Cook & Son,
Rowley Farm Materials Yard,
Crawley, West Sussex:

Environmental Management System

Version D, Dec. 2024

Contents

1 Introduction

1.1 Scope

This Environmental Management System (EMS) is for the waste material processing operation being carried out by Cook and Son Ltd at Rowley Farm, West Sussex. The operation was permitted in 2012, under Environmental Permit No. EPR/EB3135RZ; pursuant to *Standard Rules SR2010No.12 - Treatment of waste to produce soil, soil substitutes and aggregate*.

1.2 Document History

Version A of this EMS was produced following the issue of the Permit in 2012. Version B of this EMS was produced to accompany the variation of the Permit, in 2022, to add soil washing to the permitted processes (variation application withdrawn). Version C was produced to address the comments/requirements stated in the Compliance Assessment Report (CAR ID:103736/0428693) dated 09 July 2022. Version C amendments are shown in blue text. Version D amendments in green text.

1.3 EA Guidance

This EMS has been produced in accordance with EA online Guidance "Non-hazardous and inert waste: appropriate measures for permitted facilities".

It is noted that the yard at Rowley Farm is operated under a Standard Rules Permit and is therefore a relatively small and low risk waste operation. Additionally, the waste types used at the yard are predominately 'inert' soils, stones and other solid/granular materials. These materials are not biodegradable, not flammable and do not emit an odour. Impermeable working areas are not required and the materials can be stored in 'simple' open bays (enclosed storage and/or tanks are not required). This is not altered by the conversion to a Bespoke Permit including the amendment of **EWC 19 12 12** and the addition of **EWC 17 09 04**.

Similarly, the treatment process is (physically) crushing and screening the waste materials and is therefore equally simple. The treatment process does not produce any point source emissions, so many of the measures described in the guidance (and suggested management plans) are not applicable to the operation at Rowley Farm.

Fugitive emissions (such as mud, dust and litter) are potentially present at the site and are therefore addressed in this EMS. Appropriate mitigation and management measures are described in the table contained in Section 3.

This EMS therefore details the 'appropriate measures' that are specific and relevant to the operation at Rowley Farm.

2 Site Operation

The materials yard at Rowley Farm is primarily operated to receive, process and export soil, concrete, hardcore and bituminous materials, however, other materials may be stored/processed from time to time. Only waste materials permitted under the Environmental Permit shall be imported to the yard. A list of the permitted waste types is stated in the list of permitted wastes, provided in Appendix A of this EMS.

Pursuant to the rules of the Environmental Permit, the quantity of waste that can be stored and processed at the site shall be no more than 75,000 tonnes per year.

2.1 Source Sites

The imported waste materials will come from a number of source sites. All potential source sites shall be reviewed to determine whether the materials are of a type(s) permitted under the Permit and whether there is any reason to expect high levels of contaminants. Where there is no reason to suspect the source site to be contaminated, permission shall be granted for the material to be imported

Where the source site has a potential to be contaminated, further information shall be requested. Source sites will be requested to provide the following information:

- site address
- source of the waste
- EWC
- current and/or previous use of the site
- details of any treatment used to remove unsuitable waste
- results of any waste tests

This information will typically be in the form of site investigation data/reports, including chemical soil testing. The soil test results will be checked and, if the test results are acceptable, the source site shall be permitted to import material to the yard. Where test results indicate unacceptable levels of contaminants, the source site shall be rejected and no material permitted. A record of source site data shall be maintained.

2.2 Delivery of Materials

Deliveries shall only be accepted by prior arrangement and all delivery vehicles shall report to the site manager/foreman upon arrival at the yard.

