Application to Vary an Environmental Permit

Permit number EPR/ YP3891NY

Albright Industrial Estate, Ferry Lane North, Rainham, RM13 9BU

Variation Report

October 2025

Reference: ATS-VAR2025-V2

DOCUMENT CONTROL SHEET

Client	Albright Transfer Station Limited
Project	Albright Industrial Estate, Ferry Lane North, Rainham, RM13 9BU
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05.04.2025	V1	Support application to vary permit	Alison Crooks
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1. INTRODUCTION

1.1 Albright Transfer Station Limited operate a Waste Management facility at Albright Industrial Estate, Ferry Lane North, Rainham, RM13 9BU.

1.2 The Environmental Permit EPR/YP3891NY was originally issued on 13 November 1998. It has been subject to several variations.

1.3 In 2020, the environmental Permit was varied and consolidated.

1.4 In 2024, the permit was varied to make the following changes.

- Change the Permit Boundary
- Add Washing as a specified activity
- Increase the annual throughput from 75,000 tpa to 150,000 tpa
- Consolidate DP3896NH into the main permit YP3891NY
- Add three waste codes:
  - 170204* Wood containing or contaminated with dangerous substances
  - 170301* Bituminous mixtures containing coal tar
  - 191206* Wood containing dangerous substances
  - 200137* Wood containing dangerous substances

1.5 The current version is EPR/YP3891NY C011.

Proposed Changes

1.6 It is proposed to amend the permit to enable the operator to receive and treat hazardous construction, demolition and excavation waste. This will change the nature of the facility from a waste operation to an installation.

1.7 The following activities are required:

- Section 5.3 Part A (1) (a) (vi) recycling or reclamation of inorganic materials other than metals or metal compounds

- Section 5.6 Part A(1) (a) Temporary storage of hazardous waste within a total capacity exceeding 50 tonnes

1.8 Table 1 provides the proposed waste list:

Table 1 – List of Wastes to be added

EWC Code	Description	Area in Site	Treatment Activities
17 01 06*	Mixtures of, or separate fractions of concrete, bricks, tiles and ceramics containing hazardous substances	Hazardous Waste Building	Screened and separated
17 05 03*	Soil and stones containing hazardous substances	Hazardous Waste Building	Screened and separated
17 09 03*	Other construction and demolition wastes (including mixed wastes) containing hazardous substances	Hazardous Waste Building	Screened and separated
19 12 11*	Other wastes (including mixtures of materials) from mechanical treatment of waste containing hazardous substances	Hazardous Waste Building	Screened and separated.

1.9 For 191211* this will specifically include soils and stones that have been produced at other waste sites that fail the WM3 classification for non-hazardous waste. Depending on the nature of that waste, the chemist will determine if this is acceptance for treatment.

1.10 The current permitted annual waste throughput is 300,000 tonnes. It is proposed to receive 50,000 tonnes of hazardous waste per year.

1.11 It is proposed to treat 200 tonnes of hazardous waste a day. The maximum storage capacity for hazardous waste will be 500 tonnes.

1.12 The report has been prepared with reference to the relevant guidance document[1] and BAT[2].

The Operator

1.13 The operator has been involved with waste management for many years and has developed the site progressively since 1998.

1.14 The company currently has a certified ISO14001 Environmental Management System. Site specific operating procedures are provided for the site. For the purposes of the hazardous waste management operation, this report outlines the operational procedures which will be incorporated into the EMS once the variation has taken effect.

1.15 The company has also achieved ISO9001 accreditation.

[1] Chemical waste: appropriate measures for permitted facilities - Guidance - GOV.UK.

[2] BAT Conclusions for the Waste Treatment, Official Journal of the European Union,10 August 2018.

1.16 The operator has achieved and maintained FORS Gold Accreditation. This is a voluntary Fleet Operator Recognition Scheme.

1.17 The operator supports local community projects including clean-up projects and habitat restoration. It provides skips to local schools, parks, sports clubs and hospitals, and has supported the Canal & River Trust for the past 15 years. It has donated over £25,000 to local sport initiatives, including community boxing, go-karting and golf. Most recently, staff took part in a bike riding event, raising £17000 for the charity Helping Homeless Veterans UK

1.18 The company has a policy of recruiting locally, with 92% of its staff based in the local area.

1.19 The company has an excellent track record with compliance and operator performance.

2. MANAGEMENT AND OPERATIONS

Management System

2.1 The company currently has a certified ISO14001 Environmental Management System. Site specific operating procedures are provided for the site. For the purposes of the hazardous waste management operation, this report outlines the operational procedures which will be incorporated into the EMS once the variation has taken effect.

2.2 The company has also achieved ISO9001 accreditation.

2.3 The operator has achieved and maintained FORS Gold Accreditation. This is a voluntary Fleet Operator Recognition Scheme.

Site Infrastructure Plan

2.4 Drawing No ATSL-FL-INF-01 provides the site Infrastructure Plan. This shows the site surfacing, locations of existing buildings, location of fuel tank, drainage and site entrance. Within the Environmental Risk Assessment, all key receptors have been identified on a separate plan.

