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Report No 22004/4A

October 2023

ENVIRONMENTAL MANAGEMENT SYSTEM
For
PHOENIX PARK RECYCLING FACILITY
WALLEND ROAD
PRESTON

Prepared for

PHOENIX PARK NW CIC
Riverside Park
Wallend Road
Preston
PR2 2HW

DOCUMENT CONTROL SHEET

SITE	PHOENIX PARK RECYCLING FACILITY
DOCUMENT TITLE	ENVIRONMENTAL MANAGEMENT SYSTEM
DOCUMENT NO.	22004/4
ISSUED BY	Claire Gettinby (TACCL)
APPROVED BY	Eddie Sloane (Phoenix Park)
REVISION DATE	October 2023
REVISION NO.	A
CHANGES MADE	Original - March 2023 produced for permit application. Rev A - removal of proposed discharge to SW drain for excess surface water following duly making comments from EA.

RELATED DOCUMENTS	
Report No 22004/2	Environmental Risk Assessment
Report No 22004/3	Emissions Management Plan
Report No 22004/1	Site Condition Report

T A B L E O F C O N T E N T S

T A B L E O F C O N T E N T S (cont)

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1. INTRODUCTION

1.1 The Arley Consulting Company Ltd (TACCL) has been commissioned by Phoenix park NW CIC ('the operator') to prepare an Environmental Management System (EMS) for operation of the inert waste recycling facility at Phoenix Park, located in Preston, Lancashire ('the site').

1.2 The EMS document has been prepared in compliance with Condition 1.1.1 (a) of an environmental permit which will require the operator to manage activities in accordance with a written management system.

1.3 The information required in the EMS is provided in a number of documents as detailed in Table 1 below. This document details control measures, procedures and standards for operation of the site according to the environmental permit. It has been prepared following EA guidance, particularly Develop a Management System: Environmental Permits[1].

EMS Element	Contained in	Reference
Site Location	Environmental Risk Assessment	Report No 22004/2
Activities		
Receptors		
Risk Assessment		
Monitoring		
Factory Production Control	EMS (*this document*)	Report No 22004/4
Operational Procedures		
Waste Storage		
Preventative Maintenance		
Accident Management and Contingency Plans		
Complaints Procedure		
Record Keeping		
Review of EMS		
Site Closure		
Site Infrastructure	Site Layout Plan (*appended*)	Drawing No 22004/02
Dust Management	Emissions Management Plan	Report No 22004/3
Baseline conditions at permit issue	Site Condition Report	Report No 22004/1

Table 1: EMS Documents

[1] https://www.gov.uk/guidance/develop-a-management-system-environmental-permits

2. GENERAL SITE OPERATIONS

2.1 Site Activities

2.1.1 The site will accept non-hazardous waste for treatment and recovery as a soil, soil substitute or aggregates. Aggregates will be produced in accordance with the WRAP 'Quality Protocol for the Production of Aggregates from Inert Wastes'. A maximum of 150,000 tonnes will be accepted per annum.

2.1.2 Treatment will comprise one or more of: sorting, separation, crushing, screening, washing and blending.

2.2 Management and Staff Responsibilities

2.2.1 The following staff roles have been identified:

- Technically Competent Manager (TCM)
- Site Manager
- Weighbridge Operator
- Site Operatives

2.2.2 The TCM role is a supplementary role that will be held by the site manager or a nominated person with the appropriate certification.

2.3 Site Layout

2.3.1 The indicative site layout is shown on Drawing No 22004/02 (Appendix C). This is indicative as the site has not yet been constructed.

2.3.2 The waste operations area comprises storage areas for incoming wastes and outgoing products and the treatment plant. The operational area is surrounded by a bund to delineate the area and contain waste and run-off.

2.4 Fuel Storage

2.4.1 Fuel will be stored in a secured, double-skinned tank within the secure site boundary.

2.4.2 Drip trays will be available for use during refuelling and any spillages will be cleaned up immediately in accordance with the Spill Procedure (Section 6.5).

2.5 Site Drainage

2.5.1 There are no natural surface water features within the site. Beneath the site is a surface water drain (CD Drain) which underlies the site in a north/south direction, discharging to the Ribble Estuary some 50 m south of the permit boundary.

2.5.2 Surface water run-off will be directed towards a silt trap interceptor to remove suspended solids and any accidental small scale oil contamination from vehicles and plant.

2.5.3 Water from the interceptor will be stored in an underground storage tank and reused on site for the wash plant and dust suppression. Surplus water will be removed by tanker for off-site disposal.

2.5.4 The area footprint beneath the wash plant will be concreted and laid to a fall with any run-off, drips and spillages drained to a sump in the centre. Contents of the sump will be returned to the wash plant.

2.5.6 The remainder of the site will be compacted hardstanding and used to store incoming waste and processed material. This area will drain towards the interceptor.

2.5.7 The indicative location for the interceptor and emission point is shown on the site layout plan.

3. OPERATIONAL PROCEDURES

3.1 Waste Pre-Acceptance

3.1.1 Customers will be asked to provide information for each waste stream which includes the following:

i. Origin of the waste;

ii. Whether is from a contaminated site; and

iii. European Waste Catalogue Code (EWC).

3.1.2 Only waste types listed on the permit which are uncontaminated will be approved for acceptance. Proposed waste types are listed in Table 2 in section 3.5.2.