All waste materials delivered to site shall be accompanied by a Controlled Waste Transfer Note. Waste producers and/or hauliers will be requested to include the following details in their description of the waste:

- the waste classification code (EWC)
- whether it's hazardous or POPs waste
- the type of premises or business where the waste was produced

- the name of the waste
- the process that produced the waste
- a chemical and physical analysis of the waste (If necessary)
- any special problems, requirements or knowledge related to the waste

Waste Transfer Notes will be collected upon arrival to the site and retained in accordance with the Permit,

Only permitted waste types shall be accepted and non-permitted waste types shall be rejected/returned to the producer. Materials shall be visually inspected when they arrive at the yard. Unsuitable materials shall be rejected, or quarantined and promptly removed. Materials will be deemed unacceptable if they:

i. do not match the accepted description
ii. there is suspicion that they are chemically unsuitable
iii. contain excessive deleterious material

Quarterly Returns shall be prepared and submitted to the EA, summarising the deliveries received in each quarter.

2.3 Storage and Processing

Upon arrival of each delivery, the type of waste shall be identified and the delivery shall be unloaded in one of the following designated storage areas:

- Hardcore
- Bituminous materials
- Concrete – crushed
- Topsoil

Materials shall be visually inspected before processing. Any loads containing incidental (minor) physical contaminants shall be acceptable for processing. However, any loads containing major physical contaminants shall be rejected, or quarantined and promptly removed.

Most incidental/minor physical contaminants (such as wood, metal and plastic) shall be removed from the stockpiles before processing and removed from site for separate recycling/disposal. These materials shall be recycled/disposed of by registered waste carriers and/or receivers and documentation shall be retained.

Crushing and screening of the materials shall be undertaken within the designated area using the appropriate plant. Once processed, materials shall be stockpiled in designated bays/areas until export. Stockpiles shall not exceed 4m in height.

Recycled aggregates shall be produced in accordance with the WRAP Protocol. Further details of these procedures are described in the “Recycled Materials: Quality Protocol” provided in Appendix B of this EMS.

2.4 Maintenance

Crushing and screening plant shall be maintained in accordance with the manufacturer's recommendations. Plant shall be checked prior to operation and any repairs shall be undertaken by suitably experienced personnel.

General maintenance of the yard shall be carried out regularly using the Maintenance Checklist provided in this section. All maintenance, repairs and checks shall be recorded using the Maintenance Record Sheet also provided at the end of this Section.

A plan showing the extent of the site is provided in Appendix C.

2.5 Maintenance Checklist

General maintenance checks shall be undertaken regularly and recorded on the form below.
Fill in a date at the top of the column and tick the checks undertaken on that date (see example in first column)

Item requiring maintenance/ checking	Completed by	Date of Check													Comment or action
		99/99/99													
Check fences and gates (to avoid vandals or children getting in).		✔													
Visually check the un-surfaced areas to ensure that there are no spills. Clean up if necessary.		✔													
Check bunds to make sure they aren't damaged or leaking.		✔													
Visually check yard run-off not entering ditch. Clean ditch, if necessary.		✔													
Visually check litter stockpile (below screener conveyor belt) and remove, as necessary.		✔													

2.6 Repair/Maintenance Record Sheet

Specific repairs, servicing or maintenance shall be recorded on this table.

Item	Completed on	Completed by	Details of repair or maintenance undertaken

3 Potential Pollution Risks

Potential pollution risks associated with this operation have been identified in the Risk Assessment (Ref. RF/013). The Risk Assessment has been used to identify 'site specific' pollution risks along with the appropriate management actions to control these risks.

3.1 Risk Management Actions

The following table provides a summary of the potential risks and the site specific management actions that shall be implemented:

