (e.g. flares and distress beacons);
- removal and separate collection and storage of fuel, motor oil, transmission oil, gearbox oil, hydraulic oil, cooling liquids, antifreeze, air conditioning system fluids/gases and any other fluid contained in the end-of-life vessel unless they are necessary for the re-use of the parts concerned;
- removal, as far as feasible, of all components identified as containing:
    - mercury
    - polychlorinated biphenyls (PCBs)
    - lead
    - any hazardous chemicals

Floating boom – Floating barrier used to contain spillages and floating debris, always deployed and in all weather conditions.

Gross tonnage - is calculated in accordance with the tonnage measurement regulations contained in Council Regulation (EC) No 3259/94 of 22 December 1994 amending Regulation (EEC) No 2930/86 defining the characteristics of fishing vessels.

Vessels – Refers to any ship, vessel, craft, barge, boat, fishing vessel, floating industrial plant, floating production storage and offloading vessel, hovercraft/amphibious craft, in-shore vessel, merchant vessel, naval vessel, pontoon, sea-going vessel, storage vessel, submarine and shall include any partially dismantled ship, vessel or other craft.

2 Introduction

This document comprising an Environmental Management System (EMS) Manual has been prepared by Shann Pitts Consulting Limited on behalf of Marine & Boat Recycling Limited, herein termed 'the Operator,' for a waste treatment activity, namely the depollution and dismantling of vessels. The waste management and associated operations include depolluting and dismantling of vessels, sorting and processing of waste, and temporary storage of hazardous and non-hazardous waste.

The entire EMS will comprise of a series of 'live' documents to assist and inform daily site operations. This document, the EMS Manual, is an overarching document providing a foundation structure to the EMS which will link to specific EMS documents including Standard Operating Procedures (SOPs), maintenance schedules and template forms used for record keeping.

The EMS covers activities to be carried out:

- At Marine & Boat Recycling Hub Site, Ottery Park Industrial Park, Tavistock, Devon, PL19 8NS (Permit reference: EPR/NP3627SV/ (this version of the EMS accompanies the application for the bespoke waste operation permit), herein termed 'hub site'; and
- Under a bespoke mobile plant permit at other locations approved in accordance with deployment applications (Permit reference for bespoke mobile plant permit: EPR/EP3521SW), herein termed 'mobile site'.

The environmental risks arising from the waste treatment and storage activities at the hub site have been quantified in an Environmental Risk Assessment (Appendix A). The Environmental Risk Assessments summarise the relevant control measures and assess the residual risk.

The environmental risks arising from the waste treatment and storage activities under mobile operations will be assessed on a site by site basis including the control measures described within this EMS Manual. The site specific Environmental Risk Assessment will be submitted as part of each deployment application under the mobile plant permit once issued.

This EMS Manual provides more detail with respect to the Environmental Risk Assessments and the controls associated with the identified risks.

This EMS Manual is a live document that will be reviewed and amended as necessary. The Operator has provided the information for this EMS and the Operator has been consulted to ensure it reflects site activities accurately.

3 Environmental Policy Statement

Marine & Boat Recycling Limited (MBR) recognise that if the depollution and dismantling of vessels is not properly controlled and managed then the processes involved may pose risks to the environment, the amenity and human health.

With this in mind, MBR will ensure the following is undertaken:

- Compliance with relevant National and European Union Legislation;
- Assessment of the risks to people and the environment from its activities;
- Implementation of adequate control measures to minimise harm to both people and the environment;
- Review of control measures to ensure they are appropriate to minimise environmental risks; and
- Continual improvement in environmental performance wherever possible.

MBR aim to be the first UK end-of-life ship recycling facility to offer an auditable, zero to landfill solution,* with a focus on continuous improvement of the sustainable options for disposal of composite waste. MBR aim to reclaim all recyclable and reusable parts of the vessels that are dismantled, further improving the efficiency and sustainability of the process according to the waste hierarchy.

*Vessels constructed prior to 2000 may contain asbestos which will be removed by a specialist contractor; the only disposal route for asbestos is hazardous waste landfill.

4 Environmental Sensitivities

4.1 Hub Site

4.1.1 Location Details

Address: Ottery Park Industrial Park, Tavistock, Devon, PL19 8NS

National Grid Reference: SX 44433 75592

Local Authority: West Devon District Council, Devon County Council

4.1.2 Geology

The bedrock geology is 'Brendon Formation - Slate, siltstone and sandstone'. There are no records pertaining to the superficial geology.[1]

The site is on freely draining slightly acid loamy soils.

4.1.3 Hydrogeology

The bedrock geology is a Secondary A aquifer of high vulnerability.

The site is outside any Groundwater Source Protection Zone [2] and is not within 50m of any well spring or borehole used for the supply of water for human consumption including private water supplies. The site is not within a Groundwater Source Protection Zone or a Drinking Water Safeguard Zone for Groundwater.

4.1.4 Surface Waters

The site sits over 300m away from three tributaries of the Lumburn Brook as shown on the Sensitive Receptor Plan (Ecology) (see Site Plans). The Lumburn Brook waterbody was classified under the Water Framework Directive as having a good ecological status in 2022 and 'does not require assessment' for chemical status.[3] The site is not within a Drinking Water Protected Areas or a Drinking Water Safeguard Zones for Surface Water.

4.1.5 Ecology

There are no European Sites and or Sites of Special Scientific Interest within 200m of the site. There are Priority Habitat Inventory and Ancient Woodland sites within 1km of the site boundary as shown in Sensitive Receptor Plan (Ecology) (see Site Plans) but none closer than the area of Purple Moor Grass and Rush Pasture over 550m to the north east of the site.

4.1.6 Flood Risk

The site is within flood zone 1 has a low probability of flooding from rivers and the sea.[4]

4.1.7 Human Receptors

Human receptors within 1km of the hub site are shown on the Sensitive Receptor (Human) Plan (see Site Plans) and in Table 1 below. The closest residential receptors to the site are approximately 170m to the south of the site. There are other businesses operating from Ottery Park Industrial Park adjacent to the site who may be sensitive receptors.

[1] https://geologyviewer.bgs.ac.uk/ Accessed 10 June 2025
[2] https://magic.defra.gov.uk/MagicMap.aspx Accessed 10 June 2025
[3] https://environment.data.gov.uk/catchment-planning/WaterBody/GB108047007850 Accessed 10 June 2025
[4] https://flood-map-for-planning.service.gov.uk/ Accessed 10 June 2025

Table 1: Human Receptors (1km)

Receptor ID	Receptor name	Receptor type	Distance to site boundary (m)	Direction from site
R1	Other tenants of Ottery Park	Workplace	Adjacent	South and west
R2	Ottery Cottages	Residential	170	South
R3	Ottery Park Farm including Tavy Turf	Residential & Commercial	310	South west
R4	The Old Coach House Hotel	Residential & Commercial	235	South west
R5	Ash Tree Barns	Residential	525	South
R6	White House	Residential	840	South west
R7	Venn House Residential Home	Residential and Commercial	780	North east
R8	Beeches Farm	Residential & Workplace	740	South west
R9	The Copper Penny Inn	Workplace & Commercial	825	South west
R10	Mill Hill Slate Quarries	Workplace	795	South east
R11	Residential properties in Rushford	Residential	830	North east
R12	Widslade Farm	Residential & Workplace	965	North

4.1.8 Air Quality Management Area

The site is not within an Air Quality Management Area.[5]

[5] https://uk-air.defra.gov.uk/aqma/maps/ Accessed 20 June 2025

4.2 Mobile Site

As part of the pre-deployment planning process, a desktop study will be undertaken to determine the site sensitivities in accordance with Table 2 below.

Table 2: Site Sensitivity Information for each Mobile Deployment Application

Potential sensitivity	Information required	Information resources
Geology (if activities extend to land)	• Soil type • Superficial geology • Bedrock geology	British Geological Survey DEFRA Magic Maps
Hydrogeology	• Groundwater vulnerability • Presence of groundwater Source Protection Zones • Drinking Water Safeguard Zone for Groundwater	DEFRA Magic Maps
Surface waters	• Surface water sensitivity • Drinking Water Protected Areas or a Drinking Water Safeguard Zones for Surface Water	DEFRA Catchment data explorer DEFRA Magic Maps
Ecology	• European Sites and or Sites of Special Scientific Interest • Priority Habitats or Species	DEFRA Magic Maps Additional information may be sought from local environmental records centre to establish which protected species may be present. If any environmental concerns, including the presence of protected species or nesting birds is suspected, an ecological assessment engaging assistance and advice from the Environment Agency and if necessary, a specialist consultant, will be undertaken prior to works taking place.
Flood risk (if activities extend to land)	• Flood risk category	gov.uk Flood Map for Planning
Air Quality Management Area (AQMA)	• If site is in an AQMA	DEFRA UK Air, Air Information Resource

5 Details of the Activity

5.1 Waste Activities

5.1.1 Hub Site

The waste activities at the hub site require a bespoke waste operation permit.

Table 3: Hub Site Permitted Activities

Description of activities	Limits of activities
R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) **R4:** Recycling/ reclamation of metals and metal compounds **R5:** Recycling/ reclamation of other inorganic compounds **D15:** Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)	Treatment consisting only of depollution of waste vessels and sorting, separation, grading, baling, shearing, compacting, crushing, shredding or cutting of waste into different components for recovery. There shall be no treatment of lead acid batteries, other than sorting and separating from other wastes. The maximum quantity of hazardous waste treated for disposal or recovery shall not exceed 10 tonnes per day. This does not include the manual depollution and dismantling of waste vessels. Wastes shall be stored for no longer than 1 year prior to disposal and 3 years prior to recovery. The maximum quantity of hazardous waste stored at the site will not exceed 50 tonnes at any one time of which no more than 10 tonnes shall be stored for disposal. This does not include waste vessels awaiting manual depollution. No more than 25 tonnes of waste batteries (waste code 16 01 01* or 16 06 05) shall be stored at the site at any one time.