3.1.3 For high volume jobs the operator may visit the site of origin to assess the suitability of the waste. If the waste consists only of hardcore or it is from a greenfield site, it can be accepted on the basis of visual inspection. Waste types containing soil from brownfield sites will be assessed based on chemical analyses. Site Investigation reports will be reviewed by the Site Manager (or nominated deputy) in accordance with EA Technical Guidance WM3 to confirm the waste is non-hazardous.

3.1.4 Excavation waste from utilities works can be accepted under RPS 211 without pre-acceptance classification if the excavated wastes are produced by (or on behalf of) utility companies that are members of Street Works UK and:

(i) are from unplanned utilities installation and repair

(ii) would be classified under European Waste Catalogue (EWC) codes:

- 17 01 01 concrete
- 17 01 02 bricks
- 17 01 03 tiles and ceramics
- 17 01 07 non-hazardous mixtures of concrete, bricks, tiles and ceramics
- 17 03 02 non-hazardous bituminous mixtures
- 17 05 04 soil and stones

- 17 09 04 non-hazardous mixed construction and demolition wastes

(iii) would not be classified as hazardous under the producer's company procedures

(iv) are not known or reasonably suspected to be hazardous, for reasons including (but not limited to):

- visible and olfactory presence of hydrocarbons and other chemicals
- waste containing visible pieces of material that contain asbestos
- asphalt (tarmac) road surfaces likely to contain coal tar – for example, those laid in the 1980s or before
- waste from excavations on contaminated sites if previous site investigations identified hazardous waste

3.1.5 Individual loads may be delivered on an ad hoc basis without pre-acceptance information by commercial or domestic customers. Ad hoc loads will be assessed at the weighbridge based on information provided by the customer and a visual inspection. Only loads which are from domestic properties or other non-industrial sources AND which have no visible contamination will be accepted.

3.2 Waste Acceptance

3.2.1 Waste loads will be received at the weighbridge and must be accompanied by a fully completed Waste Transfer Note (or details of a season ticket transfer note).

3.2.2 The Weighbridge Operator will inspect the WTN to ensure the following Duty of Care information has been provided and that it meets all permit and legal requirements:

i. Written description

ii. Quantity / Volume

iii. Carrier registration details

iv. Waste producer details / Site of origin

v. EWC Code

3.2.3 All waste accepted must be:

- Listed on the permit;

- Non-hazardous;
- Suitable for treatment; and
- Accompanied by a correctly completed WTN.

3.2.4 All loads arriving at site must be covered and de-sheeted at the weighbridge to allow inspection by the Weighbridge Operator. The Weighbridge Operator will undertake a visual inspection to confirm that the load is consistent with the WTN information; contains no visible unacceptable constituents; it is not odorous; and that the load will not present a handling problem (eg excessively dusty or wet loads).

3.2.5 If any non-compliances or Duty of Care failures are identified one or a combination of the following actions will be appropriate:

- Unsuitable waste types (ie EWC code not listed on the permit) or a waste description or source which suggests unacceptable contamination (eg uncharacterised soils excavated from a petrol station) will be rejected;
- Minor errors on the WTN may be rectified following discussion with the customer;
- Waste loads which are odorous, not as described or contain more than incidental quantities of unacceptable material will be rejected;
- Problem loads will be referred to the Site Manager who will decide on its suitability;
- Customers may be referred to the Site Manager to ensure full understanding of the waste acceptance standards and improve future compliance (refer to Section 3.1).

3.2.6 Following the satisfaction of all Duty of Care checks the Weighbridge Operator will direct the customer to the waste operations area where the load will be tipped (refer to Section 3.3).

3.2.7 Rejected loads will be managed in accordance with Section 3.4.

3.3 Waste Tipping Procedure

3.3.1 The drivers of all incoming vehicles must comply with site safety rules and follow the instructions of site staff at all times.

3.3.2 The Weighbridge Operator will direct the vehicle to the waste operations area which will be manned by a Site Operative. On instruction from the Site Operative the driver may proceed to tip the load in the designated area.

3.3.3 Loads will be inspected by the Site Operative during tipping and unsuitable loads will be rejected (refer to Section 3.4).

3.3.4 Additional caution will be taken during windy conditions to ensure safe tipping and consider the increased risk of windblown dust. The site will be closed during extreme weather events if conditions become unsafe (eg due to increased instability of high side tippers) or dust emissions cannot be adequately controlled in accordance with the Emissions Management Plan (Report No 22004/3).

3.4 Waste Rejection Procedure

3.4.1 Waste can be rejected at the weighbridge following Duty of Care checks or after it has been inspected once tipped in the waste operation area.

3.4.2 Waste will be rejected in the following circumstances:

- It is not listed on the permit;
- It is unsuitable for processing due to contamination or physical characteristics (eg excessively dusty);
- It is odorous;
- It is hazardous waste; and/or
- It is not accompanied by an accurately completed WTN.

3.4.3 Where possible, rejected loads will be reloaded and removed from site immediately by the haulier.

3.4.4 If the load is rejected after the haulier has left site the waste will be removed to the quarantine area (as shown on Drawing No 22004/02). Customers will be expected to remove the load as soon as can be arranged within 7 days.

3.4.5 The Site Manager will inform the Environment Agency following the rejection of a load if it is hazardous.

3.4.6 A record will be made in the site diary for all rejected loads. Records will include waste load information and details of any actions regarding removal from site or quarantine arrangements.

3.5 Waste Treatment: Factory Production Control (FPC)

3.5.1 WRAP Protocol

3.5.1.1 Waste operations are intended to produce aggregate products which comply with the end-of-waste criteria set out in guidance published by WRAP and the EA (Aggregates from inert waste: End of waste criteria for the production of aggregates from inert waste, October 2013, referred to as the 'WRAP protocol').