Potential Pollutant	Management Action
Dust	Dust produced by delivery vehicles shall be reduced by regularly maintaining haul roads and delivery areas. The wind direction and moisture content of the stockpiled material shall be considered before crushing and/or screening is carried out. During periods of dry weather, visual inspections (at the boundary of the site) shall be carried out to monitor dust. When necessary, dust shall be suppressed by damping down (using the on-site sprinkler system).
Mud on local roads.	To reduce the risk of mud reaching the local roads, the internal access road shall be regularly cleaned. In the event that mud does reach the local roads, it shall be promptly cleared using a road sweeper.
Waste/ litter	Litter is removed from the screening belt by a blower and is blown in to a stockpile, on the ground below. This stockpile is in a walled area with netting on top of the wall to increase its height and improve its effectiveness at preventing litter from being disbursed across the site, in windy conditions. This stockpile will be regularly monitored during the treatment process and cleared/removed, as necessary. In addition, the wider site shall be regularly inspected for litter that may have been blown across the site or been generated by other general activities on the site. Any such litter/ waste/ debris emanating from the site shall be promptly cleared from any affected area.
Noise and vibration	Plant shall be maintained and silenced to reduce excessive noise and/or vibration. Operation of the plant shall typically be limited to within the 'normal working day'.
Unauthorised access, arson and/or vandalism	Gates shall be locked when the site is closed. All plant shall be locked and made secure outside of working hours. The site boundary fence shall be regularly checked and maintained.
Surface water	The yard is surrounded by perimeter bunds/walls and these shall be regularly checked and maintained to prevent surface water leaving the site. A ditch runs along the northern boundary of the site. The surface of the yard slopes away from the ditch preventing surface water run-off entering the ditch. The ditch shall be regularly checked to ensure that surface water or potential pollutants have not entered the ditch. If necessary, the ditch shall be cleared.
Spillages (e.g. Fuel)	Fuel shall be stored in bunded tanks. Any spillage during re-fuelling shall be promptly cleared.

4 Accident, Incidents and non-conformances

Accidents, incidents and near misses which could affect the operation of the yard or cause harm to the environment shall be recorded on the form provided in this Section. The cause(s) shall be investigated and, where possible, measures put in place to prevent or minimise re-occurrence.

Non-conformances to the rules in the Environmental Permit or where this EMS has not been implemented correctly shall also be recorded. A form is provided in this Section.

4.1 Accident/ Incident Record Sheet

Date and time of the incident	
What happened, what was it about?	
Was anyone else aware of this – other witnesses? If so who?	
What caused it?	
What action did you take to fix the problem? Were external agencies involved?	
What have you done to make sure that it does not happen again?	
Was there any significant pollution – for example: oil entering a surface water drain. If so what?	
If there was then you must notify the Environment Agency on 0800 807060 ASAP. Have you done so?	Yes/No/not applicable Time: Date: E.A Incident number:
Please print your name and sign	

4.2 Record of non-conformances

Date and time non-conformance identified	
What happened, what was it about and what permit condition does it relate to?	
What caused it?	
What have you done to make sure that it does not happen again?	
Have you reviewed the EMS and rolled out any changes to operations and procedures? Include dates.	
Was there any significant pollution – for example: oil entering a surface water drain. If so what?	
If there was then you must notify the Environment Agency on 0800 807060 ASAP. Have you done so?	Yes/No/not applicable Time: Date: E.A. Incident number:
Please print your name and sign	

5 Personnel and Training

The operation shall be managed by competent personnel, who shall be responsible for implementing the rules of the Permit and this EMS. William Smith holds a WAMITAB qualification and is responsible for the management of the operation.

The day-to-day operation of the yard shall be carried out by a competent Site Manager/Foreman and/or Operatives. They shall be primarily responsible for operating the plant and carrying out the processing of waste materials. They may be responsible for other tasks, as instructed by the above managers.

Personnel shall receive clear instructions and, where necessary, training shall be given to enable the instructed task/responsibility to be undertaken.

A record of training shall be kept on the following form:

(see next page)

Site personnel will be regularly reminded of their responsibility to follow the procedures and to check the materials arriving at the yard. This will be achieved by Toolbox Talks.