5.1.2 Mobile Site

The Operator will not undertake any waste management activity utilising mobile plant unless it is specifically listed in Table 4 below:

Table 4: Mobile Plant Permitted Activities

Description of activities	Limits of activities
R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) **R3:** Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes) **R4:** Recycling/ reclamation of metals and metal compounds **R5:** Recycling/ reclamation of other inorganic compounds	**Storage limits** All hazardous waste removed from vessels during treatment will be stored within containers with appropriate bunding. The following waste types will be stored in a secure sealed container: • any waste containing polychlorinated biphenyls (PCBs) • any waste containing lead • any waste containing mercury • any waste containing hazardous chemicals Asbestos will be double bagged and kept clearly identified, segregated, secure and in lockable containers. **Treatment limits** Treatment consisting of the depollution and dismantling of vessels by: • manual sorting • manual separation • hot and cold cutting • shredding • hydraulic sheering • power sawing Prior to any dismantling of a vessel an asbestos survey shall be undertaken to identify the presence of asbestos containing materials. Asbestos removal shall be carried out in accordance with Health and Safety guidance. There shall be no further treatment of asbestos waste following its removal. The dismantling of the hull of a vessel shall only commence when all liquids and hazardous materials have been removed or is dismantled in such a way so as to provide containment for any liquids or hazardous materials it contains until they can be removed or suitable alternative containment is provided.

5.2 Waste Types for Treatment

The waste types that may be accepted for treatment at the hub site or mobile site have the following European Waste Catalogue codes and descriptions as shown in Table 5 below:

Table 5: Waste Types

Waste	Description	Waste classification in accordance with the List of Waste (England) Regulations 2005.[6]
16	**WASTES NOT OTHERWISE SPECIFIED IN THE LIST**	
16 01	**end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)**	
16 01 04*	end-of-life vehicles (Boat and Ships only)	Absolute hazardous
16 01 06	end-of life vehicles, containing neither liquids nor other hazardous components (Boats and Ships Only)	Absolute non-hazardous

5.3 Waste Quantities

5.3.1 Hub Site

For the hub site operation, the total quantity of waste accepted at the site shall be less than 2,500 tonnes a year.

The maximum tonnages of stored hazardous and non-hazardous waste are shown in Table 6 below:

Table 6: Waste Types Produced at Hub Site

Type of waste	Type of container	Dimensions of container	Maximum number of containers
Batteries	Lidded battery box	1m^3	1
Lithium or Li-ion batteries	Lidded battery box containing sand	1m^3	1
Waste oil	Bunded tank with 4 No. 1.5m^3 compartments (3 for oil)	4.5m^3	1
Diesel	Bunded tank with 4 No. 1.5m^3 compartments (1 for diesel)	1.5m^3	1
Oily rags	IBC	1m^3	1
Sludge from boat wash	IBC	1m^3	2
Waste wood	Skip	12 yard skip	1
General waste	Skip	12 yard skip	1
Scrap metal	IBCs	1 m^3	4

[6] http://www.legislation.gov.uk/uksi/2005/895/contents/made Accessed 19th March 2024

Type of waste	Type of container	Dimensions of container	Maximum number of containers
Scrap metal	Skip	12 yard skip	1
Gas bottles	Cage	tbc	2
Flares and pyrotechnics	Locked box	tbc	1
Shredded GRP	Open top container	40 yard open container (Ro-Ro)	1 – Not stored as removed from site once full on day of shredding

5.3.2 Mobile Site

For the mobile plant operation, the maximum annual throughput and the maximum tonnages of stored hazardous and non-hazardous waste will be defined within individual deployment applications.

5.4 Principles of Operation

5.4.1 Overview

If vessels have been deemed transportable in their current state, they will be conveyed intact to the Ottery Park base, which will be used as a hub for processing vessels in the Southwest. The intention is to minimise any environmental impact on the wider region, waterways and harbours, by removing vessels to the central hub with minimal processing in-situ. The location of individual vessels requiring depollution and dismantling is not known prior to receiving an enquiry, so having a central processing location pre-prepared and away from sensitive waterways, will enable the Operator to react faster if a damaged vessel is causing immediate or urgent harm to its environment.

Prior to any works commencing on location, the specific risks posed by each vessel will be thoroughly assessed, including risks to both human health and the environment. The depollution and dismantling operations will be undertaken in accordance with the guidance from The Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships (2009)[7] where relevant (if the vessel if over 500 gross tonnes), and Resolution MEPC.211(63) – 2012 Guidelines for Safe and Environmentally Sound Ship Recycling.[8]

It should be noted that both the 2009 and 2012 convention and guidelines are centred around large scale facility (dry dock or yard) based ship recycling for large ships.

Refer to:

- Appendix B - Permitting Decision Flow (MBR-OD-02)
- Appendix C – Process Flow Diagram Hub Site (HUB-OD-01)
- Appendix D – Process Flow Diagram Mobile Site (MOB-OD-01)

5.4.2 Survey and Assessment

Where appropriate, a suitably qualified surveyor, marine engineer or structural engineer will survey vessels to determine if it is safe and practical to move them. If the vessel is in excess of 500 gross tonnes, then an application will be made to DEFRA ship recycling authorisation as required. In the vast majority of cases the vessel will be less than 500 gross tonnes and then the surveyor or competent

[7] https://www.basel.int/Portals/4/Basel%20Convention/docs/ships/HongKongConvention.pdf
[8] https://wwwcdn.imo.org/localresources/en/OurWork/Environment/Documents/210(63).pdf

manager appointed by the insurance company or port authority responsible for the recovery will be contacted. The process will then be agreed in writing between them and the Technically Competent Manager.

The following criteria will be used to establish whether vessels require an element of processing in-situ and if so to what extent:

- The vessel does not have a current, in date load line certificate and is not eligible for one, in accordance with The Merchant Shipping (Load Line) Regulations 1998.
- The vessel is not eligible for a load line exemption, in accordance with The Merchant Shipping (Load Line) Regulations 1998.
- The vessel cannot be removed by crane due to size, location or structural condition.
- The vessel cannot be towed due to size, location or structural condition.
- Movement of the vessel would cause environmental harm (riverbed, protected species, plant life etc.)
- The vessel cannot be transported by road due to its size, structural condition, road capacity or potential road obstructions (e.g. bridges).
- The vessel is at risk of breaking up in an uncontrolled fashion if transportation is attempted due to its structural condition.

Only vessels that cannot be moved to a drydock, slipway or land facility are considered for dismantling in-situ.

Where relevant, an appropriate, qualified asbestos surveyor will inspect vessels to determine the presence of asbestos. Additional surveys will be carried out to ascertain if any other hazardous materials are present onboard, including but not limited to the following: oils or fuels; bilge water; gas bottles; flares and distress beacons; paints and solvents; in addition to sweeping for sharps and / or drug paraphernalia if antisocial behaviour is suspected. The results of the survey will inform a Hazardous Waste Inventory which will detail all potentially hazardous waste on or in the vessel.

5.4.3 Hub Site

Minimal preparatory processing will be carried in-situ - exclusively for vessels that cannot be moved to a drydock, slipway or land facility in their current state, to facilitate their transportation to an appropriate site for full processing. The objective is to remove any hazards and pollutants from the sensitive environment of the waterways with minimal disturbance, whilst final processing will be carried out at the hub location and all waste materials sustainably recovered or disposed of in accordance with the waste hierarchy at regulated facilities.

If feasible the vessel will be moved to the hub site for depollution and dismantling. The process steps at the hub site are shown below:

- Storage of vessels awaiting assessment – recondition or recovery / disposal.
- Assessment of vessels to determine if they will be reconditioned or treatment for recovery / disposal.
- Storage of whole vessels awaiting depollution within ‘boat wash’ which is an impermeable basin with a sump and a pump.

- Depollution of vessels including removal of engines, batteries and liquids. Liquids to be drained via a hose to IBCs for storage pending recovery / disposal. Waste oil will be drained to a bunded tank.
- Washing of vessels in boat wash – dirty water will be pumped to IBCs for disposal.
- Removal of reusable parts / furnishings and storage in the chandlery.
- Removal of waste timber and furnishings and storage pending disposal as hazardous waste.
- Removal and storage of non-hazardous waste for recovery.
- Storage of liquids and batteries prior to removal off site for disposal or recovery.
- Storage of depolluted vessels prior to shredding.
- Shredding of glass reinforced plastic (GRP) vessels into an open top container for transportation off site.

The hub site operations will generally be carried out between the hours of 08:00 and 17:00 hrs Monday to Friday with extension to these hours in exceptional circumstances. The site planning permissions does not restrict operational hours.

5.4.4 Mobile Site Summary

If the vessel is not suitable for transport in its current state, then a deployment application will be made to the Environment Agency which will include:

- MPD1 form
- Site plan
- Sensitive Receptor plan
- Conceptual model and risk assessment based on environmental sensitivities as per Section 4.2 Table 2.
- Emission monitoring plans
- Evidence of technical competency
- Condition survey as per Section 5.4.2
- A Ship Recycling Plan (in accordance with International Maritime Organization guidelines).
- Where the deployment is to land adjacent to the watercourse, justification why this is a better environmental option than dismantling the ship in the watercourse.

Only once a deployment application has been approved will works on site commence.

Vessels will be depolluted prior to dismantling. Depollution can be undertaken from floating barges, or if the vessel is located next to a quay or dockside, the depollution will take place from the land with any hazardous by-products or waste collected and disposed of at a regulated facility upon removal from the vessel. The storage of hazardous materials on site will be minimised and all waste will be appropriately secured pending collection in the shortest possible timeframe.

A list of proposed plant, equipment and resources are in Section 5.4.7.

The floating and absorbent boom(s) and oil skimmer(s) will be deployed to every location where work is undertaken. If the vessel is not accessible from land, then services of a qualified diving and recovery contractor may be used to assist with relocating the vessel locally to a pre-agreed position for recovery. Alternatively, if the vessel is too large or liable to break up if moved, plant and equipment will be transported by road to the nearest suitable access point for a flat-topped barge. The plant will be loaded onto the barge, which will then be towed to the vessel's location. If the vessel is accessible

from the land via a suitable quay or access point for the equipment, then the vessel may be craned clear of the water for processing or accessed by plant working from the quay depending on the vessel specific requirements of the deployment. Once site-based processing has been completed, the plant will be removed from site and off hired or returned to our depot. The plant will remain on site only for the period necessary to process the vessel. The Environment Agency will be notified if the deployment requires extension due to any unforeseeable factors arising.

5.4.5 Depollution

All potentially hazardous materials will be removed from the vessel prior to dismantling.

Any asbestos containing materials on board will be removed by a licensed asbestos removal contractor as per the Control of Asbestos Regulations 2012.

All bilges and tanks will be emptied and cleaned by a competent specialist contractor.

All liquids generated from the bilge and tank extraction and cleaning will be stored in specialist bunded sealed containers. Depending on the vessels location, the sealed containers will be located on the dockside/landside or on the floating barge pending removal to a regulated site for disposal.

