Environmental Management System (EMS)

Physical treatment of hazardous and non-hazardous waste

Godstone Highways Depot

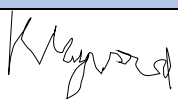
Ringway Infrastructure Services Ltd

Godstone Highways Depot
Oxted Road,
Church Town,
Godstone,
Tandridge,
Surrey,
RH9 8BP

Document Control

Document Title	Environmental Management System
Revision	1.0
Date	19/12/2023
Document Reference	Ringway Godstone EMS 19-12-23
Prepared For	Ringway Infrastructure Services Ltd
Authored By	MTS Environmental Ltd

Quality Control

Revision No.	Date Revised	Amendments	Authored By	Sign Off	Approved By	Sign Off
1.0	19/12/23	Original draft for permit application	Kasia Haywood		Luke Bridges	

DISCLAIMER: This document was prepared by MTS Environmental Ltd solely on behalf of the Client (Ringway Infrastructure Services Ltd). MTS accepts no responsibility or liability for any use that is made of this document other than the purpose for which it was originally commissioned and prepared.
This document may contain information of a specialised and/or highly technical nature and the Client is advised to seek clarification on any elements which may be unclear to it. The information, advice, recommendations and opinions in this document should only be relied upon in the context of the whole document and any documents referenced explicitly herein and should then only be used within the context of the appointment.
Information reported herein may be based on the interpretation of public domain data collected by MTS and/or information provided by the Client. These data have been accepted in good faith as being accurate and valid.

Contents

Appendices

Appendix A – Bespoke Permit

Appendix B – Site Location, Layout and Drainage Plans

Appendix C – Sensitive Receptor Plan

Appendix D – Training Records

Appendix E – WRAP Quality Protocol – Aggregates from inert waste

Appendix F – Environmental Risk Assessment

Reference Documents

Dust Management Plan

Noise Management Plan

1. Introduction

1.1 General

1.1.1 This document comprising an Environmental Management System (EMS) has been written for 'The Operator' who will undertake the physical treatment of hazardous and non-hazardous waste in accordance with a bespoke environmental permit (permit reference: TBC).

1.1.2 This document has been prepared by MTS Environmental Ltd on behalf of the Operator: Ringway Infrastructure Services Ltd. It is to manage operations at their Godstone Highways Depot. The permit is referenced in Appendix A.

1.1.3 Condition 1.1.1 of the environmental permit requires that the Operator manages and operates the activity:

a) in accordance with a written Management System that identifies and minimises risks of pollution including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention as a result of complaints.
b) and using sufficient competent persons and resources.

1.1.4 Additionally, the Environment Agency (EA) has published Environmental Permitting Guidance to help Operators understand the conditions or rules of the Permit. It describes the standards and measures that must be used to control the most common risks of pollution from the activity. The EA stipulate that an Operator must read, understand and keep a copy of the following guidance notes with the Permit.

- Develop a management system and control and monitor emissions for your environmental permit.[1]
- WRAP Quality Protocol – Aggregates from inert waste (Appendix E)[2] (as the site processes soils, soil substitutes to be used for the production of aggregates)
- Chemical waste: appropriate measures for permitted facilities
- Inert and non-hazardous waste: appropriate measures for permitted facilities

1.2 Permits

1.2.1 The operator will work in accordance with its management systems and permit conditions where required and instructed. Under all other circumstances the Operator will work under the permits detailed in 1.3.

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

[2] WRAP Quality Protocol – Aggregates from inert waste (October 2013)

1.3 Environmental Permits

1.3.1 The environmental permit (permit number: TBC) authorises the Operator to operate, receive, process and store waste in accordance with the criteria outlined in the permit. The permit is a bespoke permit for an installation waste activity for physical treatment of hazardous and non-hazardous waste. The site will operate as a highways depot, the activities consist of treatment of tar bound materials, inert and excavation wastes for re-use back in highways schemes.

1.4 Part B Mobile Plant Permit

1.4.1 The operator may carry out processing activities using a sub-contractor using mobile plant on a campaign basis, it is expected to be infrequently. Part B permits will be used to manage these processing facilities, sub-contractors will work in accordance with the site permit and its own Part B mobile plant permit requirements. The Part B permit will control noise impacts from the plant.