Staff carrying out waste acceptance checks, including sampling, will be appropriately trained and competent to:

- classify and characterise the waste
- identify whether it is suitable for use
- manage any loads that do not conform to the waste acceptance criteria
- determine end of waste products

Toolbox Talks will be held by the WAMITAB Competent Site Manager. These will be held on a monthly basis and all site staff will attend. Staff will be reminded of the procedures and any issues/incidents will be discussed, so that improvements can be made on a regular basis. A record of the Toolbox Talks will be kept.

5.1 Personnel Training Record Sheet

Name	Job Title	TRAINING RECEIVED (tick boxes to show training received)																			COMMENTS
		Environmental awareness							Operations/maintenance						Accidents and emergency						
		Competence qualification (WAMITAB)	Supervision of waste management sites	Environmental permit awareness	Waste receipt incl. Duty of Care	Waste separation and storage	Awareness of potential pollution risks		Operation of mechanical plant	Maintenance of mechanical plant	Carry out Maintenance Checklist	Prepare Quarterly Returns			Fire procedure	Fuel spillage procedure					
C.Cook	Director		√	√	√	√	√					√			√	√					
C.Cook Jnr	Site Manager		√		√	√	√								√	√					
W.Smith	Foreman	√	√	√	√	√	√								√	√					
	Operative																				

6 Complaints

All complaints shall be investigated and, where practicable, actions to rectify any problems shall be implemented. Each complaint and any action taken to remedy it shall be recorded using the form contained in this section and shown to the Environment Agency when they visit the site.

6.1 Complaints Record Sheet

Who made the complaint? Name:	
Address	
Phone No	
Date and time they made the complaint	
What happened, what was it about?	
Was anyone else aware of this – other neighbours or your staff? If so who?	
Assuming the complaint relates to your site, what was the problem, what went wrong? If you can't find the source of the problem you should contact a suitably qualified person to do so and record who they were and what the problem was.	
What have you done to make sure that it does not happen again?	
Was there any significant pollution – for example: excessive odour which can be smelt off site or spillage of untreated sewage onto the ground into a drain or a watercourse? If so the Environment Agency must be informed.	
If there was then you must notify the Environment Agency on 0800 807060 ASAP. Have you done so?	Yes/No/not applicable At what time did you phone?
You must also write or send an email to confirm this to the local office (see your accident management plan for the address). Have you done so?	Yes/No/not applicable Time: Date: EA incident number:
Please print your name and sign:	