All hazardous materials will be removed from site directly, loaded onto road transport and taken to the appropriate regulated facilities for recovery or disposal at the earliest opportunity following removal from the vessel.

All potentially hazardous waste will be accounted for in the Hazardous Waste Inventory as it is removed. The process of depolluting vessels will be by specialist operatives using hand tools, with bilge and tank water being removed through pumps and sealed tankers. Operatives will only enter the vessel's hull if safe to do so, deck hatches may be removed to allow any gases to dissipate.

5.4.6 Dismantling

The method for dismantling the vessels hull will vary depending on the make-up of each vessel, its construction and material etc. but will include manual sorting, manual separation, hot and cold cutting, hydraulic sheering and power sawing.

All materials will be removed from the dismantling site directly, the material will be loaded onto road transport and taken to appropriate regulated facilities for recovery or disposal. Stockpiling and storage of materials will be minimal and only where direct road transport is not possible. All materials will be stored in suitable containers, sealed, locked and signed if required. The dismantling will be undertaken in a manner which retains the largest possible sections of the vessel which are suitable for transport, to minimise any debris entering the watercourse.

An excavator will be used for most of the dismantling process for larger vessels, while smaller vessels may be reduced by hand where practical in order to facilitate transport with minimal cutting and processing. If the vessel cannot be reached from the land, a floating barge will be deployed, with a smaller vessel to manoeuvre it and act as support in collecting any debris.

5.4.7 Plant & Equipment

The following resources / equipment may be deployed under the mobile plant permit to facilitate the depollution and dismantling operations.

There is always a trailer packed and ready for deployment to a vessel site to control any spillages which includes:

- Booms
- Oil and fuel skimmer(s)
- Emergency spill kits
- PPE

In addition the other plant and equipment that may be deployed to a mobile site include:

- Excavator machines
- Hydraulic shear attachment
- Rotating selector grab attachment
- Bucket attachments
- Forklifts / Telehandlers
- Mobile cranes
- Floating access barges
- Depollution equipment including pumps and suitable containers with drip trays
- Water tankers
- Water pumps
- Dust suppression / Extraction
- Lifting chains and man baskets
- Waste containers and drums
- Sealable and lockable liquid and solid waste containers
- Hand tools including nets
- Hot cutting equipment
- Skip lorries and skips
- Trailers / Lorries
- Roll On Roll Off Containers

6 Physical Control Measures - Controlled Waters & Land

6.1 Hub Site Control Measures

There are no emissions to water from the site.

A full survey of each vessel is carried out to include hazardous materials.

All undepolluted waste vessels are stored in the boat wash which is constructed of sheet metal with a sealed drainage sump. Vessels are washed and depolluted in the boat wash. The wash water from the boat wash sump is recirculated and disposed as a waste off site once it is not feasible to recirculate it further.

All waste liquids removed from the vessels are stored securely in bunded containers or tanks. Depolluted vessels are stored in concrete bays within a concrete pad area. All run off from the concrete area drains to an interceptor and soakaway. The concrete is inspected as part of the site Daily Checks **(HUB-MP-01)**. The interceptor is checked weekly in accordance with Weekly checks **(HUB-MP-02)** and emptied into IBCs for disposal if there is any oil or grease collected in the interceptor. The rest of the site is made up of hardstanding and will be used for the storage of non-waste and depolluted whole vessels only.

The site layout and drainage are shown on the Site Layout Plan (Appendix A).

There will always be a person 'on call' to respond to any alarms – this will either be the Technically Competent Manager (lives 5 minutes from site) and / or the Nominated Competent Person (lives 10 minutes form site).

The site is checked at least daily for any spillages (Daily Checks **HUB-MP-01**) and any spillages are cleared up as soon as possible and in accordance with the Spillage Procedure **(HUB-SOP-02),** utilising on-site spill kits. All staff are trained in the Spillage Procedure.

The site security measures to reduce the risk of arson and vandalism include:

- Heras fencing and an entrance gate; and
- Motion sensitive and thermal detection CCTV cameras (at least 3) which will send an alarm to a mobile phone(s).

There will always be a person 'on call' to respond to any alarms – this will either be the Technically Competent Manager (lives 5 minutes from site) and / or the Nominated Competent Person (lives 10 minutes form site).

6.2 Mobile Site Control Measures

The control measures to prevent emissions to controlled waters and land at mobile plant deployment sites will be determined through a site-specific environmental risk assessment which will form part of the deployment application for that site. However, the generic control measures for consideration are:

- Full survey of each vessel to include all hazardous materials. In the event that the vessel is fully submerged and internal inspection is not possible, it will first be raised inside the protective boom and provision made to capture any oils that may be present when it is pumped out.
- Placement of floating boom around vessel before any work commences and until work is complete.

- Depollution of vessels as a first process step.
- All bilges and tanks will be emptied with their contents being appropriately disposed of at an appropriate regulated facility.
- All washing down activities will be carried out using contained boat washing equipment with collection and pump out facility for wastewater.
- All polluting materials stored appropriately and removed immediately to appropriate regulated facility.
- The presence of spill kits and oil skimmers on site. If at any time oil/fuel/contaminated water is discharged from a vessel during recovery, spill kits and oil skimmers will be deployed immediately to remediate the spill, in accordance with the Spillage Procedure **(MOB-SOP-02).**

In addition the site security measures to reduce the risk of arson and vandalism include webcams with motion sensors linked via mobile internet to telemetry system which will send alarms to the Site Manager.

7 Control of Emissions to Air

7.1 Hub Site

A small generator will operate to provide power. It will be well below 1 MWth net rated thermal input and will therefore not fall under the Medium Combustion Plant Directive (MCPD) and associated emission limit values.

If for example a portable 7 kVA diesel generator is used it will have a net rated thermal input of 21 kWthi.

7.2 Mobile Site

A small generator will operate to provide power. It will be well below 1 MWth net rated thermal input and will therefore not fall under the Medium Combustion Plant Directive (MCPD) and associated emission limit values.

See Section 9.2 Control of Dust.

8 Management

8.1 Staff Structure

The Site Manager will have overall responsibility for the mobile and hub operations and will line manage a number of site operatives and any specialist contractors.

8.2 Technically Competent Management

8.2.1 Hub site

William Higgs will be the Technically Competent Manager (TCM) for the hub site.

The Operator may train or employ further TCMs; the Environment Agency will be notified should this happen.

The Site will be supervised by the TCM for at least 10% of operational hours or otherwise as agreed with the Environment Agency. This minimum attendance requirement has been calculated in accordance with the online Environment Agency guidance 'Legal Operator and Competence Requirements: Environmental Permits'[9] using the Site Operational Risk Appraisal (OPRA) score and banding.

The minimum attendance requirement calculation is shown in Table 7 below:

Table 7: TCM Minimum Attendance Requirement Calculation

Aspect	OPRA category	Associated points
Complexity (waste operation)	B	2
Location	A	1
Emissions	A	1
		TOTAL = 4 points which equates to 10% minimum attendance

The TCMs will note attendance hours in the Daily Checks **(HUB-MP-01).**

8.2.2 Mobile site

A recent consultation document on technical competence attendance suggests a required attendance by the TCM of 20% of operational hours for a bespoke mobile plant permit (not landspreading).[10] This will be confirmed with regulating officers during deployments of the mobile plant permit.

The TCMs will note attendance hours in the Daily Checks **(MOB-MP-01).**

[9] https://www.gov.uk/guidance/legal-operator-and-competence-requirements-environmental-permits Accessed 16 June 2024

[10] https://www.gov.uk/government/consultations/changes-to-technically-competent-manager-tcm-attendance-at-permitted-sites Accessed 17 June 2024

8.2.3 TCM Responsibilities

The TCM is responsible for:

- Ensuring that operational and TCM attendance hours are recorded;
- Carrying out site checks with respect to environmental and health and safety controls;
- Duty of care checks for waste loads entering and leaving the site;
- Relevant training for staff;
- Ensuring that incidents, accidents and complaints are recorded and reported as appropriate and that mitigations are actioned;
- Management of any contractors to ensure that they adhere to environmental and health and safety standards; and
- Maintenance of fire extinguishers and spill kits.

8.3 Staff Training

All staff will receive training on relevant Standard Operating Procedures including Spillage and Fire Procedures and management plans, including the Fire Prevention Plan for the hub site **(HUB-OD-02).**

Training records for staff will be recorded on the Training Matrix **(MBR-OD-04)** on the company shared drive.

The Site Manager or Technically Competent Manager is responsible for carrying out inductions for Site Operatives and any contractors. Toolbox Talks will be provided to Site Operatives on a regular basis to include:

- Spillage Procedure and location and use of containment measures – spill kits, floating boom, oil skimmers.
- Fire Prevention Plan and Fire Procedure.

8.4 Operations Management

8.4.1 Hub Site

The Site Manager will carry out the following daily checks and record them **(HUB-MP-01)**:

- Condition of any containment measures including boat wash.
- Waste storage is secure and within limits as stipulated in the Fire Prevention Plan **(HUB-OD-02).**
- Check for any leaks and spills.
- Fire Watch every four hours and at the end of the working day.
- Mobile plant maintenance is carried out as per maintenance schedules and recorded as necessary.
- There are no amenity impacts arising; noise, dust or litter; and
- Check on Site Security measures; CCTV cameras

The Site Manager is responsible for ensuring that:

- Daily Checks are carried out and recorded; Daily Checks **(HUB-MP-01)**;
- Operations are carried out in accordance with Vessel Depollution Procedure **(HUB-SOP-01)**; and
- Any contractors are correctly managed to ensure all tasks are carried out in accordance with safe working procedures and risk assessments.

8.4.2 Mobile Site

The Site Manager will carry out the following daily checks and record them in Daily Checks **(MOB-MP-01)**:

- Condition of any containment measures.
- Check for any leaks and spills.
- Mobile plant maintenance is carried out as per maintenance schedules and recorded as necessary.
- There are no amenity impacts arising; noise, dust or litter; and
- Check on Site Security measures.

The Site Manager is responsible for ensuring that:

- Daily Checks are carried out and recorded; Daily Checks **(MOB-MP-01)**;
- Operations are carried out in accordance with Vessel Depollution Procedure **(MOB-SOP-01)**; and
- Any contractors are correctly managed to ensure all tasks are carried out in accordance with safe working procedures and risk assessments.

8.4.3 Maintenance Plan

All plant is regularly maintained by competent trained mechanics or hired in on a job-by-job basis, depending on site and vessel specific requirements.