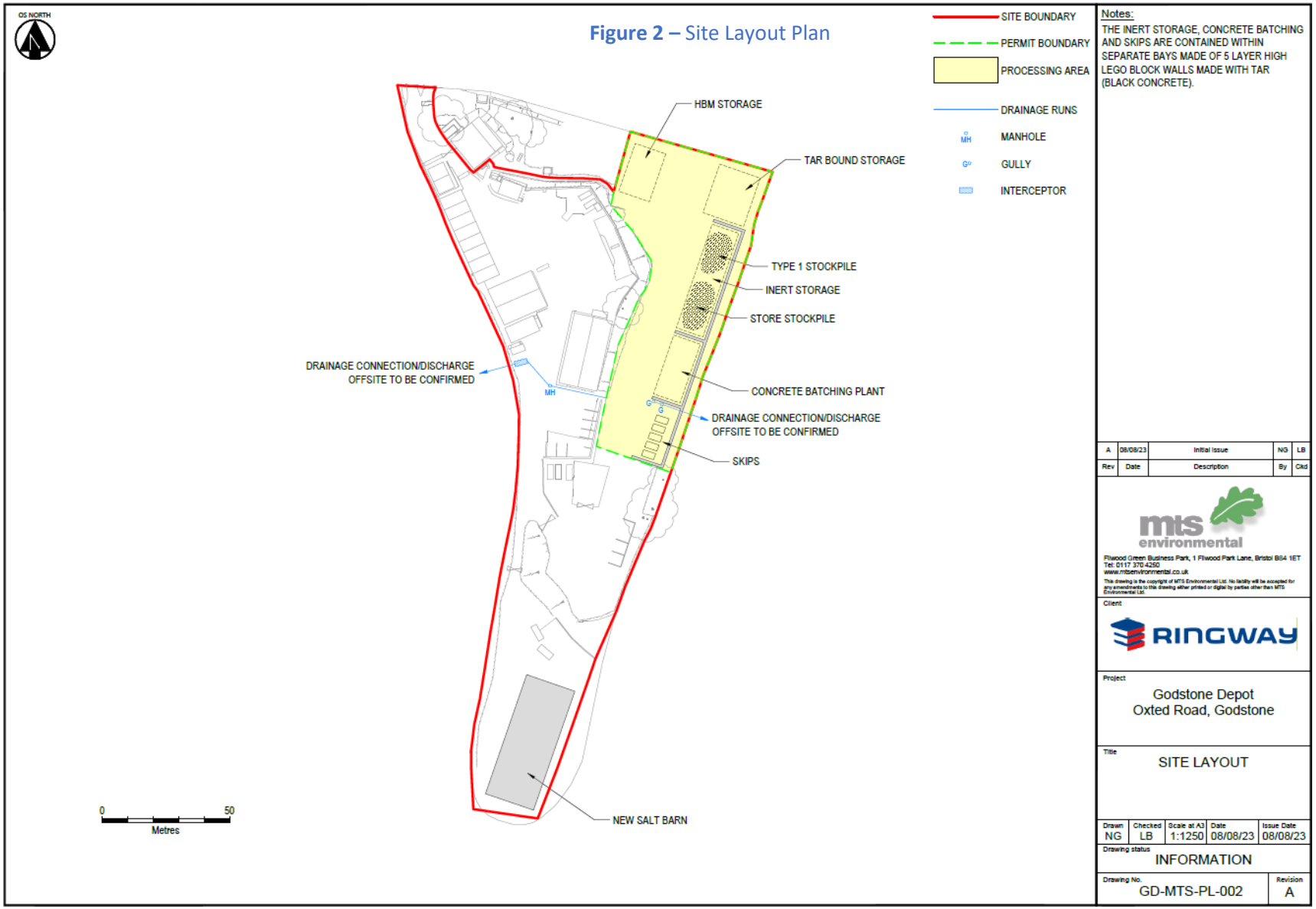
2. Site Location

2.1 General

2.1.1 The site is located at Godstone Highways Depot, Oxted Road, Church Town, Godstone, Tandridge, Surrey, RH9 8BP as shown on the Site Location Plan in Appendix B and Figure 1 below. The approximate national grid reference for the site is TQ 35419 51952. The site layout can be found in Figure 2.

Figure 1 – Site Location Plan

Figure 2 – Site Layout Plan



2.2 Site Infrastructure Plan

2.2.1 The site does have gas or electricity availability.

2.2.2 The site does have a mains or borehole water access point. A mobile water bowser will be made available on site when required for damping down or washing down the haul road.

3. Management

3.1 General Management

3.1.1 The Operator shall manage and operate the activities in accordance with this EMS, associated management plans and the site permit, using sufficient competent persons and resources.

3.1.2 Operating Techniques refer to the technical standards cited within EA guidance notes found on the gov.uk website. The site will operate in accordance with the EA appropriate measures for permitted facilities for chemical waste, and non-hazardous and inert waste.[3] [4] Annual reviews of the guidance will be undertaken to ensure this EMS is maintained in line with current legislation and guidance.

3.1.3 Records demonstrating compliance with the permit shall be maintained in accordance with Section 6 of this document.

3.1.4 Any person having duties that are or may be affected by the matters set out in this EMS shall have convenient access to a copy of this document and the permit. These documents will be available electronically via the electronic systems and issued as hard copy in the depot.

3.2 Contingency Planning

3.2.1 The Operator will ensure that there are contingency plans in place to manage storage and treatment operations in the event of:

- Machinery / Plant breakdown
- Accidents that may result in pollution to the environment
- Delivery problems
- Adverse weather conditions
- Staff shortages

[3] Chemical waste: appropriate measures for permitted facilities, Environment Agency, Dec 2022, https://www.gov.uk/guidance/chemical-waste-appropriate-measures-for-permitted-facilities

[4] Non-hazardous and inert waste: appropriate measures for permitted facilities, Environment Agency, Dec 2022, https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities

3.2.2 The Operator will ensure that there are:

- Repair/servicing contracts in place for all plant and machinery
- That repair /replacement can be achieved rapidly
- That there is sufficient storage provision in the case of interruptions to the operation
- Available staff to cover absence

3.2.3 In the event of an accident the Operator will follow the procedures in the Accident and Medical Incident Process.

3.2.4 In the event of an emergency, operations will be suspended where necessary to allow action to be taken safely. If necessary, all staff and others on site will be evacuated.

3.2.5 The Site Manager will be contacted in the event of any operational failure. The Operator will decide if operations are to be suspended before corrective action is taken. Any failures will be recorded in the site diary.

3.3 Sufficient Competent Persons

3.3.1 The Operator shall comply with the requirements of an approved competence scheme. The Technically Competent Manager/s (TCM) holds the Level 4 Certificate in Waste and Resource Management WAMITAB qualification. The TCM on site initially will be Luke Bridges. Copies of the Certificates of Technical Competences (COTC) are included in Appendix C.