Appendix A
List of Permitted Wastes

Appendix B

Recycled Materials: Quality Protocol

Cook & Son, Rowley Farm Materials Yard, Crawley, West Sussex

Recycled Materials: Quality Protocol

Draft

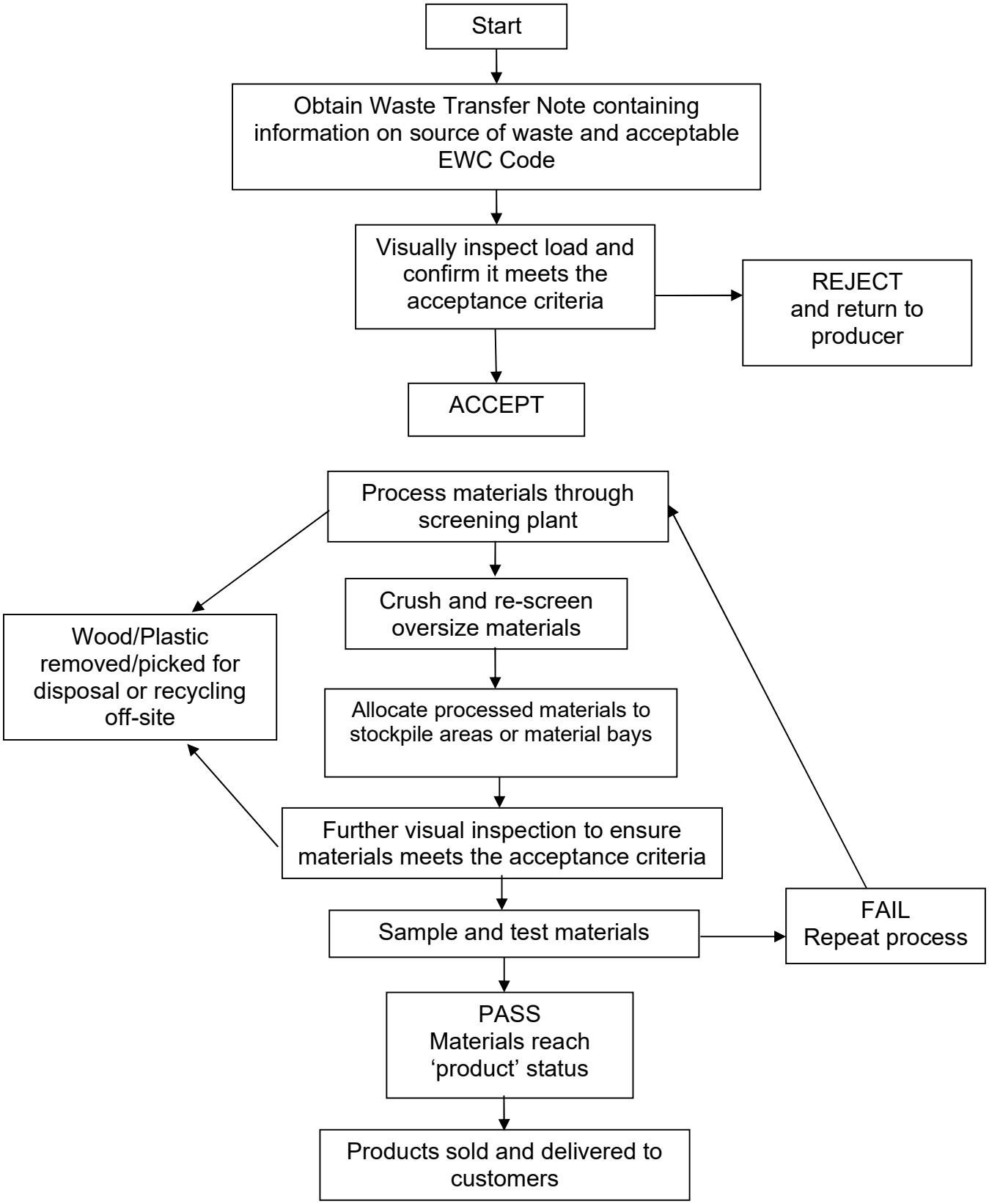
1. Introduction

This document describes the procedures required to comply with the WRAP Quality Protocol for recycled aggregate. In order to meet 'end of waste criteria' the materials must be produced in compliance with the criteria outlined in this document (and the WRAP Protocol) and should be destined for use in the designated market sector.

This document contains the following sections:

2. Flow Chart

The following flow chart shows the procedure for the acceptance and processing of the waste materials to produce the specified products.



3. Factory Production Control

Responsibility and Authority

1. Recycling manager/Management Representative: Will be responsible for ensuring the requirements of the protocol are implemented and maintained.

2. Site Manager: Responsible for the day-to-day running of each production site.

3. Production operatives: Ensure that the work carried out is to the protocol and are instructed by the site manager.

Internal Audits

These will be carried out by the Recycling Manager, every 6 months. The information will be stored and kept for a minimum of 2 years and will be available to all customers on request.

Management Review

This will be carried out annually or as appropriate with the introduction of new or amendment to existing legislation.

Sub-Contract Services

Any Sub-contract services employed by the company will be expected to adhere to this protocol and will be issued with a copy of this protocol prior to work commencing.

Records

Refer to 3.6, 3.7 and 3.9

Training

All personnel involved in the process will be trained to conform with the protocol and other relevant legislation. Appropriate training records will be kept and maintained. Only suitably qualified personnel will be allocated assigned tasks in the protocol.

Control procedures

Refer to Flow Chart in Section 2, plus the procedures described below.