All company owned plant and machinery is to be inspected annually, in house, ensuring compliance with PUWER Regulation 1998 or hired from a reputable dealer. Excavators are to be serviced at 500-hour intervals. Plant and machinery on site are to be inspected before use and documented on a weekly basis. All plant and equipment are maintained by trained and competent mechanics. The condition of all the hydraulic systems on the excavators, their attachments and other plant is regularly checked to ensure risk of leaks are minimised.

Lifting equipment is to be inspected annually by an approved company. In addition, all lifting equipment used for lifting operatives are to be inspection at 6-month intervals. Compliance with LOLER Regulation 1998.

Skips and containers are to be inspected before use for integrity and ensure the safe use and to prevent the escape of waste through wear or damage.

Generators will be hired in and maintained under contract in accordance with running hours.

The mobile GRP shredder used at the hub site is hired in and maintained by the hire company.

8.5 Accident / Incident Prevention & Management Plan

8.5.1 Reporting of Accidents & Incidents Hub Site

To aid reporting of accidents and incidents at the hub site:

- A notice board will be displayed near the site entrance including the following details:

Marine & Boat Recycling Hub Site
Permitted by the Environment Agency, Permit number EPR/NP3627SV
Site Contact – Site Manager, Will Higgs – 07904 613925
Environment Agency Incident Hotline - 0800 807060

- An up-to-date list of Key Emergency Contacts will be maintained and displayed in the Site Office.

8.5.2 Reporting of Accidents & Incidents Mobile Sites

To aid reporting of accidents and incidents at the hub site:

A sign will be displayed at the site including:

- The Site Managers contact details including out of hours.
- The Environment Agency contact details.

There will be a list of key contacts pinned up in the site office including:

- First Aiders – names and phone numbers
- Site Manager contact detail in hours and out of hours.
- Emergency 999
- Medical (non-emergency) 111
- Police (non-emergency) 101
- Health and Safety Executive - serious or fatal injury
    - 0345 300 9923 in working hours
    - or 0151 922 9235 Out of hours
- Environment Agency Enquiry Line 03708 506 506
- Environment Agency 24-hour Emergency Hotline 0800 807 060
- Water company
- Electricity provider

8.5.3 Accident / Incident Prevention & Management Plan

The accident and incident prevention and management plan for the hub site is detailed in Table 8 below.

Table 8: Accident / Incident Prevention & Management Plan Hub Site

Possible Accident / Incident	Likelihood of occurrence	What would the environmental harm be?	How do we reduce the chances of it happening?	What to do if it happens
Spillage of fuel or oil from waste delivery / collection vehicles, plant and equipment including fixed plant.	Low	Contamination of land, drains, groundwater and water courses. Contamination of land unlikely as the vehicle movement areas are concreted. Any spillages could be contained on the concrete and cleared up.	Delivery of waste overseen. Daily Checks **(HUB-MP-01)** Spill kits on site. Plant and equipment are maintained regularly and in line with manufacturer's guidance.	Spillages will be dealt with in accordance with Spillage Procedure **(HUB-SOP-02)**
Spillage of fuel or oil from undepolluted vessels awaiting treatment	Medium	Low as undepolluted vessels are stored within the sealed boat wash	Daily Checks **(HUB-MP-01)** Spill kits on site. Ensure all undepolluted vessels are stored appropriately and depolluted as soon as practicably possible.	Spillages will be dealt with in accordance with Spillage Procedure **(HUB-SOP-02)**
Spillage of fuel or oil from depolluted vessels	Low	Contamination of hardstanding areas	Ensure depollution is carried out effectively by trained staff in accordance with the Vessel Depollution Procedure **(HUB-SOP-01)**	Spillages will be dealt with in accordance with Spillage Procedure **(HUB-SOP-02)**
Fire	Low	Smoke and pollution. Smoke could impact nearby business residents. Fire water could impact watercourse.	In accordance with Fire Prevention Plan **(HUB-OD-02):** Smoking is not permitted on Site. Waste stored within stipulated limits.	See Fire Prevention Plan **(HUB-OD-02)** & Fire Procedure **(HUB-SOP-03)**

Possible Accident / Incident	Likelihood of occurrence	What would the environmental harm be?	How do we reduce the chances of it happening?	What to do if it happens
			Fire watches are carried out daily **(HUB-MP-01)** Heat detection CCTV cameras linked to telemetry.	
Flood due to ingress of watercourse floodwater or fire water.	Very low	Contamination of land, drains, groundwater and water courses. Very low risk of this occurring as: The Site is not located within an area prone to flooding. Small risk of flood from fire water	Prevention of fires (see above)	Follow Fire Procedure **(HUB-SOP-03)**
Storms causing damage to site infrastructure and release of waste	Very low	As above	Ensure waste storage within limits and stored securely.	Spillages will be dealt with in accordance with Spillage Procedure **(HUB-SOP-02)**
Vandalism - unauthorised entry, tampering or malicious damage to property, plant and equipment	Low	Contamination of ground by fuel or oil Fire – fire water As above	All visitors have to sign into the Site. Site is secured through CCTV	Spillages will be dealt with in accordance with Spillage Procedure **(HUB-SOP-02)** & fires in accordance with Fire Procedure **(HUB-SOP-03)**

The accident and incident prevention and management plan for the mobile site will be determined on a site by site basis and will be included within the deployment application for that site.

8.5.4 Actions in the Case of All Accidents & Incidents

If an accident does happen and it may cause an adverse environmental impact, the operator will:

1. Immediately do what it says in the Accident / Incident Management Plan.
2. Do whatever else is necessary to minimise the environmental consequences.

3. Take all precautions to ensure the health and safety of both employees and external people is not compromised.
4. Notify the Environment Agency and / or Fire Service as appropriate.
5. Find out why the accident happened and mitigate the risk of it happening again.
6. Make a record of the accident and the subsequent investigation and mitigation on an Incident Report Form **(MBR-FT-01)**.
7. Review the Accident / Incident Management Plan as necessary

8.5.5 Environmental Incidents

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

- Breakdown or failure of equipment or technique
- Accident that affects the environment or has the potential to affect the environment
- Emission of a substance not controlled by an emission limit which has cause, is causing or may cause significant pollution
- Breach of a limit specified in the permit
- Any significant Adverse Environmental Effects

Incident, as per the list above, with be recorded on the Incident Report Form **(MBR-FT-01).**

8.5.6 Health & Safety Accidents

In the event that anybody working on the site is injured, a first aider will attend to provide basic medical treatment. The Ambulance service will be called if deemed necessary by the first aider.

The Site Manager on site should instruct a site operative to wait at the site entrance to guide the ambulance services to the injured personnel. All accidents or incidents to employees, visitors or the public resulting from accidents on site will be recorded in the accident book.

8.6 Complaint Policy & Procedure

It is important to Marine & Boat Recycling Limited to be a good neighbour and to ensure that all of the activities the hub site and any mobile sites, do not have an adverse effect on the local community.

Marine & Boat Recycling Limited are committed to ongoing engagement with the local community. If any activity is scheduled which may have a negative impact on the local community, then neighbours will be contacted to communicate plans with as much notice as possible. There will be a Site Notice Board in place to include contact details for in and out of office hours for Marine & Boat Recycling Limited and the Environment Agency.

All complaints will be fully investigated. Action will be taken to rectify the situation as necessary and as soon as possible and to let the complainant know what this action has been.

If a complaint is made to the company, it is to be recorded in the Non-conformance & Corrective Action Log **(MBR-OD-05)** accessed via internal electronic document system OneDrive. The date, details of complainant and nature of the complaint will be recorded, considered internally with any corrective action also recorded.

8.7 Contingency Planning Hub Site

If the vessel storage capacity for undepolluted or depolluted vessels is unduly limited due to the mobile shredder availability or staff shortages or if the maximum waste storage capacity (as specified in Table 4, Section 4.8 and the Fire Prevention Plan **(HUB-OD-02**)) may be compromised, the Operator will ensure that no further vessels are accepted for treatment.

The Operator will stop accepting waste for treatment in the case of;

- Exceedance of waste storage limit;
- Accidents that may result in pollution to the environment; and
- Staff shortages.

In the event of an accident the Operator will follow the procedures in the Accident / Incident Prevention & Management Plan (see Section 8.5.3).

8.8 Review of Management System

The EMS will be reviewed and updated as necessary, in the following circumstances:

- When there are changes to the Site, operations or equipment that affect the activities covered by the environmental permit;
- When an application is made to vary the environmental permit for the hub site or the bespoke mobile plant permit;
- After any accident, complaint or breach of environmental permit; and
- If a new environmental problem or issue arises and new control measures have been implemented to control it.

A record will be kept of any changes made to the EMS.

9 Amenity Impacts & Controls

9.1 Overview

The control measures to prevent amenity impacts from mobile plant deployment sites will be determined through a site-specific environmental risk assessment which will form part of the deployment application for that site. However, the generic control measures for consideration are detailed in the Mobile Site sub-sections below.

9.2 Control of Dust

9.2.1 Hub Site

The GRP shredder has the potential to generate dust emissions but is used infrequently when hired in (one day every few months). When the shredder is in operation water suppression will be used as required using rainwater collected on site.

Dust is monitored daily at the site boundary downwind; Daily Checks **(HUB-MP-01).** This frequency will be increased in dry conditions or if the shredder is in use.

9.2.2 Mobile Site

The risk of dust generation is deemed to be low. However a dynamic risk assessment will be carried out and water suppression or extraction will be used as required. Neighbouring residents and other third parties who could be impacted, will be identified for each deployment location.

9.3 Control of Noise & Vibration

9.3.1 Hub Site

The hub site operations will generally be carried out between the hours of 08:00 and 17:00 hrs Monday to Friday with some extension to these hours in exceptional circumstances. The site planning permissions does not restrict operational hours.

The potential sources of noise and vibration from the hub site and associated controls are:

1. Vehicles entering or leaving the site with vessels or waste.
2. Vehicles moving around the site:
    - All vehicles used at the Site are maintained in good efficient working order.
    - Machines in intermittent use are shut down or throttled down in the intervening periods when not in use or throttled down to a minimum.
3. The mobile shredding operation is a short term activity i.e., one day every few months and any noise generated will be during normal working hours.

Given the control measures in place and the fact that the closest residential receptors to the site are approximately 170m to the south of the site, it is not anticipated that noise from the permitted activities will be an issue. Noise is monitored daily; Daily Checks **(HUB-MP-01).** If noise and or vibration is found to have an impact on the local amenity then a Noise and Vibration Management Plan will be written and actioned.