3.3.2 The site will be supervised by the TCM for at least 20% every week during operational hours. The TCM will make his presence known to the Nominated Competent Person/s (NCP), when attending the site.

3.3.3 Where it is necessary to utilise NCP's, the Operator will ensure that the NCP's have a direct line and report to the TCM on a daily basis. The TCM will ensure that all NCP's are provided with copies of and be familiar with the following:

- The relevant permit conditions and limits
- The EMS
- The planning permission
- Site-specific management plans

3.3.4 During operational hours the site will be supervised by the NCP/s who will be suitably trained and conversant with the requirements of the EMS and the permit to ensure that:

- All storage and treatment is carried out in accordance with the documents cited in point 3.3.3 above

- They have sufficient authority to give or withdraw approval for treatment to go ahead at a particular time using specific risk assessments (e.g., with reference to weather conditions)
- They can be at site within 24 hours when treatment is occurring and 4 hours at any other time
- The person/s operating the equipment delivering the waste to the site have been briefed on where and how the waste must be stored prior to treatment
- They raise any issues with the TCM to prevent permit breaches
- They are the first responder to any incidents including dust, noise or odour issues if the TCM is unavailable
- They record any incidents or non-conformances to the TCM

3.3.5 An NCP can be a direct employee of the company, a contractor or consultant or the TCM. The Operator will ensure that the roles and responsibilities of the NCP are clearly stated.

3.3.6 The Operator will ensure that the NCP is sufficiently trained to understand the following aspects:

- Waste management legislation and its requirements
- Environmental risk assessment
- Environmental protection measures
- The Operator's management procedures

3.3.7 The Operator will maintain training records to demonstrate competence. These will be made available for inspection by the regulator.

3.3.8 The Operator will ensure that the management structure is regularly reviewed and kept updated to reflect any changes in management and staffing within the organisation, and/or as regards external contractors and consultants. Roles and responsibilities will be defined, and a written record will be maintained for inspection.

3.4 Staff Training

3.4.1 All new and existing staff will follow a specific training regime based on their role and responsibilities on site. This will improve the operation on site and reduce the likelihood of accidents and incidents which may harm the environment or site staff.

3.4.2 All staff will complete an orientation at the site and will maintain an up-to-date training record.

3.4.3 All staff are required to be aware of the controls outlined in this document and other relevant Management Plans.

3.4.4 All staff will receive appropriate health and safety and fire safety training relevant to their role.

3.4.5 Relevant staff will be trained in waste acceptance, identification of waste types and management of storage areas to ensure that operations comply with the requirements set out in the permit for the site.

3.4.6 Plant operators will have the necessary qualifications and will be trained to regularly check plant and machinery and identify any defects to prevent incidents that could have a negative impact on the environment or safety.

3.4.7 Contractors working on the site on a temporary basis will receive general site training.

3.5 Avoidance, Recovery and Disposal of Wastes Produced by the Activities

3.5.1 The Operator shall take appropriate measures to ensure that:

(a) The waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and

(b) Any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and

(c) Where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.

3.5.2 The Operator will ensure that each waste stream arising from the regulated facility will be characterised and quantified.

3.5.3 The Operator will use government guidance to decide how each waste stream is to be recovered or disposed of and be capable of justifying decisions that deviate from best practice.

3.5.4 Records will be maintained in order to explain why any waste may be subject to disposal. These will explain:

- Why recovery is technically and economically impossible; and
- Describe the measures planned to avoid or reduce any impact on the environment.

3.5.5 The Operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

4. Operations

4.1 Permitted Activities

4.1.1 The permit boundary is outlined in red on the Site Location Plan in Appendix B. Any references to ‘the site’ made in this or other site documents refer to this area and associated infrastructure.

4.1.2 The permitted activities on site are:

- 1.16.1.2 Section 5.3 (a) (ii) – hazardous waste installation – physico-chemical treatment
- 1.16.12 - physical treatment of non-hazardous waste.

4.1.3 The site allows tar bound, inert and excavation wastes treatment and recovery for reuse on highways schemes. Activities will include the storage, treatment and recovery of wastes. Treatment consists of manual sorting, separation, screening, crushing, blending, drying and mixing of waste for recovery or disposal.

4.1.4 The operating hours of the site are as follows:

- 07:00 to 18:00 Monday to Friday
- 07:00 to 13:00 Saturday
- Closed on Sundays and Bank/Public Holidays

Outside of these hours, onsite maintenance work, emergency deliveries and general office use will be the only activities on site, no waste processing operations shall occur.

4.1.5 The annual throughput tonnage will not exceed 75,000 tonnes. The maximum storage capacity is 10,000 tonnes of waste on site at any one time.

4.1.6 The Operator shall not undertake any waste management treatment activity unless it specifically complies with Table 1.

Table 1 – Permitted waste activities

Activity Reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
AR1	Section 5.3 Part A(1)(a)(iii) Recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving blending or mixing.	Physical treatment of hazardous waste **R5:** Recycling/reclamation of other inorganic materials.	From receipt of hazardous wastes to despatch of treated product or further treatment (AR2). Treatment consisting of blending and mixing. Temporary storage of hazardous waste following treatment, pending dispatch off site. All wastes shall be stored on impermeable ground with sealed drainage. Waste types and quantities as specified in Table 2.