3.5.1.2 Aggregates will be considered as having ceased to be waste provided they are produced in accordance with Factory Production Control (FPC), as set out under the relevant BS EN aggregates standard. The FPC for the site is considered to be Section 3.5.

3.5.1.3 Aggregates are considered to be granular material used in construction which does not include clays or soils. The following aggregates will be produced at site:

- Pipe bedding eg. <10mm, <20mm and <40 mm
- Fill sand (<5mm)
- 6F2

3.5.2 Input Materials

3.5.2.1 Waste acceptance procedures (refer to Sections 3.1 to 3.4) are in place to ensure only suitable waste types are used to produce aggregates products in accordance with the FPC.

3.5.2.2 Table 2 lists acceptable waste types by EWC code and includes specific restrictions where necessary.

3.5.2.3 Incidental contaminants (eg soils, peat, clay, silt, wood, plastics, rubber, metal) must be removed during processing.

3.5.2.4 Waste used for the production of aggregates must meet the following criteria:

- Listed on the Environmental Permit;
- Listed in the End of Waste criteria; and
- Must be inert and not contain any dangerous substances (as described in the List of Wastes (England) Regulations 2005).

Waste Code	Description
01 04 08	Waste gravel and crushed rocks other than those mentioned in 01 04 07 *May include excavation from mineral workings*
01 04 09	Waste sand and clay *Must not include contaminated sand*
10 11 03	Waste glass based fibrous material *Waste without organic binders only*
15 01 07	Glass packaging
17 01 01	Concrete *Must not include concrete slurry*
17 01 02	Bricks
17 01 03	Tiles and ceramics
17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02 02	Clean glass Must not include fibreglass or glass fibre
17 03 02	Bituminous mixtures other than those mentioned in 17 03 01 *Only bituminous mixtures from the repair and refurbishment of the asphalt layers of roads and other paved areas (excluding bituminous mixtures containing coal tar and classified as waste code 17 03 01)* *Must not include coal tar or tarred products* *Must not include freshly mixed bituminous mixtures*
17 05 04	Soil and stones other than those mentioned in 17 05 03 *Must not contain any contaminated soil or stone from contaminated sites*
17 05 06	Dredging spoil other than those mentioned in 17 05 05 *Only inert aggregate from dredgings* *Must not contain contaminated dredgings* *Must not contain fines*
17 05 08	Track ballast, soil and stones other than those mentioned in 17 05 07 *Must not contain soil and stones from contaminated sites*
17 09 04	Mixed construction and demolition waste other than those mentioned in 17 09 01, 17 09 02 and 17 09 03 *mixed construction and demolition waste, limited to that generated from utilities trenching, consisting of sub base aggregates, and containing only material that would be described as 17 01 01, 17 03 02 and 17 05 04*
19 12 05	Glass *Does not include glass from cathode ray tubes*
19 12 09	Minerals (eg sand, stones) *Must not contain contaminated concrete, bricks, tiles, sand, stone or gypsum from recovered plasterboard*
20 01 02	Glass *Must not include fibreglass*
20 02 02	Garden and park waste (including cemetery waste) – soil and stones *Must not contain contaminated stones from garden and parks waste*

Table 2: Waste Types Acceptable for the Production of Recycled Aggregates

3.5.2.5 The proposed waste types are aligned with those allowed under the end of waste criteria.

3.5.3 Waste Processing

3.5.3.1 Aggregate processing will be carried out as described below. This is shown diagrammatically in the process flow diagrams contained in Appendix B, but these diagrams are indicative as the wash plant has not yet been purchased.

Washing

i. Soil/stone mixture will be processed through the wash plant
ii. Incidental non-inert material will be picked out (such as wood, plastic and metal) and stored separately for removal off site;
iii. Material will be washed to separate the hardcore;
iv. Hardcore will be passed through various screen decks to produce different fractions;
v. Sand fraction will be separated from the washwater
vi. The remaining soil/water mix will be filtered to produce a clay like filtercake
vii. The filtrate will be returned to the plant for reuse

Dry Processing

i. Hardcore will be crushed to produce particle size of <125 mm to 6F2/5 in line with highways agency specification

3.5.3.2 Aggregate products will be moved to a designated storage area shown on the site layout plan whilst awaiting testing to assess end-of-waste status.

3.5.4 Quality Testing

3.5.4.1 Processed material will be subject to the testing requirements determined by the end use of the aggregate, as set out in the WRAP protocol. Test methods and minimum frequencies for aggregate products can be found in Appendix A. These are based on the following relevant standards:

- BS EN 13242 'Aggregates for unbound and hydraulically bound materials for use in civil engineering work and road construction'
- BS EN 16236 'Evaluation of conformity of aggregates – Initial Type Testing and Factory Production Control'
- Highway Agency Specification for Highway Works Series 600
- Highway Agency Specification for Highway Works Series 700
- Highway Agency Specification for Highway Works Series 800

3.5.4.2 Additional testing may also be required subject to specific customer contract requests. Requirements should be agreed with the customer in advance and outlined at the contract stage.

3.5.4.3 Ongoing data analysis of results will be maintained to assess conformity over time.

3.5.4.4 The implementation of the testing regime is the responsibility of the Site Manager. Testing will be carried out at a UKAS approved laboratory and results will be retained for a minimum of two years.