Permitted Facility

Excavated material from various locations will be delivered to the recycling facility, which will operate under a EPR Waste Permit, issued by the Environment Agency.

Incoming Waste

Acceptance Criteria:

1. Registered Waste carrier enters the recycling facility and submits a waste transfer note. Waste should only be accepted from Registered Waste Carriers with correctly completed notes..
2. A visual inspection is made on the load to ensure that it matches the waste transfer note and that the correct EWC code has been used to categorise the load.
3. If the material does not match the description on the waste transfer note it is rejected and the company delivering the load notified of this action.
4. The load is then unloaded where a second visual inspection is made to check that the waste matches the description on the Waste Transfer Note. If it does not the load is rejected and the company delivering the load notified of this action.
5. The accepted load will now be stockpiled awaiting processing.
6. The waste transfer note is then stored and kept for a minimum of 2 years.

Only the following European Waste Codes will be accepted:

17.01.01. Concrete
17.01.02. Bricks
17.01.03. Tiles and Ceramics
17.01.07. Mixed Concrete, brick, tiles and ceramics, not containing dangerous substances.
17.03.02. Bituminous Material not containing dangerous substances
17.05.04. Soil & Stones, not containing dangerous substances
17.05.06. Dredging spoil, not containing dangerous substances
17.05.08. Track Ballast, not containing dangerous substances
17.09.04. Mixed construction waste comprising 17.01.01., 17.03.02 and 17.05.04.
20.02.02. Garden and Park Waste - Soil & Stones, not containing dangerous substances

Note: Additional EWC Codes permitted into the Recycling Facility are listed in the Standard Rules Permit.

A record of each load delivered and accepted shall be entered on the waste acceptance/delivery note and retained providing the following information:

a) date
b) nature and quality
c) place of origin
d) quantity by weight
e) carrier
f) supplier

Outgoing Products

6F2 Recycled Concrete and Brick
Type 1 Recycled Aggregate
Type 2 Recycled Aggregate
Recycled Tarmac

Method of Production

6F2 Recycled Concrete and Brick

1) Suitable materials will identified
2) The material will be screened to <100mm
3) Oversized material will be crushed and re-screened
4) The finished product will then be stockpiled in the appropriate bay/area.
5) Product will be tested
6) Compliant product will be sold for use in the construction industry

Type 1 Recycled Aggregate

1) Suitable materials will identified
2) The material will first be screened to <100mm
3) The material will first be screened to <25mm
4) Oversized material will be crushed and re-screened
5) The finished product will then be stockpiled in the appropriate bay/area.
6) Product will be tested
7) Compliant product will be sold for use in the construction industry

Type 2 Recycled Aggregate

1) Suitable materials will identified
2) The material will be screened to <100mm
3) Oversized material will be crushed and re-screened

4) The finished product will then be stockpiled in the appropriate bay/area.
5) Product will be tested
6) Compliant product will be sold for use in the construction industry

Recycled Tarmac

1) Suitable materials will identified
2) The material will be screened to <10mm
3) Oversized material will be crushed and re-screened
4) The finished product will then be stockpiled in the appropriate bay/area.
5) Product will be tested
6) Compliant product will be sold for re-use in tarmac operations

Inspection and Control of Process Equipment

Screeners, crushers and excavators associated with the production of the recycled materials will be inspected and maintained regularly. Inspections will be carried out weekly by the operators and maintenance will be carried out in accordance to the manufacturers recommendations.

Inspection of Products

The composition and constituents of each product will be inspected regularly throughout the production process.

Testing

Product compliance testing will be carried out at varied frequencies depending on the test to be conducted. Refer to the following Test schedule:

Test	Test Reference	Frequency
Particle Size Distribution	EN 933-1	1 per week
Particle Density	EN 1097-6	1 per month
Classification of Constituents	EN 933-11	1 per month
Water soluble sulphate	EN 1744-1	1 per month
Resistance to fragmentation (Los Angeles Coefficient)	EN 1097-2	1 per six months

Non Conformity

Non-compliant products will be re-processed to achieve the required parameters. Should this not be possible, non-compliant materials will segregated and removed from the facility in an appropriate method.