AR2	Section 5.3 Part A(1)(a)(vi) Recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving recycling or reclamation of inorganic materials other than metals or metal compounds.	Physical treatment of hazardous waste **R5:** Recycling/reclamation of other inorganic materials.	From receipt of hazardous wastes to despatch of treated product or further treatment (AR1). Treatment consisting of sorting, separation, screening, crushing, blending and mixing of waste for recovery as an aggregate. Temporary storage of hazardous waste following treatment, pending dispatch off site. All wastes shall be stored on impermeable ground with sealed drainage. Waste types and quantities as specified in Table 2.
AR3	Section 5.6 Part A(1)(a) Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in Sections 5.1, 5.2, 5.3.	**R13:** Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).	Temporary storage of untreated hazardous waste prior to activities AR1 and AR2. Liquid wastes should be stored in accordance with condition 3.2.3 of this Permit. All wastes shall be stored on impermeable ground with sealed drainage. Waste types and quantities as specified in Table 2.
Activity Reference	Description of activities for waste operations		Limits of specified activity and waste types
AR4 Waste transfer station with treatment for inert and excavation wastes	**R3:** Recycling/reclamation of organic substances which are not used as solvents. **R4:** Recycling or reclamation of metals and metal compounds. **R5:** Recycling/reclamation of other inorganic materials. **R13:** Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).		From receipt of waste to dispatch. Treatment consisting of manual sorting, separation, screening, drying or crushing of waste into different components for recovery or disposal. Liquid wastes should be stored in accordance with condition 3.2.3 of this Permit. All wastes shall be stored on impermeable pavement with sealed drainage.

	D9: Physico-chemical treatment not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12. **D14:** Repackaging prior to submission to any of the operations numbered D1 to 13. **D15:** Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced).	The quantity of wastes treated for disposal shall not exceed 50 tonnes per day. Waste types and quantities as specified in Table 3.

4.2 Permitted Wastes

4.2.1 No wastes other than those with the European Waste Codes (EWC) listed in Table 2 and 3 below shall be accepted onto site. Table 2 details permitted waste types for treatment and associated storage of asphalt and road planings (activities AR1, AR2 and AR3). Table 3 details permitted waste types for inert and excavation waste transfer station with treatment (activity AR4).

Table 2 – Waste codes and descriptions permitted on site for activities AR1, AR2 and AR3

Waste Code	Description	Processing Activity
17 03 01*	Bituminous mixtures containing coal tar	Sorting, separation, screening, crushing, blending and mixing
17 05 03*	Soil and stones containing hazardous substances	
17 05 05*	Dredging spoil containing dangerous substances	

Table 3 – Waste codes and descriptions permitted on site for activity AR4

Waste Code	Description	Processing Activity
17 01 01	Concrete	Manual sorting, separation, screening, drying or crushing
17 01 02	Bricks	

17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 03 02	Bituminous mixtures other than those mentioned in 17 03 01
17 04 07	Mixed metals
17 05 04	Soil and stones other than those mentioned in 17 05 03
17 05 06	Dredging spoil other than those mentioned in 17 05 05
19 12 09	Minerals (for example sand, stones)
19 12 12	Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11
20 02 02	Soil and stones

4.3 Operating Techniques

4.3.1 All permitted wastes shall be stored and treated on an impermeable surface, of which the whole site is surfaced in, with a sealed drainage system

4.3.2 The site benefits from a palisade fence around the perimeter which aids to protect the site and mitigate impacts from dust, noise and odour.

4.3.3 Run off from the site drains naturally into the sealed drainage system which catches all site surface run off, therefore there is very low risk of contamination entering groundwater or local watercourses.

4.3.4 The site will operate following the techniques listed in Table 4 below.

Table 4 – Operating Techniques

Operating Techniques
1. The Operator will follow the Environmental Management System, Dust Management Plan and Noise Management Plans approved by the Environment Agency.
2. The site will be operated in accordance with all the relevant parts of the EA guidance – chemical waste: appropriate measures for permitted facilities, and non-hazardous and inert waste: appropriate measures for permitted facilities.
3. Treatment:

a) All treatment shall be carried out on an impermeable surface with a sealed drainage system.
4. Storage: a) All wastes shall be stored on an impermeable surface with a sealed drainage system, with provision of spillage collection facilities and, where appropriate, decanters and cleanser degreasers.

4.3.5 Any non-conforming materials will be stored in the quarantine area and removed from site as soon as possible to be taken to an appropriately permitted site.

4.3.6 Materials will be treated following Best Available Techniques (BAT).

4.4 Site layout and general principles of operation

4.4.1 Details of the site layout are shown on the site layout plan in Appendix B and Figure 2. The site is separated into safe working areas with dedicated boundaries for specific activities.

4.4.2 Waste will be stored securely in segregated stockpiles. The Operator will take all precautions to prevent the waste from escaping and ensure that members of the public are unable to gain access to the waste.

4.4.3 Solid waste will be stored and managed in accordance with the appropriate measures specified. These include:

- External segregated stockpiles and storage bays (limited to 4m high)
- Locate temporary stockpiles in areas to prevent mixing of different waste streams
- Grade stockpiles to promote rainwater run off rather than infiltration through the stockpile
- Manage all run–off or leachate which may be produced by the waste appropriately
- Be aware of slumping
- Consider location of sensitive receptors such as residential properties /workplaces in relation to stockpiles that might be affected by loss of amenity, dust, noise or odour.