2.5 The site infrastructure includes:

- Existing building for treating non-hazardous waste
- Proposed new building for Hazardous Waste Treatment
- Storage bays
- Storage building for non-hazardous waste
- Fixed Wash Plant with storage bays
- Weighbridges
- Offices
- Drainage

Site Operations

2.6 The site is an existing operational site for treating mixed construction and demolition waste. The site receives non-hazardous waste from construction, house clearances, refurbishment and demolition projects.

2.7 The non-hazardous waste treatment involves bespoke processing equipment to sort and separate mixed wastes into different categories for recycling.

2.8 There is a washing plant on site which is used to produce aggregates. The wash plant will treat construction waste to produce various grades of sand, stones and aggregates.

2.9 There will be no changes to the existing operation involving non-hazardous waste. This report will describe the operations and processes associated with the new hazardous waste facility.

2.10 The proposed operation seeks to treat hazardous construction and demolition waste. The waste will be received and treated inside a new building. Control measures will be in place to ensure no cross contamination with non-hazardous waste.

2.11 The purpose of the activity is to treat the hazardous waste to achieve non-hazardous status by screening and separation (stone removal from soil).

2.12 The operation is described in more detail in Chapter 4.

Waste Acceptance

2.13 The non-hazardous waste will continue to be accepted as per the current arrangement.

2.14 New waste acceptance procedures will be prepared to deal with the hazardous waste.

2.15 As described in Chapter 4, the waste acceptance procedures will be in accordance with guidance. In summary the procedures include:

- Pre-Acceptance
    - Waste classification
    - Characterisation (nature of process producing waste)
    - Sampling and Analysis
        - Composition
        - Handling requirements
        - Hazard properties
        - EWC code
    - Define treatment and disposal route
    - Creation of unique tracking reference
- On site Acceptance
    - Booked Arrival Date / Time
    - Chemist on site to oversee delivery
    - Capacity checks on site
    - Vehicle waiting, load inspection, checking/sampling
    - Traffic control
    - Checking paperwork
    - Compliance checking/testing
    - Failure of sample meeting compliance checks – quarantine procedure

  - Waste Transfer/Consignment Note
  - Update Waste Tracking Record
- Waste Rejection Procedures

2.16 All staff will be trained in these procedures and understand the procedures for rejecting and quarantine non-compliant waste. As this site will be used to handle specific waste streams and all hazardous waste acceptance will be pre-arranged, the likelihood of non-compliant waste being accepted will be low.

Quarantine, Storage and Rejection of Wastes

2.17 Any non-compliant waste found in the load will be segregated and quarantined. The customer will be charged for the additional handling costs associated with these wastes.

2.18 Details of all rejected loads will be recorded in the site diary. This will include the driver details, vehicle registration, nature of the waste, date/time of rejection.

2.19 A duty of care transfer note or hazardous waste consignment note will be generated for each non conforming waste load returned off site.

Waste Tracking

2.20 The waste will be tracked throughout the process from pre-acceptance, acceptance, on site storage and treatment.

2.21 Overall, the tracking system will include the following:

- Unique Reference Number
- Site Producer Details
  - Source, nature, composition and hazard properties
- On site Checks
  - Date of Arrival
  - Chemical Analysis
  - Rejection
- Bay Number
- Volume Received and treated
- Destination of products
- Name of staff involved in acceptance or rejection procedures
- Name of staff involved in confirming recovery/disposal options

Waste Treatment and Storage

2.22 The treatment processes relate to specific waste streams for which there is a defined market.

2.23 All waste will be received, stored and treated inside a building, which complies with the appropriate measures for this activity.

2.24 The building will provide containment to prevent and minimise fugitive emissions to air, particularly dust.

2.25 A Dust and Emissions Management Plan has been prepared for the site.

2.26 There will be a separate sealed drainage system for the hazardous waste operation. There will be no point source emissions to water.

2.27 The entire site is concreted.

2.28 The hazardous waste will be received, stored and treated inside a building.

2.29 Fuels and oils will be stored in accordance with the Storage of Oils Regulations. The site will not accept liquid waste.

Site and Equipment Maintenance Plan

2.30 The Site Management will be responsible for inspecting the operational areas and preventative maintenance will be undertaken according to the Site Inspection Daily Checks Form.

2.31 The site will have a Technically Competent Manager, with qualifications to manage hazardous waste operation. The three Site Managers have attended the HazWasteOnline Waste Classification Course.

2.32 The TCM is based at this site.

2.33 Plant and machinery on site will be visually inspected by the operator before it is used as part of management of their own risks and health and safety. This is covered in training for staff and operatives. In addition, an equipment check is made by the Site Manager daily as part of Daily Checks and recorded on the Daily Checks Form.

2.34 Procedures are set out in Chapter 4 to confirm how plant and machinery will be used to prevent cross-contamination between hazardous and non-hazardous waste.