Handling and Delivery

Refer to 'Incoming Waste' and 'Method of Production' described above. Outgoing products will be delivered using appropriate delivery notes, refer to example note in Appendix A.

Record Keeping

The following records will be kept and available to the customer/regulator:

1. Waste Transfer notes (retained for a minimum of 2 years)
2. Test procedures and results
3. Corrective actions taken where constituents or mixture examined have not satisfied the requirements of this protocol.
4. Delivery notes for outgoing Products
5. Copy of Waste Permit for recycling facility

Quality Statement

This Quality Protocol has been written to conform with the WRAP Quality Protocol for the production of aggregates from waste materials.

Information to be Provided by the producer

When requested by the purchaser, the producer shall provide:

a) test results
b) test procedures
c) outline details of the factory production control manual.

APPENDIX A

COOK & SON LTD

No: 195251

DATE

TIME ON SITE

TIME OFF SITE

Rowley Cottage, Rowley Farm, Lowfield-Heath,
Crawley, West Sussex RH10 9SL (Transferee)
Telephone: 01293 524759 **Fax:** 01293 619396

DUTY OF CARE CONTROLLED WASTE / MATERIAL TRANSFER NOTE

SECTION A: DESCRIPTION OF WASTE / MATERIAL **SIC CODE 41201 | 41202**

1. DESCRIBE WASTE OR MATERIAL BEING TRANSFERRED (TICK OR STATE OTHER AND ENTER 6 DIGIT EWC)

- ❑ Soil & Stones 170504
- ❑ Concrete 170101
- ❑ Hardcore 170107
- ❑ Bituminous mixture (tarmac) 170302
- ❑ Mixed Construction & Demo Waste 170904
- ❑ Other
- ❑ Description of waste:
- ❑ CL:AIRE:
- ❑ Reclaimed Soil 191209

EWC

2. HOW IS THE WASTE / MATERIAL CONTAINED (TICK) AND QUANTITY (WRITE IN QUANTITY)

- ❑ LOOSE _____ m^3
- ❑ SKIP _____ YDS
- ❑ GRAB LOOSE _____ m^3
- ❑ OTHER (PLEASE DESCRIBE AND GIVE QUANTITY

OTHER WORK	AGGREGATE		
❑ DAYWORK	Type _____	Gross Weight	-
❑ HAULAGE TO		Tare Weight	-
		Nett Weight	-

SECTION B: CURRENT HOLDER OF WASTE / MATERIAL (SITE / CUSTOMER / PRODUCER)

COMPANY NAME _____

SITE ADDRESS _____

BY SIGNING SECTION B: CAN CONFIRM THAT I HAVE FULFILLED MY DUTY TO APPLY THE WASTE HIERARCHY

PRINT NAME: _____ SIGNATURE: _____

SECTION C: PERSON COLLECTING THE WASTE / MATERIAL

DRIVER NAME: _____ SIGNATURE: _____

VEHICLE REG: _____ REG. WASTE CARRIER NO. CBDU105578

SECTION D: THE TRANSFER POINT (DISPOSAL POINT)

NAME AND ADDRESS OF PLACE OF TRANSFER / DISPOSAL POINT

WASTE DISPOSAL / WASTE MANAGEMENT LICENCE NO.

DATE OF TRANSFER **TIME**

Customers ordering vehicles off the public road do so entirely at their own risk. Waiting time will apply after 20 minutes of loading / unloading.

White Copy – Customer Yellow Copy – Office Pink Copy – Office Blue Copy – Tip

Appendix C
Site Plan (Permit Schedule 1)

Schedule 1 - Site plan

This is the plan referred to in the standard rules SR2010No12