9.3.2 Mobile Site

Machinery will lead to noise emissions particularly during the dismantling process which would be deemed to be comparable to the noise emission from a small construction site, with excavators and

telehandlers operating. Neighbouring residents and other third parties who could be impacted will be identified for each deployment location.

Vessel dismantling is a short-term activity and any noise generated will be during normal working hours, with the exception of emergency recovery situations. Noise impacts will be minimised by:

- carrying out as much final processing as possible at the hub site with few near neighbours and only carrying out such work externally that is necessary in order to facilitate transport of vessels.
- ensuring all plant and equipment is maintained and in good working order.

Low levels of vibration will be generated throughout the dismantling process. Site specific requirements will be assessed prior to each deployment, based on the individual location. Vessels being depolluted and dismantled under the mobile plant permit are likely to be fully or partially submerged in the water. As such, vibration will not be transferred to any nearby property. Vibration is not considered to be detrimental to any aquatic life. If any protected species or habitats are identified during our pre-deployment study, the Environment Agency and relevant ecological experts will be consulted.

9.4 Lighting

9.4.1 Hub Site

Additional lighting may be used at times however, this will not impact residential receptors at this location.

9.4.2 Mobile Site

Additional task lighting may be required on occasion for short durations , particularly during the winter months. Works will typically be undertaken during normal working hours, in daylight. However, location specific arrangements may need to be made depending on conditions and especially when operating in tidal locations. These will be assessed and recorded in each individual mobile plant deployment application where relevant.

Vessels being depolluted and dismantled under the mobile plant permit are likely to be fully or partially submerged in the water away from nearby residents. The risk of significant pollution from light to nearby residents, stakeholders or the environment is likely to be low and any task lighting requirements will be short term.

9.5 Litter

9.5.1 Hub Site

The waste treatment activities pose a low risk of litter generation. There will be a daily walk around and litter pick as part of the Daily Checks **(HUB-MP-01).** All waste will be stored securely and disposed of appropriately.

9.5.2 Mobile Site

All waste will be removed into appropriate skips, tanks or containers during the depollution and dismantling process, with minimal stockpiling to facilitate removal. The dismantling will be carried out in a manner which results in the largest practical sections of vessel being removed, to facilitate transportation and minimise small debris entering the watercourse. If any debris are inadvertently created or fall into the water course, it will be contained with the boom and removed by nets or

machine. The risk of litter will be reduced through good housekeeping on site and Daily Checks and clean up as required **(MOB-MP-01)**.

9.6 Other Amenity Impacts

9.6.1 Hub Site

In accordance with the Environmental Risk Assessment (Appendix A), there is a low risk of other amenity impacts i.e., pests, mud on road or odour.

9.6.2 Mobile Site

An individual site specific risk assessment will be produced on a site specific basis as part of the deployment application.

10 Site Records

10.1 Normal Operations

The following records will be kept:

- Maintenance of plant and machinery (other than that hired in from third parties e.g., the mobile shredder at the Hub Site).
- Daily Checks for Hub Site **(HUB-MP-01)** to include Fire Watches, operational hours and Technically Competent Management attendance on site.
- Daily Checks for mobile sites **(MOB-MP-02)** to include operational hours and Technically Competent Management attendance on site.

10.2 Abnormal Events

Environmental incidents will be recorded on the Accident & Incident Report Form **(MBR-FT-01)**.

Complaints and subsequent investigation will be recorded on the Non-conformance & Corrective Action Log **(MBR-OD-05)**.

10.3 Records of Waste Movement

A record will be kept of all waste movements to and from the hub site and from the mobile sites. The records will include the following details:

- Date and time of movement
- Origin of waste
- Nature of waste received including European Waste Catalogue code
- Quantity of waste
- Driver name
- Vehicle registration.

Duty of Care Waste Transfer Notes (electronic or paper) and Hazardous waste consignment notes (including the consignee return sections) will be kept for a minimum of 2 years.

Quarterly waste tonnage returns will be submitted to the Environment Agency as stipulated by the Environmental Permit(s).

11 Management System Documents

The management system documents relevant to operational control are Overarching Documents (ODs) including management plans, Standard Operating Procedures (SOPs), monitoring and maintenance schedules and the record keeping forms associated with the SOPs (Form templates or FTs).

The documentation associated with the management system is presented in a consistent format including:

- Title of document
- Document reference in the format XXX-YYY-NN where:

  'XXX' is:

  - MBR for documents relevant to hub site and mobile site operations
  - HUB for documents relevant to hub site operations
  - MOB for documents relevant to mobile operation carried out in accordance with the mobile plant permit and an approved deployment application

  'YYY' is:

  - OD denoting an Overarching Document, for example a management plan
  - SOP is a Standard Operating Procedure
  - MP is a Monitoring and / or Maintenance Schedule.
  - FT is a form template used to make records

  'NN' is a unique number to identify the document.
- Document author / name of person who issued the document.
- Version number
- Date of issue

Table 9 below lists the management system documents relevant to operational control

Table 9: Management System Documents

Document reference	Document title
Marine & Boat Recycling Overarching Documents	
MBR-OD-01	Environmental Management System Manual (this document)
MBR-OD-02	Permitting Decision Flow
MBR-OD-03	Personal Protective Equipment and Respiratory Protective Equipment Policy
MBR-OD-04	Training Matrix

Document reference	Document title
MBR-OD-05	Non-conformance & Corrective Action Log
Marine & Boat Recycling Form Templates	
MBR-FT-01	Incident Report Form
Hub Site Overarching Documents	
HUB-OD-01	Process Flow Diagram Hub Site
HUB-OD-02	Fire Prevention Plan
Hub Site Standard Operating Procedures	
HUB-SOP-01	Vessel Depollution Procedure
HUB-SOP-02	Spillage Procedure
HUB-SOP-03	Fire Procedure
Hub Site Monitoring and / or Maintenance Schedule	
HUB-MP-01	Daily Checks
HUB-MP-02	Weekly Checks
Mobile Site Overarching Documents	
MOB-OD-01	Process Flow Diagram Mobile Operations
Mobile Site Standard Operating Procedures	
MOB-SOP-01	Vessel Depollution Procedure
MOB-SOP-02	Spillage Procedure
MOB-SOP-03	Fire Procedure
MOB-SOP-04	Mobile Deployment Site Decommissioning Procedure
Mobile Site Monitoring and / or Maintenance Schedule	
MOB-MP-01	Daily Checks

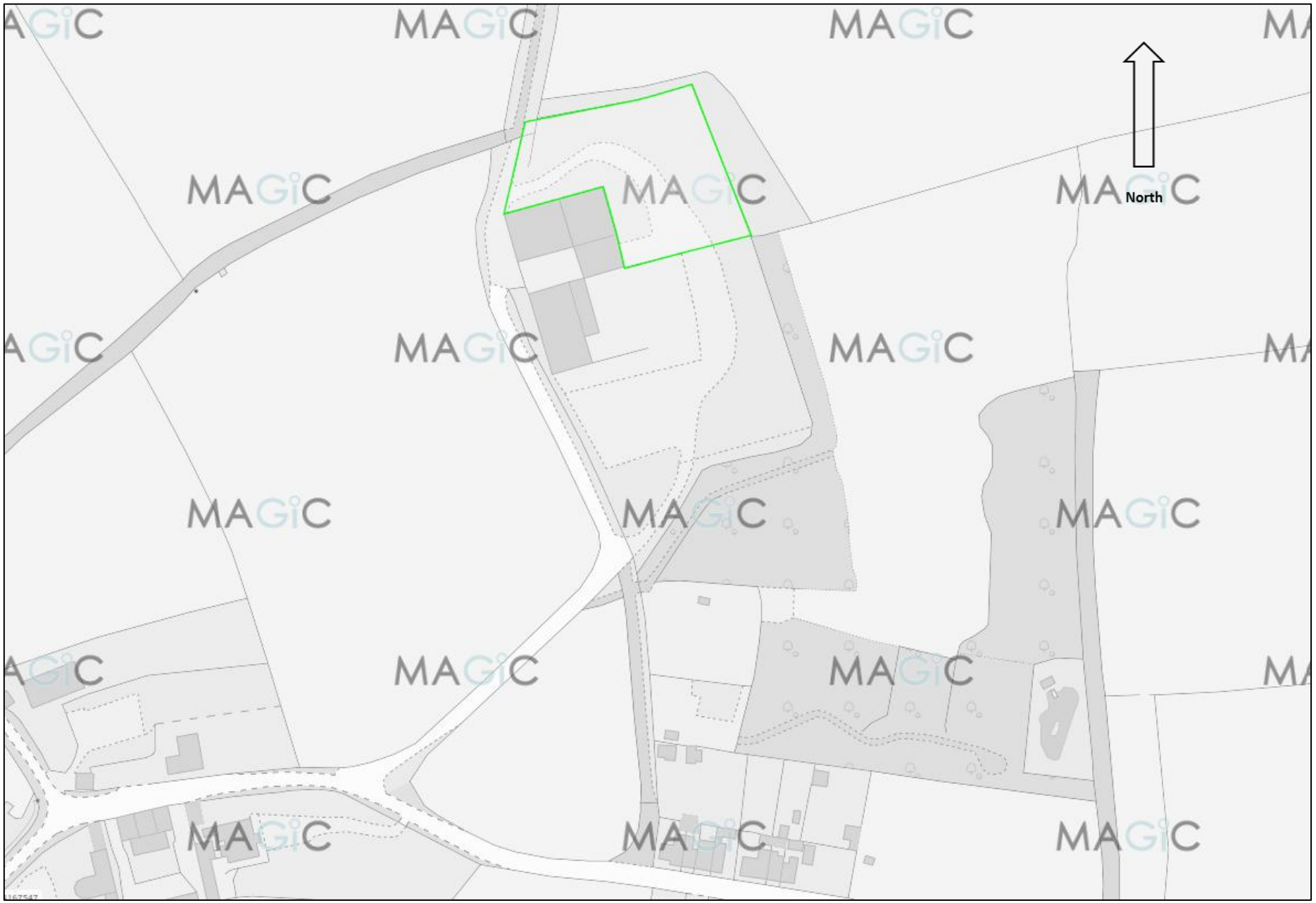
Hub Site Plans

Permit Boundary Plan (SPC0126/MBR/Permit Boundary Plan/V3.0)