3.5.4.5 Records will also be made and retained of the following:

- Any concerns raised by purchasers, including test failures;
- Any actions taken to remedy such specific supply issues; and
- Any consequential reviews of the FPC.

3.5.5 Process Control

3.5.5.1 Pre-operational checks will be carried out prior to use of the washing, crushing and screening plant, including a check for size settings to ensure specification requirements can be achieved.

3.5.5.2 Visual checks will be made throughout active treatment operations to monitor for any mechanical issues or output anomalies. Appropriate actions will be taken as soon as possible to rectify any problems.

3.5.5.3 Aggregate products will be inspected before removal to the designated storage area. If any indications of non-conformance are identified (eg incorrect particle size) the equipment will be checked and the material reprocessed. Any equipment defects will be addressed in accordance with preventative maintenance procedures.

3.5.5.4 Any aggregate product which does not meet the required end-of-waste specification will be returned to the storage area and considered for re-processing. Material which cannot be re-processed or is unlikely to achieve the desired specification will remain waste and be removed from site to a suitable waste management facility.

3.5.5.5 The Site Manager will review the FPC and/or Waste Acceptance procedures in the event of recurring failure to meet the end of waste specification.

3.6 Residual Waste

3.6.1 Recovered waste which does not meet the end-of-waste requirements of the WRAP Protocol will be removed under Duty of Care for recovery or disposal at a permitted facility.

3.7 Waste Storage

3.7.1 All incoming wastes, treated waste and aggregate products will be stored in designated areas as shown on Drawing No 22004/02.

3.8 Preventative Maintenance

3.8.1 All plant and machinery will be subject to regular maintenance in accordance with the manufacturer's programmes and schedules and will be subject to statutory inspections.

3.8.2 Daily mobile plant checks will be undertaken by machine operatives; and pre-use checks will be carried out by the Site Manager (or nominated deputy) on all mobile treatment plant prior to its use.

3.8.3 Any minor repairs, maintenance or fuelling of plant and machinery will be undertaken with using a drip tray and a spill kit to hand so any spillage can be contained.

3.8.4 Any major services and repairs required for mobile plant will be conducted off site.

3.9 Housekeeping

3.9.1 Site surfaces will be well maintained and any repairs undertaken as soon as possible in order to minimise noise and dust generation.

3.9.2 A 10 mph site speed limit will be in place and enforced by verbal instruction and signage. All signage will be regularly cleaned and repaired as required.

3.9.3 A wheelwash will be situated on the exit route for use by vehicles exiting the site. The wheelwash will be maintained and regularly cleaned in accordance with manufacturer's recommendations.

3.10 Site Check List

3.10.1 The Site Manager (or nominated deputy) will undertake the required regular checks to ensure site operations are in accordance with the EMS, which will include the following:

- Hoses and connections on wash plant checked for splits, leaks or misconnection

- Visual checks of the interceptor;

- Inspection of site surfaces and roads for damage and/or build-up of debris;

- Dust generation from site surfaces and stockpiles; and

- General housekeeping including any build-up of litter or debris.

3.10.2 A record will be made in the site diary which will include the details of any remedial actions undertaken as a result of routine checks.

4. PREVENTION OF POLLUTION

4.1 Odour

4.1.1 Wastes types accepted at site will be limited to those listed in Table 2 and have a low odour potential.

4.1.2 Odorous wastes will not be accepted and will be removed from site in accordance with the Waste Rejection Procedure (Section 3.4).

4.2 Pests

4.2.1 Waste types accepted at the site will be limited to those listed in Table 2 and are not likely to attract pests such as birds, vermin or insects.

4.2.2 Any incoming loads suspected to have a pest infestation will be removed from site in accordance with the Waste Rejection Procedure (Section 3.4)

4.3 Noise

4.3.1 Noise may be generated on site by incoming and outgoing vehicles; reversing warning alarms; the operation of plant; and material handling.

4.3.2 The following mitigation measures are required in order to ensure the risk of exposure to nearby residential receptors is low:

- Company vehicles and plant will be serviced and maintained in accordance with manufacturer's recommendations;
- All plant and equipment are fitted with silencers where possible;
- Site roads will be well maintained and potholes repaired as soon as possible;
- Daytime working only with no working on Sundays or Bank Holidays.

4.3.3 Any noise complaints arising from external parties or site staff will be investigated by the Site Manager and noise mitigation measures will be reviewed if necessary.

4.4 Mud on Road

4.4.1 The surface of site roads and the waste operations area will be well maintained as hardstanding and repairs carried out as required as soon as possible.

4.4.2 Wheel cleaning equipment will be in place on the outgoing site road for use by vehicles leaving the site.

4.4.3 Roads and site surfaces will be inspected daily as part of the daily checks and recorded in the site diary. A road sweeper will be deployed if any build-up of mud or debris is identified which may lead to deposit off-site.

4.5 Dust

4.5.1 Management Systems are detailed in the Emissions Management Plan, Report No 22004/3.

4.6 Litter

4.6.1 Waste types accepted at site will be limited to those listed in Table 2 and are unlikely to generate windblown litter.

4.6.2 Litter monitoring will be undertaken daily as part of the daily checks and recorded in the site diary. Any litter identified will be cleared by the end of the working day.

4.7 Uncontained Run-Off

4.7.1 The wash plant connections will be checked daily to prevent leaks and spills.

4.7.2 The interceptor will be checked daily for blockages. It will be cleaned out at least annually.

5. TRAINING AND TECHNICAL COMPETENCE

5.1 A technically competent manager (TCM) will be in place to oversee all waste activities.

5.2 The Site Manager will ensure that all operatives at the site are appropriately trained to conduct operations in accordance with permit requirements and the EMS; and identify any additional or ongoing training requirements.