4.4.4 The Operator will follow best practice for the storage of materials as listed below:

- Not on land likely to become waterlogged, frozen or snow covered
- No dusty or odorous waste within 250m of residential or workplaces
- Not on land likely to flood
- Not on steeply sloping ground where there is risk of run off
- Not over land drains or land drained in the last 12 months
- Storage on an impermeable surface

4.4.5 The following plant and machinery will be operated in the Ringway Godstone Highways Depot:

- Grading and Screening Plant
- Mobile Water Bowser
- Crusher
- 360 Material Handlers
- Wheeled Loading Shovels
- Excavator

4.4.6 Waste will only be stored at the site of treatment for a maximum of 1 year prior to disposal and 3 years prior to recovery.

4.4.7 Hazardous wastes will be stored or treated in a segregated and appropriately signed area separate from inert and non-hazardous wastes.

4.4.8 The site is surrounded by a perimeter palisade fence. There is established vegetation and trees surrounding the fence and site to act as a visual, dust and noise screen.

4.5 Control of Mud and Debris

4.5.1 To control the release of mud and debris onto the public highway the following methods will be employed:

- Road sweeping
- Dampening down
- Containment, storage and treatment of waste is in segregated areas within stockpiles
- Designated one-way haul road

4.5.2 In the event of any mud/debris found to be on the public highway resulting from lorry movements from the site, the affected public areas outside the site shall be cleaned. Measures will be taken to clear any such sources from the highway as soon as is practicable.

4.5.3 Additionally, all loaded vehicles will be sheeted to avoid the escape of any waste.

4.5.4 The site will operate in accordance with a site-specific Dust Management Plan outlining the mitigation measures in place on site.

4.6 Potentially Polluting Leaks and Spillages of Waste

4.6.1 Adherence to the monitoring regime set out in Table 5, in conjunction with the site engineering for pollution prevention and the acceptance of permitted wastes only, will ensure that the risk of potentially polluting leaks and spillages of waste from the site is minimised.

4.6.2 Any minor spillages of liquid waste or oil shall be cleaned up immediately, using sand or proprietary absorbent to clean up liquids. In the unlikely event of a major spillage, immediate action shall be taken to prevent contamination entering surface drains, watercourses and un-surfaced ground. Temporary bunds using sand, soil or similar, or absorbents will be placed around the area affected until the spill is cleared up.

4.6.3 Once the spillage has been contained any materials that may be subject to contamination shall be cleared immediately and placed in sealed, labelled containers. These will be taken to a suitably permitted site for disposal. The Environment Agency shall be informed immediately, and the details of the event recorded in the site diary in accordance with the Ringway Godstone Management System.

4.6.4 In the event that a spillage has contaminated the surface water drainage system, the operator will arrange for the drainage system to be cleaned and emptied and the contents disposed of to a suitably permitted site.

4.6.5 Fuel and oil is stored on site. It will be contained in compliance with oil storage regulations. The fuel tanks will be contained within a bund capable of containing 110% of the maximum volume of the tank. This bund will enclose all the pipework and infrastructure associated with the tank. The fuel store will be locked to prevent unauthorised access to prevent leaks and theft.

4.6.6 All potentially contaminating wastes/non-conforming wastes will be stored within a quarantine area and removed off site within 7 days.

4.6.7 All site surfaces will be inspected during daily checks for any litter or spillages. Any litter will be swept as necessary and contained for disposal to a suitably permitted site.

4.7 Surface Water Management

4.7.1 Surface water from the site will naturally drain into the sealed drainage system as the site is surfaced in impermeable concrete. It is treated through an interceptor and then drains into the foul sewer system.

4.7.2 Bay Pond located to the south of the site is protected by the surrounding vegetation and 200m buffer zone from the site to the pond which prevents run-off from discharging directly into the waterbody. Surface water drains into the site drainage system to reduce the chance of flooding and prevent any volume of runoff entering the watercourse.

4.7.3 Maintenance procedures will involve regular inspections, sediment removal and cleaning every six months in accordance with Environment Agency guidance.

4.7.4 In the event of a fuel spill or contaminating material escaping onto site, the contaminated run-off will be contained on site using booms and sand, the material will be emptied and sent to an appropriately permitted site with the relevant HWCN documentation.

4.8 Fires on Site

4.8.1 No combustible wastes are permitted on site.

4.8.2 No wastes shall be burnt on site. The use of welding/cutting tools (i.e., with naked flame) must be sanctioned first by the Depot Supervisor/competent person and a hot works permit issued. There is no intention of conducting such activities on site.

4.8.3 Special care will be taken with respect to potentially explosive/volatile material during handling, e.g., aerosol cans, oxidising agents, corrosive substances. These shall be removed from the waste load prior to further handling. These wastes are not permitted under the permit and, the quantities and occurrence of these waste types entering the site is predicted to be very small as long as the waste acceptance procedures are strictly adhered to. These will be separated and stored in sealed containers in the quarantine area before removal from site to an appropriately permitted site as soon as is practicably possible.

4.8.5 Appropriate fire extinguishers shall be made available and easily accessible.

4.8.6 Fuel is stored on site in accordance with point 4.6.5 in this document.

4.8.7 Regular fire drills will be conducted on site to ensure that staff follow the proper procedures.

4.9 Site Security

4.9.1 The site boundary is surrounded by fencing and established vegetation, as shown on the site layout plan, and secure lockable 2.5m high gates at the main entrance. The fencing consists of palisade fencing.

4.9.2 24-hour CCTV is in operation on site.

4.9.3 In the event of a bomb scare, the site will be immediately evacuated, operations suspended, and the police contacted. The police will then take control of the site until the threat is removed. The EA will be informed of the event.