Sensitive Receptor (1km) Human Plan (SPC0126/MBR/Sensitive Receptor Plan (Human)/V3.0)

Sensitive Receptor (1km) Ecology Plan (SPC/0126/MBR/Sensitive Receptor Plan (Ecology)/V3.0)

Site Layout Plan (SPC0126/MBR/Site Layout Plan V2.0)



Permit Boundary Line

Project: New bespoke waste operation permit application, Ottery Park Industrial Park, Tavistock, Devon, PL19 8NS

Client: Marine & Boat Recycling Limited

Title: Permit Boundary Plan

Reference number: SPC0126/MBR/Permit Boundary Plan V3.0

Date: June 2025

Produced by: Emily Shann Pitts, Shann Pitts Consulting Limited

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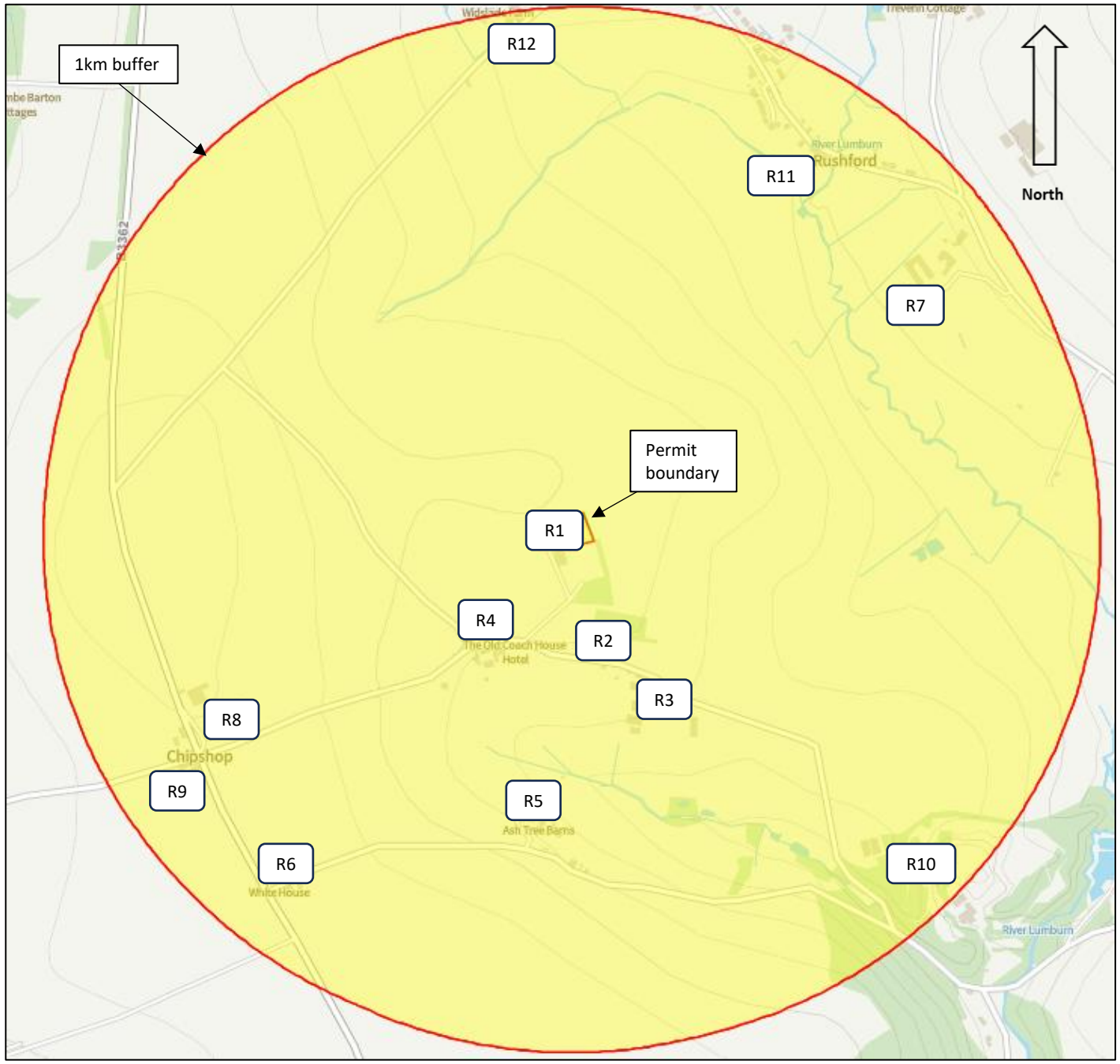

Receptor ID	Receptor name / type
R1	Other tenants of Ottery Park (Commercial)
R2	Residential Properties to south
R3	Ottery Park Farm including Tavy Turf (Residential & Commercial)
R4	The Old Coach House Hotel
R5	Ash Tree Barns
R6	White House
R7	Venn House Residential Home
R8	Beeches Farm
R9	The Copper Penny Inn
R10	Mill Hill Slate Quarries (Commercial)
R11	Residential properties in Rushford
R12	Widslade Farm

Project: New bespoke waste operation permit application, Ottery Park Industrial Park, Tavistock, Devon, PL19 8NS

Client: Marine & Boat Recycling Limited

Title: Sensitive Receptors (Human) within 1km

Reference number: SPC0126/MBR/Sensitive Receptor Plan (Human)/V3.0

Date: June 25

Produced by: Emily Shann Pitts, Shann Pitts Consulting Limited

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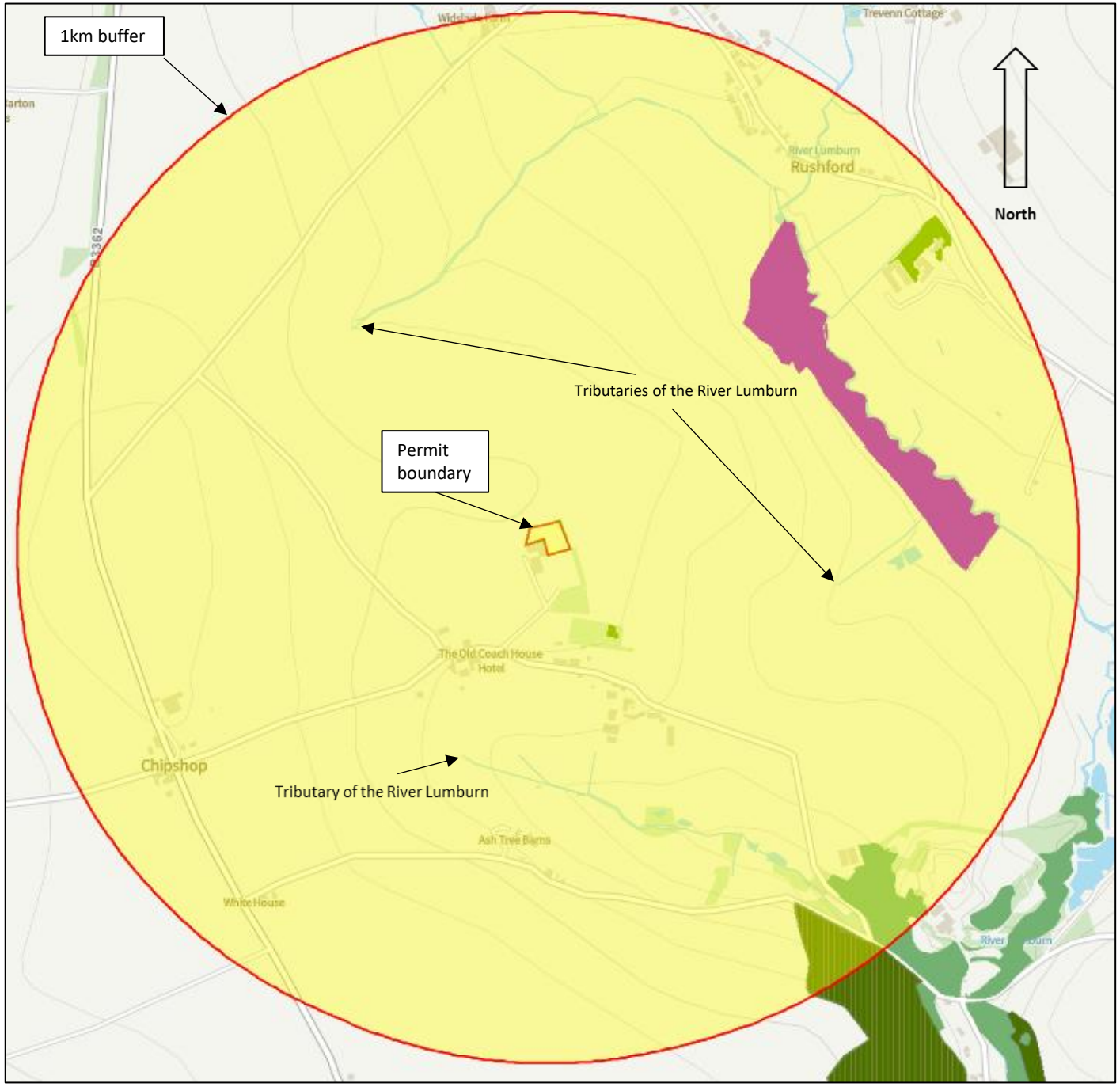

Legend:

- Priority Habitat Inventory - Traditional Orchards (England)
- Ancient Woodland (England)
  - Ancient and Semi-Natural Woodland
  - Ancient Replanted Woodland
- Priority Habitat Inventory - Deciduous Woodland (England)
- Priority Habitat Inventory - Purple Moor Grass and Rush Pasture (England)

Project: New bespoke waste operation permit application, Ottery Park Industrial Park, Tavistock, Devon, PL19 8NS