5.3 All drivers of mobile plant, operators of treatment plant and users of ancillary site equipment (eg wheel cleaning facilities) will be fully trained in its correct and safe use to ensure that the operating techniques are undertaken in line with the manufacturers' guidance.

5.4 All relevant training and competency records will be kept in the site office.

6. ACCIDENT MANAGEMENT

6.0.1 Risks from accidents and actions taken to minimise these risks are detailed in the Risk Assessment (Report No 22004/2). In the event that an accident occurs, the following procedures will be followed.

6.1 Breakdown of Equipment

6.1.1 The operator in charge of the equipment notifies the Site Manager of the breakdown. The Site Manager instigates repairs immediately if the breakdown has the potential to cause pollution, eg a fuel leak.

6.1.2 If there is a significant period of breakdown that prevents processing then waste inputs will be suspended to ensure storage capacity at site is not exceeded.

6.1.3 If the breakdown has the potential to increase the risks from dust (eg failure of any suppression equipment) then equipment will be repaired within 24 hours. If key suppression equipment cannot be repaired or replaced within 24 hours, or other failure of the suppression system occurs (eg freezing water), the Site Manager will consider whether to cease processing operations, subject to site conditions at the time.

6.2 Fire

6.2.1 The site does not accept any combustible waste types, therefore the fire risk is considered to be very low.

6.2.2 Fire extinguishers will be available in the site office for use if safe to do so. If the fire cannot be contained then the emergency services must be called without delay.

6.2.3 Any firewater arising will be contained on site by closing the penstock valve on the interceptor .

6.3 Flood

6.3.1 The site is not located in a flood risk area.

6.3.2 In the unlikely event that the site is flooded waste operations (including waste acceptance and processing) will be suspended until flood waters recede. If safe to do so, mobile plant and equipment will be moved to higher ground to minimise any damage.

6.4 Vandalism

6.4.1 Site gates will be locked outside operational hours to prevent access. Mobile plant will be secured when not in use.

6.4.2 Any damage that occurs as a result of vandalism or trespass will be repaired as soon as possible. If, as a result of the damage, there is potential for pollution to occur the Environment Agency will be informed within 24 hours, in accordance with permit conditions.

6.4.3 Security measures will be reviewed following any malicious or repeated occurrences of trespass or vandalism.

6.5 Spillage of Hazardous Material (Oil/ Fuel)

6.5.1 To minimise the risk of spillage diesel will be stored in a double skinned tank, and all hazardous liquids (ie oils, lubricants etc) will be stored in adequately bunded containers.

6.5.2 In the event of a spillage immediate steps should be taken stop any active leaks (eg close any valves or stand up fallen containers). PPE must be used in accordance with any available safety data sheets. As a minimum gloves must be worn.

6.5.3 Small scale spillages of oil or fuel (less than 5 litres) will be cleaned up immediately using absorbent material, as contained within a spill kit to be located as shown on Drawing 22004/02 in Appendix C.

6.5.4 In the event of a larger scale incident the spillage may be contained using site-derived soil/clay/sand material (as available) which will be placed using site mobile plant. Contaminated materials will be sampled and analysed prior to recovery or disposal off-site.

7. INCIDENTS AND COMPLAINTS

7.1 Any incidents are recorded in the site diary. This includes non-conforming loads or part loads, problems or breakdown of equipment or abnormal events.

7.2 Complaints may be received via the local authority, EA, neighbours, customers or members of the public. All complaints and incidents will be dealt with promptly, efficiently and in a courteous manner in order to maintain good relationships with customers and neighbours.

7.3 The Site Manager (or nominated deputy) will investigate all complaints within 24 hours. Firstly, complaints will be substantiated and confirmed (or otherwise) to be related to site operations. If necessary, rectifying action will be determined and implemented. A response will be reported back to the complainant as soon as possible.

7.4 A record of incidents, accidents or non-conformances should be kept in the site diary which includes the following information:

- Date and time of incident
- What happened
- What caused it
- Details of any contamination
- Who was involved
- What action was taken
- Were external agencies involved
- Any changes that have been made to the procedures/ EMS to ensure the incident does not reoccur

8. SECURITY

8.1 The site will be fully enclosed by palisade fencing and security gates. The Phoenix Park entrance is secured with electronic security gates.

8.2 The integrity of the gates and fencing will be checked regularly by the Site Manager (or nominated deputy) and recorded in the site diary.

8.3 During non-operational hours the site will be monitored by CCTV.

9. RECORDS AND REPORTING

9.1 Records will be kept either in the site office or in a secure location off-site if storage space is unavailable. Records include pre-acceptance and acceptance information, site diaries, maintenance records, training records, EMS review records and duty of care documentation for incoming and outgoing material.

9.2 Waste returns will be reported quarterly to the EA in accordance with the permit condition.

9.3 Incidents causing permit breaches or significant pollution will be notified to the EA within twenty four hours in accordance with permit requirements.

9.4 A copy of the EMS is kept in the site office and communicated to any other site operatives as part of their induction to the site.

10. CLOSURE

10.1 If operations cease at the site, and the permit is not transferred to a new operator, waste operations will go into closure. All waste will be removed from site. Plant and machinery will also be removed. A permit surrender application will be submitted to the EA.