4.10 Recording and Reporting Procedures

4.10.1 Records will be kept of all significant events (including fire, accidents, waste refusal) in the site diary. Information should include the nature and extent of the incident, and the actions and remediation measures taken. The site diary must be in a form where it can be audited.

4.10.2 Where site personnel have dealt with a fire successfully, it should be reported to the Fire Service as well as the Environment Agency.

4.11 Waste Acceptance and Control Procedures

4.11.1 Waste shall only be accepted if:

- It is of a type listed in Table 2 or 3 above
- It conforms to the description in the documentation supplied by the producer and holder

4.11.2 The Operator will ensure that all wastes accepted at the site for storage, treatment and recovery are fully characterised and acceptable by implementing the following procedures;

- Visual inspection of incoming materials in accordance with the appropriate documentation
- Waste transfer note
- Chemical analyses

4.11.3 The Operator will ensure that all Duty of Care Waste Transfer Notes (WTNs) include the following information and written legibly:

- Delivery date and time
- Origin of the waste
- Waste description including type, quantity and EWC code
- Container type
- Carriers' details
- Identity of the waste producer

4.11.4 The Operator will refer to the supporting information and WTN to identify and understand the beneficial and harmful properties of the waste to identify any potential problems that may arise from storage, transport and re-use.

4.11.5 The Operator will confirm the physical state; liquid, sludge or solid by reference to the definitions found within EA Guidance for waste acceptance at landfills. [5]

4.11.6 Upon arrival on site, all vehicle drivers must report to the site office for inspection and weighing.

4.11.7 All waste received at the site shall be visually inspected to confirm that the description and composition conform to:

a) the written description and the European Waste Code on the relevant Duty of Care WTN, and
b) the description as detailed in the permit, and
c) any other accompanying documentation.

[5] Guidance for waste acceptance at landfills, Environment Agency

4.11.8 Once confirmed the load will be discharged to the appropriate storage area / stockpile. The waste shall be discharged and visually checked for a second time to ensure that there are no non-permitted wastes within the load.

4.11.9 All wastes received shall be kept separate from, and shall not be covered by or mixed with, other wastes until they have been confirmed and recorded for acceptance at the site.

4.11.10 Records will be maintained in accordance with Section 6 of this EMS.

4.12 Waste Refusal

4.12.1 In the event that a vehicle load, upon inspection, is non-compliant with the Environmental Permit the following steps will be implemented:

- Refusal of the container/load will result in refused entry
- Enter the event in the site diary, including the relevant information contained on a WTN
- Contact waste producer to advise

4.12.2 Any items of non-permitted waste which are detected after acceptance at the site shall be placed immediately in the designated quarantine storage area, comprising a skip or similar container and segregated from the other wastes. The details shall be entered into the site diary.

4.12.3 Quarantined waste shall be removed from site within 7 days. A record shall be kept of all rejected wastes in the Site Diary.

4.12.4 Waste will be refused if maximum storage capacity has been reached on site, no further waste will be accepted until other waste has been removed off site to an appropriately permitted or exempt site.

4.13 Waste Quantity Measurement Systems

4.13.1 Incoming waste shall be recorded in cubic metres based on the container volume. This shall be recorded by adding load information onto the Ringway electronic system.

4.13.2 A summary of waste outputs and inputs onto site will be submitted to the EA using the standard Generic Operator Returns electronic spreadsheet every quarter.

4.14 Site Inspections

4.14.1 The site inspections shall be undertaken by the TCM or NCP in their absence. Table 5 represents the suggested inspection criteria, issues that may need to be covered and gives the suggested time intervals.

Table 5 - Site inspection checklist

Issue	Frequency	Action
General site and road cleanliness (presence of mud/debris)	Daily	Sweep road, impermeable surfacing if mud/ debris present. Record Inspections /actions in diary.
Inspect tanks, settlement tanks, interceptors, containers, drums, drip trays and secondary containment for leaks or accumulation of sediment.	Daily	Any leaks to be stopped and cleaned up, containers to be cleaned / replaced / repaired immediately. Record inspections/ defects, damage and repairs in diary.
Visual inspection of boundary fences and gates for breaks / damage where applicable.	Daily	Any defects shall be made secure by temporary repair before the start of operations/end of working day and shall be repaired within 24 hours of the damage being detected. Record Inspections/ defects, damage and repairs in site diary.
Check mobile bowser	Daily	Any defects shall be repaired before the start of operations / end of the day within 24 hours of the damage being detected. Record Inspections/ defects, damage and repairs in Diary.
Visual monitoring for aerial emissions-monitor dust at random times throughout the day and in accordance with the Dust Management Plan (DMP)	Daily	Check site boundaries for visual dust emissions at least twice daily. Record inspections / results / weather conditions / cause and actions in site diary.
General site cleanliness (presence of litter and dust deposits inside /outside site boundary)	Daily	Site walkover and inspection. Collection from inside and outside site (including boundary hedging) twice daily. Investigate the cause. Record inspections/ defects, damage and repairs in site diary.
Olfactory Monitoring for odour	Daily	Olfactory testing and record keeping in accordance with the OMP.
Olfactory Monitoring for noise in accordance with the Noise Management Plan (NMP)	Daily	Olfactory testing and record keeping in accordance with the NMP.
Site Signage.	Daily	Check that signs are in good condition and arrange to repair /replace if damaged. Record inspections/ defects, damage and repairs in site diary.
Pest infestation check. Check containers and stockpiles to monitor for vermin, scavengers and flies	Daily	Implement Pest Management Plan if presence of vermin, scavengers and /or flies are noted. Record daily inspections and results in site diary.