Client: Marine & Boat Recycling Limited

Title: Sensitive Receptors (Ecology) within 1km

Reference number: SPC0126/MBR/Sensitive Receptor Plan (Ecology)/V3.0

Date: June 25

Produced by: Emily Shann Pitts, Shann Pitts Consulting Limited

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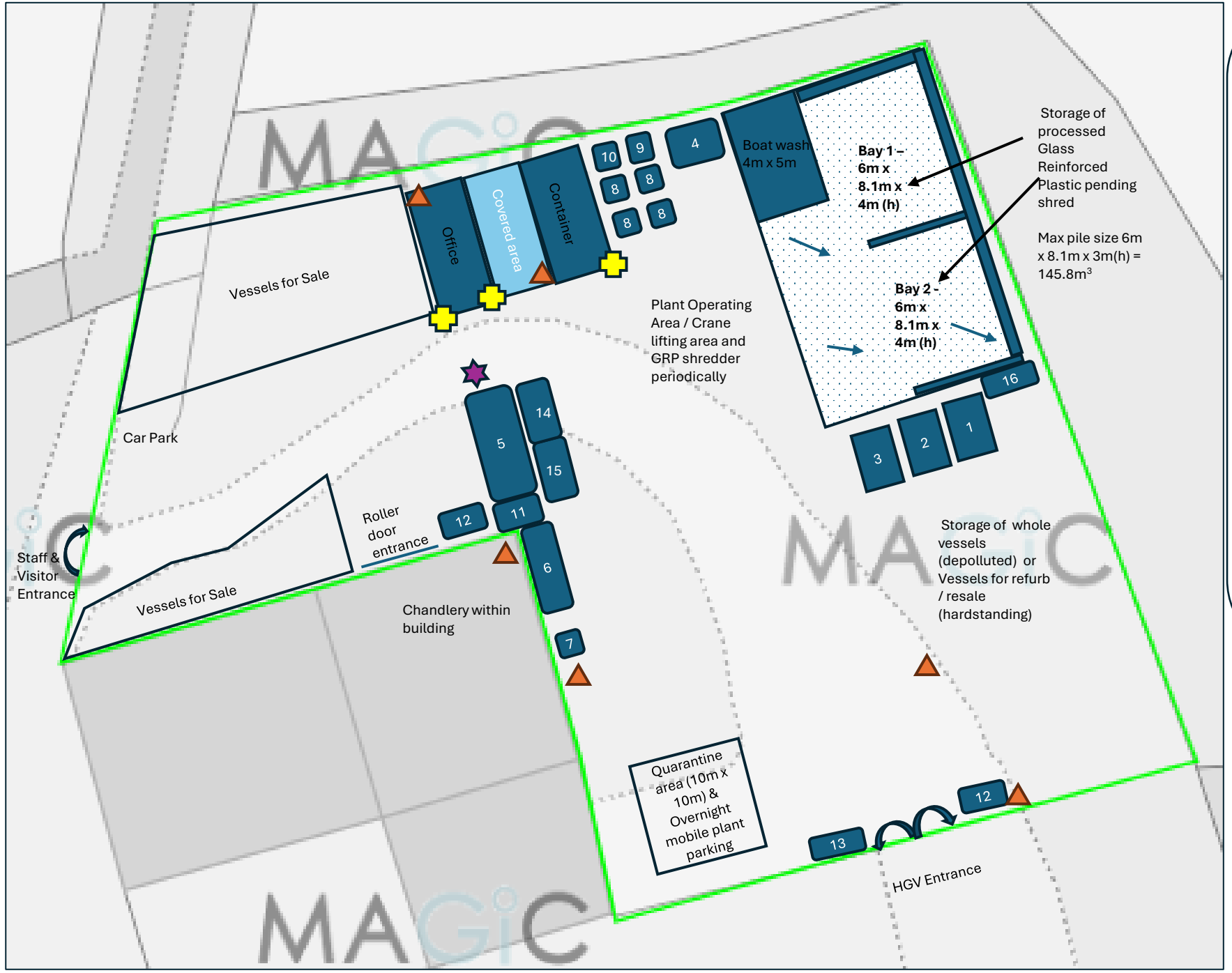

1	Wood skip
2	General waste skip
3	Metal skip
4	Water settlement system
5	Shepherds hut for parts and equipment storage
6	Waste fuel and oil storage (segregated)
7	Storage for oily rags (IBC)
8	IBCs for scrap
9	Lithium battery storage box
10	Lidded battery box
11	Rainwater storage (6m³)
12	2 No. Cages for gas bottles
13	Locked storage box for flares & pyrotechnics
14	Lifting gear and tool store
15	Props storage
16	Interceptor and soakaway
→	Drainage flow direction
	Permitted area
	Concrete area
	Fire extinguisher locations
	Spill kit location
	Heat Detection CCTV Location

Title: Site Layout Plan

Project: New bespoke waste operation permit application, Ottery Park Industrial Park, Tavistock, Devon, PL19 8NS

Client: Marine & Boat Recycling Limited

Reference number: SPC0126/MBR/Site Layout Plan V2.0

Date: September 2025

Produced by: Emily Shann Pitts, Shann Pitts Consulting Limited

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Appendix A - Environmental Risk Assessment Hub Site

Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequences be if this occurs?**	**What is the overall magnitude of the risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of the risk after management?**
Local human population	Releases of particulate matter (dusts)	Harm to human health - respiratory irritation and illness.	Air transport then inhalation.	Medium	Medium	**Medium**	Local residents may be sensitive to dust. The site is approximately 170m from the nearest residential receptors & there are other workplaces within the Ottery Park Industrial Estate. The GRP shredder has the potential to generate dust emissions but its operation is infrequent.	Adhere to the management system controls through staff training: • Ensure that daily checks for dust are carried out Daily Checks **(MBR-MP-01)** and with an increased frequency in dry weather and when shredder operating and mitigation measures including dampening down employed as required.	**Low**
Local human population	Releases of particulate matter (dusts)	Nuisance - dust on cars, clothing etc.	Air transport then deposition	Medium	Low	**Low**	As above	As above	**Low**
Local human population, livestock and wildlife.	Litter	Nuisance, loss of amenity and harm to animal health	Air transport then deposition	Low	Medium	**Low**	Local residents may be sensitive to litter. The site is approximately 170m from the nearest residential receptors & there are other	There will be a daily walk around and litter pick as part of the Daily Checks **(HUB-MP-01).**	**Low**

Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management?
							workplaces within the Ottery Park Industrial Estate. The waste treatment activities pose a low risk of litter generation.		
Local human population	Waste, litter and mud on local roads	Nuisance, loss of amenity, road traffic accidents.	Vehicles entering and leaving site.	Low	Medium	**Low**	Mud is very unlikely due to the nature of the waste that will be accepted.	As above for litter. No further controls required for mud.	**Low**
Local human population	Odour	Nuisance, loss of amenity	Air transport then inhalation.	Low	Medium	**Low**	Local residents may be sensitive to odour. The site is approximately 170m from the nearest residential receptors & there are other workplaces within the Ottery Park Industrial Estate. Permitted waste types have a low odour potential.	No control measures required.	**Low**
Local human population	Noise and vibration	Nuisance, loss of amenity, loss of sleep.	Noise through the air and vibration through the ground.	Low	Medium	**Low**	Local residents may be sensitive to noise. The site is approximately 170m from the nearest residential receptors & there are other	Planned preventative inspection and maintenance of plant and equipment in line with Environmental Management System.	**Low**

Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management?
							workplaces within the Ottery Park Industrial Estate. The hub site operations will generally be carried out between the hours of 08:00 and 17:00 hrs Monday to Friday with extension to these hours in exceptional circumstances. The site planning permissions does not restrict operational hours. The hired in shredder is potentially noisy but is only used for one day every few months meaning the probability for exposure is low.	If required a Noise & Vibration Management Plan will be implemented.	
Local human population	Scavenging animals and scavenging birds	Harm to human health - from waste carried off site and faeces. Nuisance and loss of amenity.	Air transport and over land	Low	Medium	**Low**	Permitted wastes are unlikely to attract scavenging animals or birds.	No control measures required.	**Low**

Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequences be if this occurs?**	**What is the overall magnitude of the risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of the risk after management?**
Local human population	Pests (e.g. flies)	Harm to human health, nuisance, loss of amenity	Air transport and over land	Low	Medium	**Low**	Permitted wastes are unlikely to attract pests.	As above	**Low**
Local human population and local environment	Flooding of site	If waste is washed off site it may contaminate buildings / gardens / natural habitats downstream.	Flood waters	Low	High	**Medium**	The site is within flood zone 1 has a low probability of flooding from rivers and the sea. There is sufficient containment on site to store fire water in accordance with the Fire Prevention Plan **(HUB-OD-02)**.	Staff training on: Fire Prevention Plan **(HUB-OD-02)** including waste separation, fire watches and maximum pile sizes and following the Fire Procedure **(HUB-SOP-03).**	**Low**
Local human population and / or livestock after gaining unauthorised access to the waste operation	All on-site hazards: wastes; machinery and vehicles.	Bodily injury	Direct physical contact	Low	Medium	**Low**	Site security measures in place: • Heras fencing and an entrance gate; and • Motion sensitive CCTV cameras (at least 3) which will send an alarm to a mobile phone(s). • There will always be a person 'on call' to respond to any alarms – this will either be the Technically Competent Manager	Site security measures will be checked weekly as part of the site Environmental Management System and any repairs made as soon as practicably possible. Weekly Checks **(HUB-MP-02)**	**Low**

Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequences be if this occurs?**	**What is the overall magnitude of the risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of the risk after management?**
							(lives 5 minutes from site) and / or the Nominated Competent Person (lives 10 minutes form site).		
Local human population and local environment.	Arson and / or vandalism causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff, firefighters or arsonists/vandals. Pollution of water or land.	Air transport of smoke. Spillages and contaminated firewater by direct run-off from site and via surface water drains and ditches.	Low	High	**Medium**	As above	As above	**Low**
Local human population and local environment	Accidental fire causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff or firefighters. Pollution of water or land.	As above.	Low	High	**Medium**	Combustible waste is stored and treated on site.	Ensure that the Fire Prevention Plan **(HUB-OD-02)** is adhered to through staff training.	**Low**

Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequences be if this occurs?**	**What is the overall magnitude of the risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of the risk after management?**
All surface waters close to and downstream of site.	Spillage of liquids, leachate from waste, contaminated rainwater run-off from waste e.g. containing suspended solids.	Chronic effects: deterioration of water quality	As above. Indirect run-off via the soil layer	Low	Medium	**Low**	The site sits over 300m away from three tributaries of the Lumburn Brook The site is not within a Drinking Water Protected Areas or a Drinking Water Safeguard Zones for Surface Water. The storage and treatment area for undepolluted vessels is an impermeable surface with sealed drainage. The vessels are only stored in the concrete bays once fully depolluted. The concrete bays drain to an interceptor and then a soakaway.	Adhere to the management system controls: • Ensure that waste is only stored in designated areas in accordance with Daily Checks **(HUB-MP-01)**. • The whole site is checked daily for spillages in accordance with Daily Checks **(HUB-MP-01)**. • Interceptor is checked weekly in accordance with Weekly checks **(HUB-MP-02)** and emptied into IBCs for disposal as required. • Ensure that any spillages are managed in accordance with the Spillage Procedure **(HUB-SOP-02)**.	**Low**

Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequences be if this occurs?**	**What is the overall magnitude of the risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of the risk after management?**
Abstraction from watercourse downstream of facility (for agricultural or potable use).	Spillage of liquids, leachate from waste, contaminated rainwater run-off from waste e.g. containing suspended solids.	Acute effects, closure of abstraction intakes.	Direct run-off from site across ground surface, via surface water drains, ditches etc. then abstraction.	Low	Medium	**Low**	As above	As above	**Low**
Groundwater	Spillage of liquids, leachate from waste, contaminated rainwater run-off from waste e.g. containing suspended solids.	Chronic effects: contamination of groundwater, requiring treatment of water or closure of borehole.	Transport through soil/groundwater then extraction at borehole.	Low	Medium	**Low**	As above. The site is within an area designated as high groundwater vulnerability. The site is outside any Groundwater Source Protection Zone and is not within 50m of any well spring or borehole used for the supply of water for human consumption including private water supplies. The site is not within a Drinking Water Safeguard Zone for Groundwater.	As above	**Low**

Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequences be if this occurs?**	**What is the overall magnitude of the risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of the risk after management?**
Local human population	Contaminated waters used for recreational purposes	Harm to human health - skin damage or gastro-intestinal illness.	Direct contact or ingestion	Low	Medium	**Low**	As above	As above	**Low**
Protected sites - European sites and SSSIs	Any	Harm to protected site through toxic contamination, nutrient enrichment, smothering, disturbance, predation etc.	Any	Low	Medium	**Low**	There are no European Sites and or Sites of Special Scientific Interest within 200m of the site. There are Priority Habitat Inventory and Ancient Woodland sites within 1km of the site boundary as shown in Sensitive Receptor Plan (Ecology) (see Site Plans) but none closer than the area of Purple Moor Grass and Rush Pasture over 550m to the north east of the site. There are no point source emissions to air. Dust will be controlled (see Control of Dust 9.1.1).	Daily Checks for dust **(HUB-MP-01)** and mitigation measures including dampening as required.	**Low**

Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management?
							There are no point source emissions to water.		

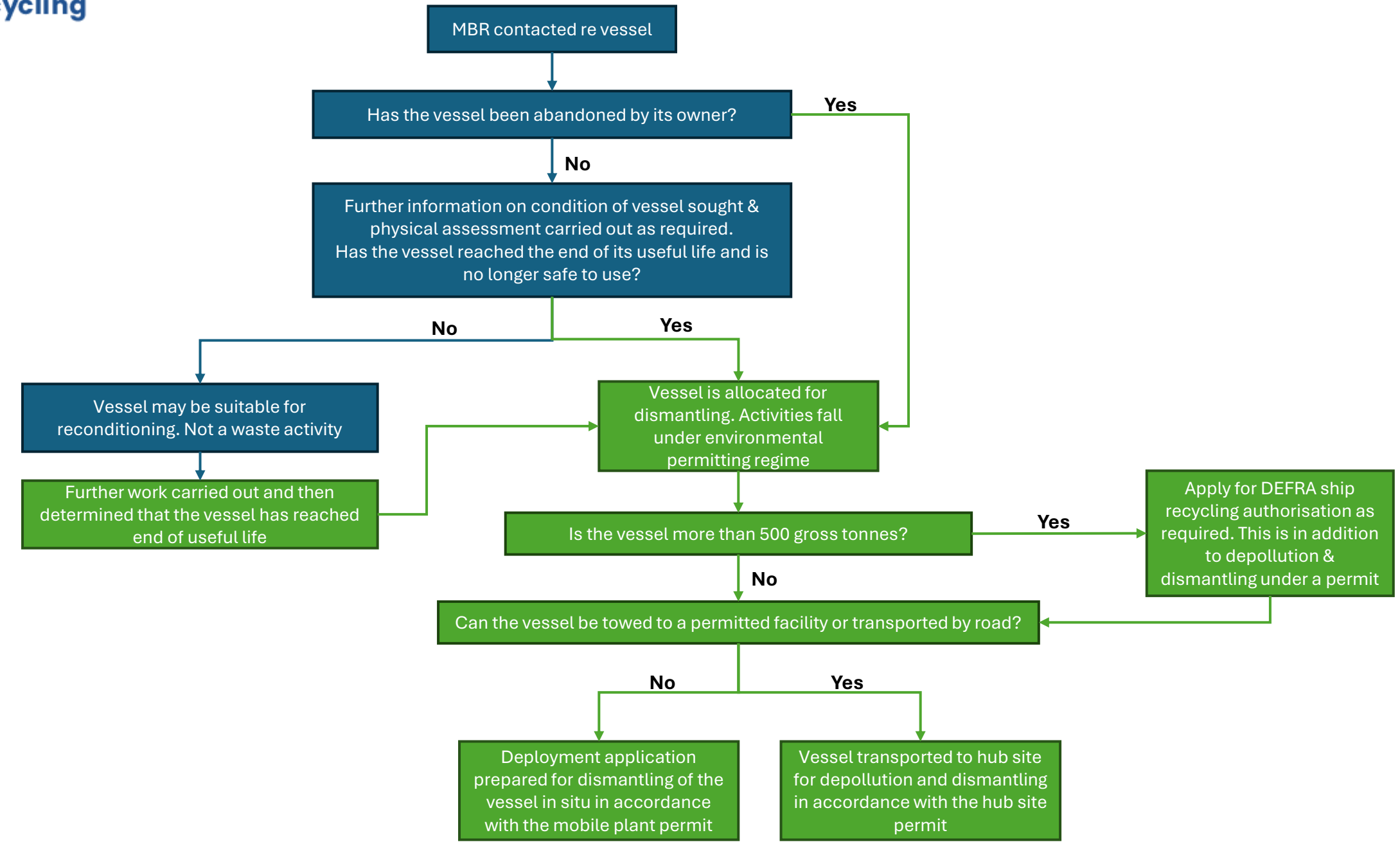
Risk Matrix

Magnitude of Risk	Consequence		
Probability of Exposure	Low	Medium	High
Low	Very Low	Low	Medium
Medium	Low	Medium	Medium
High	Medium	Medium	High

Appendix B - Permitting Decision Tree

Marine & Boat Recycling

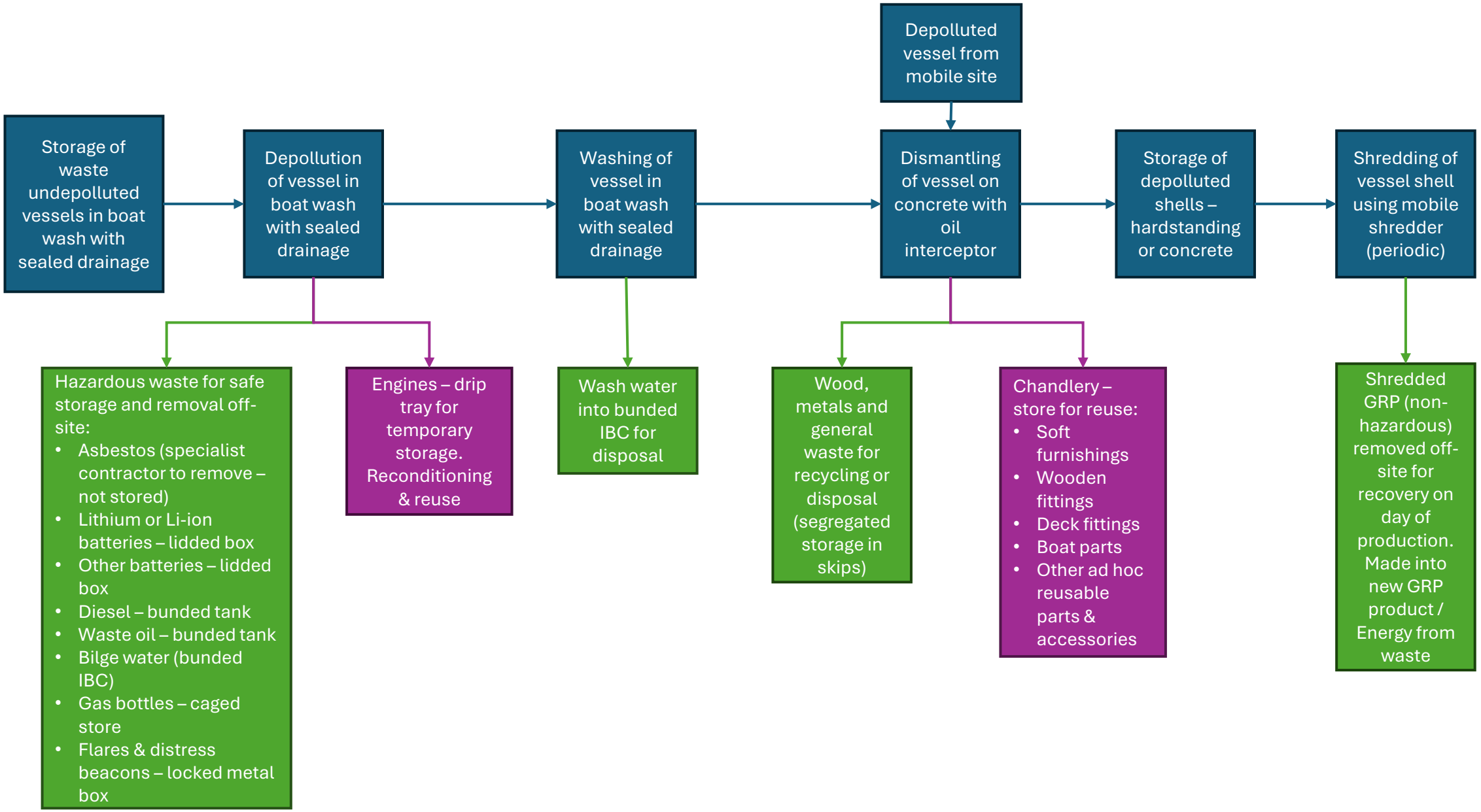
Permitting Decision Flow (MBR-OD-02), V1.0, June 2024



Appendix C - Process Flow Diagram Hub Site

Marine & Boat Recycling

Process Flow Diagram Hub Site (HUB-OD-01), V3.0, September 2025



Appendix D – Process Flow Diagram Mobile Operations

Marine & Boat Recycling

Process Flow Diagram Mobile Site (MOB-OD-01), V1.0, June 2024