11. EMS REVIEW

11.1 The EMS will be reviewed annually, and a document control sheet maintained which details any changes made.

11.2 The EMS will also be reviewed as follows:

- If the site is subject to a permit variation;
- If there is an accident or significant breach of permit conditions;
- If there is a new environmental issue, and any new control measures put in place; and
- If there are any major changes to site operations.

APPENDIX A

Test Methods and Minimum Frequencies under the WRAP Protocol

Notes:

1. Testing frequency is based in terms of 'production week' and/ or 'production day' and depends on throughput at the time; a production week is defined as five production days or the period taken to complete five production days.

2. Testing frequencies should be increased where variability is identified through factory production control and where measured values are close to specified limits.

List of Tables

All End Uses

Property	Minimum Test Frequency	BS Test Reference	Standard and Specification
Particle Size Distribution (grading)	1 per week	BS EN 933-1 (2012)	WRAP BS EN 13242 BS EN 12620
Particle Density	1 per month	EN 1097-6	WRAP BS EN 13242 BS EN 12620
Resistance to Fragmentation (Los Angeles Test)	2 per year	EN 1097-2	WRAP BS EN 13242 BS EN 12620
Classification of constituents	1 per month	BS EN 933-11	WRAP BS EN 13242 BS EN 12620
Water soluble sulphate	1 per month	BS EN 1744-1	WRAP BS EN 13242 BS EN 12620

Table I: Test Methods and Frequency for All End Uses

Class 6F2: Selected Granular Material (coarse grading)

Property	Minimum Test Frequency	BS Test Reference	Standard and Specification
Particle Size Distribution (grading)	1 per week	BS EN 933-1 (2012) or BS 1377 Part 2 (1990)	WRAP BS EN 13242 BS EN 12620 Highway Specification 600
Particle Density	1 per month	EN 1097-6	WRAP BS EN 13242 BS EN 12620
Resistance to Fragmentation (Los Angeles Test)	2 per year	EN 1097-2	WRAP BS EN 13242 BS EN 12620
Classification of constituents	1 per month	BS EN 933-11	WRAP BS EN 13242 BS EN 12620 Highway Specification 600
Water soluble sulphate	1 per month	BS EN 1744-1	WRAP BS EN 13242 BS EN 12620

Table II: Test Methods and Frequency for Recycled 6F2

Unbound Mixtures for sub-base: Type 1

Property	Minimum Test Frequency	BS Test Reference	Standard and Specification
Particle Size Distribution (grading)	1 per week	BS EN 933-1 (2012) or BS 1377 Part 2 (1990)	WRAP BS EN 13242 BS EN 12620 Highway Specification 800 (801/1) BS EN 13285
Particle Density	1 per month	EN 1097-6	WRAP BS EN 13242 BS EN 12620
Resistance to Fragmentation (Los Angeles Test)	2 per year	EN 1097-2	WRAP BS EN 13242 BS EN 12620 Highway Specification 800 (801/4)
Classification of constituents	1 per month	BS EN 933-11	WRAP BS EN 13242 BS EN 12620 Highway Specification 800
Water soluble sulphate	1 per month	BS EN 1744-1	WRAP BS EN 13242 BS EN 12620 Highway Specification 800 (801/2) BS EN 13285
Resistance to Wear (Micro Deval Test)	Annually	EN 1097-1: 1996	Highway Specification 800 (801/4)
Water Absorption	Annually	EN 1097-6: 2000	Highway Specification 800 (801/4)
Resistance to Freezing and Thawing (Magnesium sulphate soundness)	Annually	EN 1367-1: 1998	Highway Specification 800 (801/4)