Issue	Frequency	Action
Ensure waste is stored in appropriate segregated containers and areas in accordance with Good Practice Guidance	Daily	Check quantities are in accordance with EMS and Permit. Segregate as and when necessary. Record actions in site diary.
Check condition of fixed storage facilities – drainage, lagoons/containers etc.	Weekly	Remove silt upon build up. Check and record levels within containers/lagoons. Take action to prevent spillage/ remove via vacuum tanker, etc. Record actions in site diary.
Inspection of plant	Weekly	Maintenance/repair/regular servicing. Record actions in diary and plant maintenance log sheets.
Surfacing	Monthly	Any defects affecting the integrity shall be repaired within one week.

4.14.2 Any necessary repairs will be made within 5 working days of discovery, unless agreed otherwise with the EA.

4.14.3 Any major defects which have the potential to cause a breach in permit if not repaired will be repaired by the end of the same working day. If this is not possible then contact with the EA will be made to agree alternative options.

4.15 Site Closure Plan

4.15.1 In the event that the Operator wishes to cease the permitted waste operations on the site, the Operator will contact the EA to inform them of the closure.

4.15.2 Any waste remaining on site will be inspected by the TCM, who will produce plans for its quick and safe removal off site.

4.15.3 All waste, plant and machinery will be removed from site.

4.15.4 A site investigation will be conducted to determine the quality of the ground condition on site following all operations.

4.15.5 The Operator will submit a surrender of the permit application to the EA for duly making.

5. Pollution Control, Monitoring and Reporting

5.1 Pollution Risk Management

5.1.1 The operator will ensure that a site-specific risk assessment and management plans are used throughout all treatment activities.

5.1.2 See Section 4.7 for surface water management.

5.2 Contact Information for the public

5.2.1 The site will have a publicly visible sign at the entrance with contact details for the Operator so neighbouring businesses or local residents can contact Ringway if they have any complaints/issues at any time.

5.2.2 The site sign will have a contact telephone number for the site manager who is available 24 hours.

6. Emissions and Monitoring

6.1 Introduction – Emissions to air, land and water

6.1.1 Emissions from waste to land during operations can lead to pollution of surface and groundwater, and the air. Waste storage and treatment operations can lead to the production of emissions of dust, aerosols, odour and noise.

6.1.2 The EA requires that the Operator take appropriate measures to control potential emissions to or from the waste operation. The following sections therefore set out the measures that will be taken to prevent or minimise the risk to potentially sensitive receptors.

6.1.3 All sensitive receptors to the site and their respective locations are shown on the sensitive receptor plan in Appendix C. This EMS has been produced in consideration of these receptors and their protection.

6.2 Monitoring and Control of Dust Emissions

6.2.1 The key sources for the generation of dust on site are:

- Dust raising from public, haul roads and operational surfaces through vehicle movements
- Dust raising from the mechanical loading/unloading of wastes
- Dust raising from the treatment operation
- Dust raising from stockpiles

6.2.2 The Operator shall take all appropriate measures to reduce and prevent dust emissions generated by the site. Table 6 below sets out the measures that shall be undertaken to control and monitor the release of dust, fibres and particulates.

Table 6 - Measures to control and monitor emissions of dust

Appropriate Measures for Reducing Emissions of Dust
▪ Undertake operations within suitable weather windows wherever possible

Appropriate Measures for Reducing Emissions of Dust	
▪ All incoming loads to be tipped in such a way as to minimise dust generation. ▪ All loading /unloading activities to be undertaken carefully to prevent waste materials being dropped from a height. ▪ Manage loading operations from stockpiles to mixing plant as above. ▪ Keep stockpiles with the potential to give dust as small as possible ▪ Locate potentially dusty material in sheltered areas if possible and consider covering with a suitable material or cover ▪ No storage of waste outside designated containers or stockpile areas. ▪ Limit vehicle speeds during treatment to reduce dust raising ▪ Maintain records of all actions	
Monitoring of aerial emissions	
▪ Daily visual monitoring of aerial emissions at site boundaries shall be carried out by staff supervising all waste handling operations.	▪ TCM /NCP to monitor operations throughout day at and outside the site boundary that is downwind of operations. ▪ Observations and weather conditions including wind direction will be recorded on the dust monitoring sheet. ▪ Complaints to be recorded in the Site Diary

6.2.3 The Operator will take account of the weather conditions and ensure that all waste operations are undertaken in accordance with this information.

6.2.4 The TCM will nominate a person, or persons to be responsible in the absence of the TCM to undertake and record daily random visual monitoring events. Additionally, all operational staff will be made aware of the importance of preventing dust emissions from leaving the boundary of the site which would breach the permit.

6.2.5 In the event of a complaint, the Operator will immediately investigate the source of the dust and whether it is originating from the site. Action will be taken to prevent any further emissions leaving the site. A Corrective Action Report will be completed describing the incident and should include details as specified above. A record will be made in the site diary.

6.2.6 A site-specific Dust Management Plan has been produced, outlining the mitigation measures in place at the site.

6.3 Monitoring and Control of Noise

6.3.1 Noise and vibration will be maintained at levels associated with normal civil engineering activities. Where the site-specific Environmental Risk Assessment identifies sensitive receptors in close proximity to the operation, the Operator will take all measures to minimise noise impacts to those receptors.