Table III: Test Methods and Frequency for Type 1 Unbound Mixture

Grit/ sand

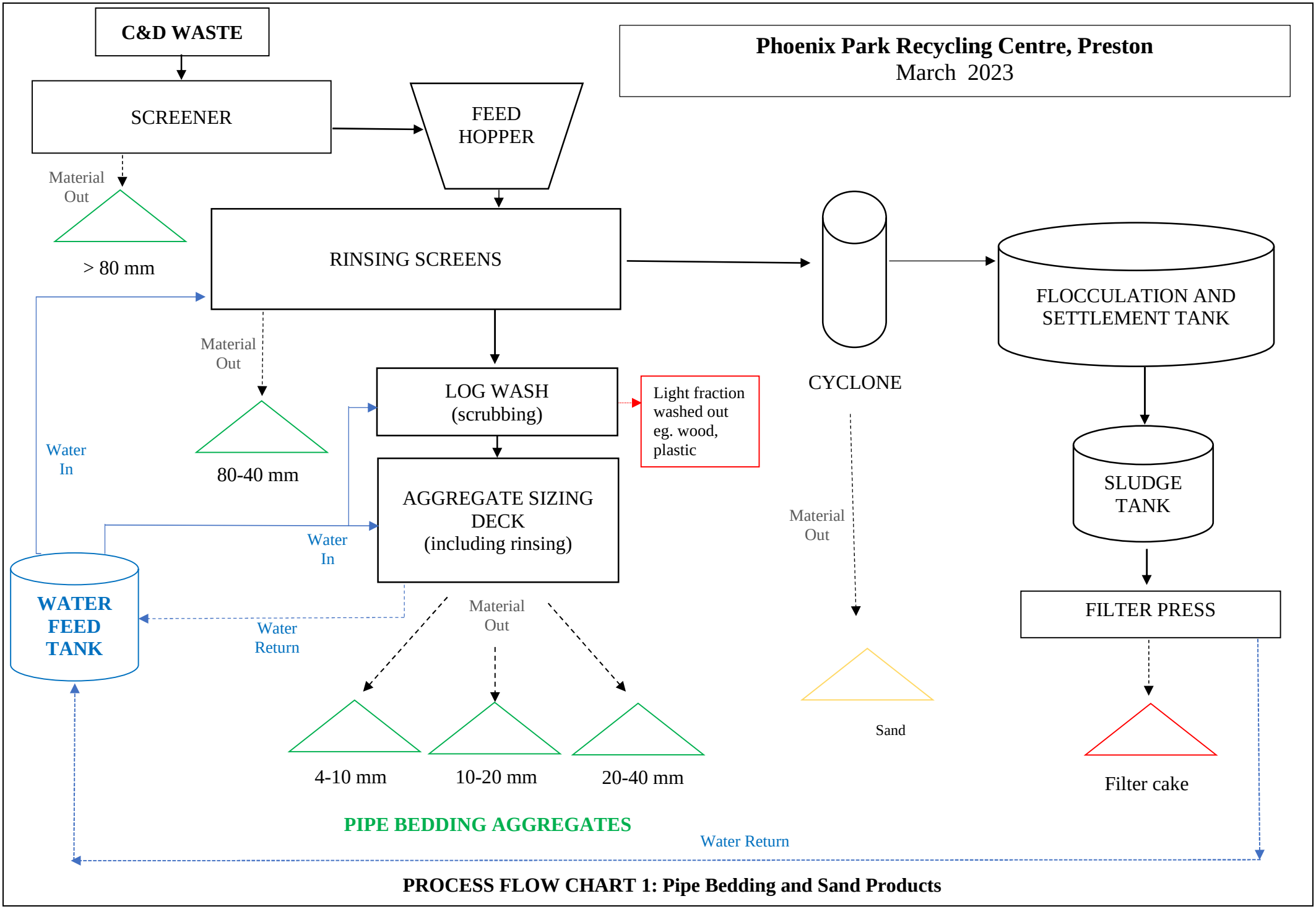
Property	Minimum Test Frequency	BS Test Reference	Standard and Specification
Particle Size Distribution (grading)	1 per week	BS EN 933-1 (2012) or BS 1377 Part 2 (1990)	WRAP BS EN 13242 BS EN 12620
Water soluble sulphate	1 per month	BS EN 1744-1	WRAP BS EN 13242 BS EN 12620

Table IV: Test Methods and Frequency for Grit/Sand

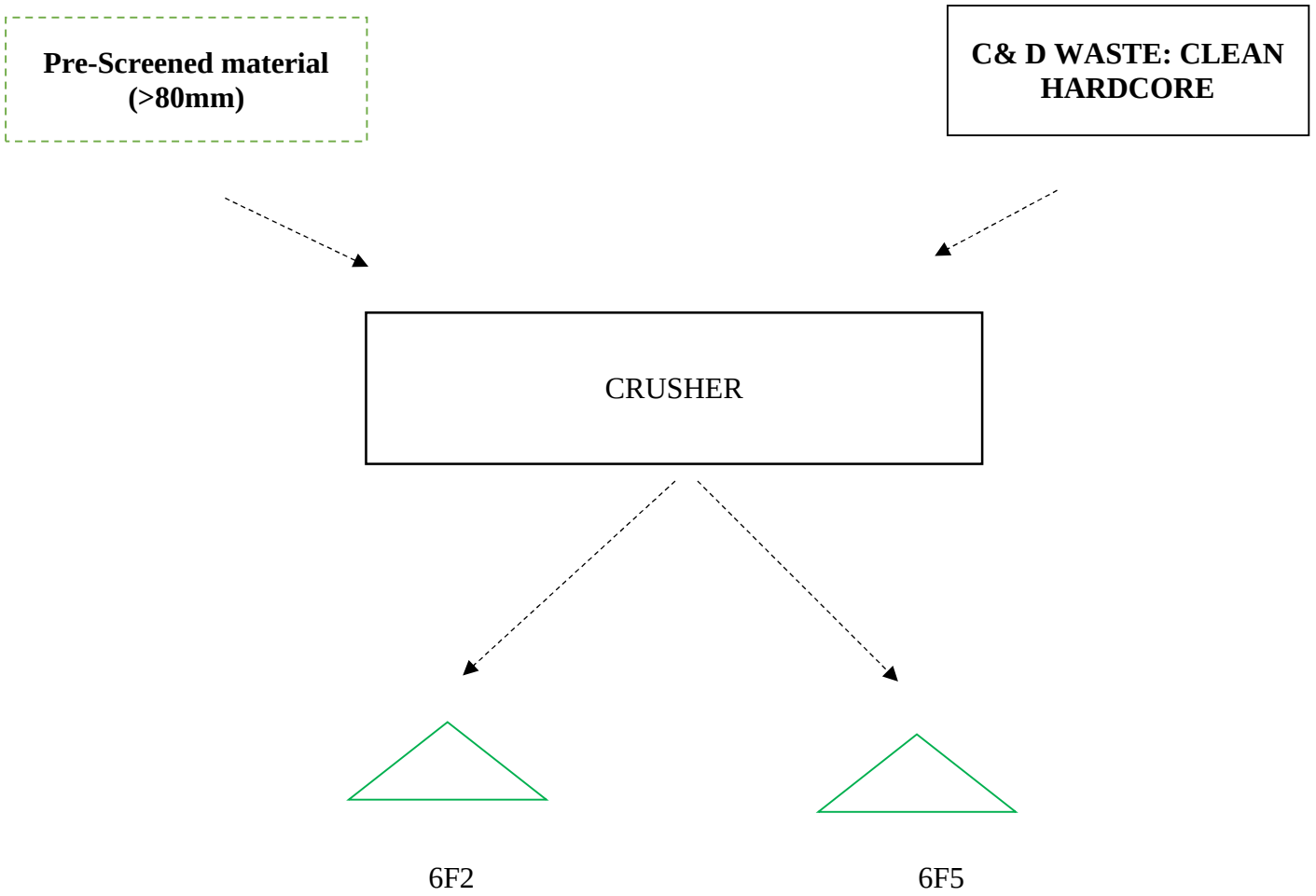
Notes:
Grit/ sand is not specified in the Highway Series as an aggregate product, therefore these requirements are based on TACCL's geotechnical and engineering experience.