6.3.2 The Operator will ensure that all plant is maintained in accordance with the manufacturer's guidelines. Maintenance records will be maintained.

6.3.3 A site-specific Noise Management Plan has been produced, outlining the mitigation measures in place at the site.

6.4 Monitoring and Control of Litter

6.4.1 The risk of litter becoming a nuisance is considered to be very low because wastes will have been segregated and should not contain litter. However, the potential for litter nuisance will be further minimised with the implementation of the following provisions:

- Sheeting of all incoming loads
- All incoming loads to remain sheeted until ready to be tipped
- Daily inspection of the site boundaries at least once per day, corrective action to be recorded in the site diary
- Litter picking when required

6.4.2 On the detection of litter, the operator shall take action to review the waste management processes at the site and modify or cease handling the waste if necessary, in order to minimise the production of litter.

6.4.3 The incident, actions and results shall be recorded in the site diary.

6.5 Monitoring and Control of Pests (including scavengers and gulls)

6.5.1 The Operator will take appropriate measures to prevent and reduce nuisance from scavengers, vermin and files. These are listed below in Table 7.

6.5.2 An inspection of stored wastes for pest infestations shall be carried out at least at weekly intervals and more often, if necessary, by the site supervisor and shall be recorded in the site diary.

6.5.3 On detection or notification of pest infestations, immediate action shall be taken to secure the attendance of a professional pest control contractor, to eliminate the pest infestation. The incident and remedial action shall be recorded in the site diary.

Table 7 - Measures to reduce nuisance from scavengers, vermin and flies

Appropriate Measures for Reducing Nuisance from Scavengers, Vermin and Flies	
▪ Reduce the potential for scavenging, attracting vermin and fly breeding in stockpiles by identifying waste likely to attract flies. ▪ Locate loading/ unloading areas, stockpiles as far from human receptors as is possible ▪ Keep machinery clean ▪ Conclude operations as quickly as possible	
Monitoring of aerial emissions	
▪ Daily visual monitoring of stockpiles by staff supervising waste handling operations.	▪ TCM /NCP to monitor waste types for infestations ▪ Observations and weather conditions including wind direction will be recorded on the site diary

6.6 Monitoring and Control of Mud and Debris

6.6.1 Vehicles will be inspected, both the vehicles and bodies, upon entry and exit of the site for exterior mud and debris. Any excess mud and debris will be removed, and vehicles will be washed down to ensure that no mud is carried out onto access roads or public highways.

6.6.2 Any mud or debris detected on the site roads will be reported to the site manager.

6.6.3 Any mud or debris detected on the local public highways due to operations on site will be cleared immediately by the Operator, manually using a brush or using s road sweeper if necessary.

6.7 Monitoring and Control of Odour

6.7.1 The waste accepted on site is not putrescible so odour should not cause any complications or breach of the permit on site.

6.7.2 On the detection of litter, the operator shall take action to review the waste management processes at the site and modify or cease handling the waste, if necessary, in order to minimise the production of litter.

6.7.3 The incident, actions and results shall be recorded in the site diary.

6.7.4 Any putrescible waste will be contained in quarantine and sent to a suitably permitted site for disposal.

6.8 Climate Change

6.8.1 Planning for the changing climate at the Ringway Godstone Highways Depot is organised into six stages: preparation, potential impacts, risk assessment, control measures, adaptation plan and monitor, record and review plan.

6.8.2 Climate change is considered in Table A5 in the environmental risk assessment included in Appendix F to minimise impacts on the environment and adapt to a changing climate appropriately.

7. Site Records

7.1 Security and Availability of Records

7.1.1 All Duty of Care Transfer Notes will be kept for a minimum of 2 years.

7.1.2 Records of any hazardous wastes accepted by the site, wastes rejected by the site and/or despatched from the site shall be kept in the site office for a minimum of 6 years. These will be available for inspection by an authorised person by accessing the electronic records management system.

7.2 Records of Waste Movements (Waste Returns)

7.2.1 Records of all waste movements shall be kept in accordance with the relevant condition in the permit. Additionally, a summary record of the waste types accepted and removed from the site shall be made on the Environment Agency form every quarter. This information will be submitted to the Agency within 1 month following the end of the quarter.

7.3 Records of off-site Environmental effects

7.3.1 Records of any off-site environmental effects including pollution incidents that caused or were alleged to have caused, harm or health effects will be retained.

7.4 Records of on-site Environmental effects

7.4.1 Records that relate to the condition of the land and groundwater will be retained. The initial state of the site is described within the application Site Condition Report. This is a live document and will be maintained throughout the life of the site. Records will include details on:

- Design, construction, inspection, monitoring & maintenance
- Failure of pollution prevention control measures
- Spills and incidents
- Records of investigations and remedial actions

- Records of remedial action in response to non-conformances as noted by an EA Officer

7.5 Site Diaries

7.5.1 A site diary will be kept secure within the site office and made available for inspection by the Environment Agency as and when required. The diary will contain the following information and be maintained in a form in which it can be audited:

- Start and finish of any construction works
- Maintenance
- Plant and machinery breakdowns
- Emergencies
- Problems with waste received and action taken
- Site inspections and consequent actions carried out by the operator
- TCM attendance - the date and the time on site and the time left site
- Dispatch of any records to the Environment Agency
- Severe weather conditions
- Any environmental problems and remedial actions taken
- Any complaints related to operational activities
- Records of site monitoring – odour / dust / litter / pests / surface water
- Records of inspection of the silt trap/interceptor

7.5.2 All records shall be completed within 24 hours of the event.