APPENDIX B

Process Flow Charts



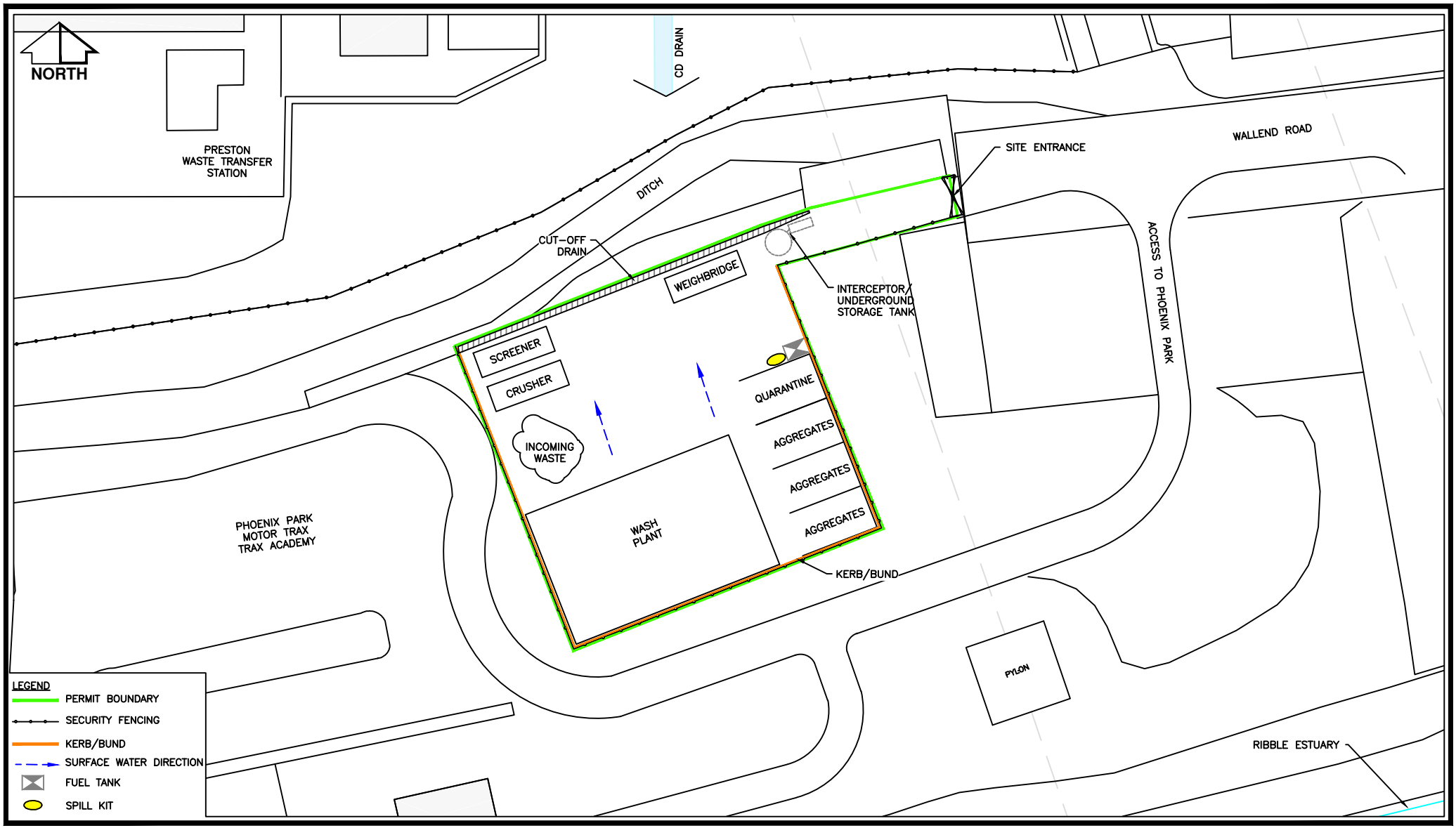
PROCESS FLOW CHART 1: Pipe Bedding and Sand Products



PROCESS FLOW CHART 2: Production of 6F2/5

APPENDIX C

Drawings



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CLIENT: PHEONIX PARK NW CIC		DRAWN BY. M.Y.B.	APPROVED BY. C.G.
JOB TITLE. PHOENIX PARK RECYCLING FACILITY		DATE. 16/12/2022	DRAWING No. 22004/02
DRAWING TITLE. INDICATIVE SITE LAYOUT PLAN		SCALE @ A4. 1:500	

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