2.35 In addition to scheduled preventative maintenance of equipment and machinery, in accordance with legal requirements or manufacturer's recommendations, reactive maintenance will be carried out if needed in accordance with inspection findings. This will be recorded in the site diary. There is a workshop on site which holds spare parts. There is also a vehicle workshop operated by the ATSL in the adjacent yard.

2.36 Daily checks are carried out to assess the condition of the yard including fencing, walls, surfaces, and storage bays. If any maintenance is required, it will be done as soon as possible and recorded in the site diary.

2.37 Daily inspections will be carried out on the safety and integrity of the building on site, it will also be monitored throughout the working day. The daily inspections also include regular checks for dust and mud.

2.38 Detailed weekly maintenance checks are carried out and recorded on a check sheet with a status and rectification/ action record to follow up on any necessary actions, records of this will be kept on site.

2.39 The site diary will be maintained and updated to include the following: -

- Construction work
- Start and finish of daily waste management activities on site (operational hours)

- Maintenance
- Breakdowns
- Emergencies
- Problems with waste delivered and action taken
- Site inspections and consequent actions carried out by the operator
- Technically competent management attendance on site; the date and the time onto site and the time left site
- Despatch records
- Weather conditions
- Complaints about site operations and actions taken
- Environmental problems and remedial actions

2.40 The site diary will be kept in the site office and updated daily.

Contingency Planning

2.41 In conjunction with the Accident Prevention and Management Plan, the EMS includes Contingency Planning. This includes measures to be implemented if the site is forced to close due to unplanned events, or in the event of breakdowns. The procedures will be used to ensure business continuity without impacting the environment.

Accident Prevention and Management Plan

2.42 The Company recognises the importance of the prevention of accidents that may have environmental consequences and that it is crucial to limit those consequences.

2.43 An accident management plan will be maintained at the facility to ensure the facility, and facility staff are fully prepared for such incidents. The accident management plan will be reviewed at least every four years or as soon as practicable after an incident with changes made accordingly to minimise the risk of recurrence.

2.44 The Accident Prevention and Management Plan sets out the contingency measures required to deal with plant breakdowns, vandalism, fires, flooding, and bad weather. These measures are provided for the situations which could change the normal operations.

2.45 For each unforeseen event, the plan sets out the following:

- Likelihood of the accident/event occurring
- Consequence of the accident/event occurring
- Measures taken to avoid the accident occurring
- Measures taken to minimise the impact.

2.46 The EMS also provides a list of emergency contacts as well as contacts for the estate and adjoining businesses to contact in the event of an emergency.

Noticeboard

2.47 There is a noticeboard at the site entrance which provides the following information:

- The permit holder's Name
- An emergency contact name and telephone number
- A statement that the site is permitted by the Environment Agency
- The permit number
- Environment Agency telephone number 03708 506506 and the incident hotline 0800 807060

A Changing Climate

2.48 The operator is aware of the changing climate the UK is experiencing now and likely to experience in the future. With reference to the EA guidance, the UK can expect the following:

- Higher average temperatures – particularly in summer and winter
- More heat waves and hot days
- Rising sea levels
- Changes in rainfall patterns and intensity
- More storms

2.49 The Climate Change Risk Assessment is provided with ATSL-FL-ERA-V1.

Complaints

2.50 The EMS includes a complaint procedure which covers matters such as:

- Receiving/documenting the complaint
- Investigation
- Corrective Action
- Report findings
- Closure

2.51 The proposed changes will be subject to control measures to minimise any risks. The site is remote from sensitive receptors. This is a busy industrial estate occupied by waste operators and aggregate processing operators.

2.52 The complaint procedure is also set out in the DEMP.

Technical Competence and Staff Training

2.53 The operations will be overseen by a Technically Competent Manager (TCM) to ensure that cover is provided at the site. The TCM will be responsible for ensuring the requirements of continued competency is met. Certificates will be kept in the site

office. The TCM is site based and an equivalent level of cover will be supplied during holidays and unforeseen absence.

2.54 A chemist will be available to carry out the supervisory role required for hazardous waste. This role will meet the minimum requirements of having a degree in Chemistry or HNC qualified chemist. A laboratory will be established at the site for carrying out basic laboratory tests. For detailed analysis, samples will be sent to a laboratory with accreditation.

2.55 The three site based staff have all attended the HazWasteOnline Waste Classification Course.

2.56 The TCM, in conjunction with the chemist, will be responsible for the control of incoming and outgoing vehicles, checking Duty of Care documentation, keeping and maintaining all computerised records, checking in all visitors to the site, issuing Health & Safety instructions and reporting any complaints to the management.

2.57 The Compliance Manager is responsible for updating and re-issuing procedures in the EMS as necessary and ensuring all staff are trained. The Compliance Manager is also responsible for H&S matters and is accredited with IOSH.

2.58 Other site personnel will include administrative staff and site operatives. The Head Office is based at the site. There is also a separate weighbridge office and Transport Office.

2.59 All staff will be trained to a standard which enables them to perform the responsibilities and the detailed role as set out in job descriptions. The EMS provides the job description for each role including:

- Site Management
- Plant Operatives
- Site Operatives
- Administration
- Drivers

2.60 A record of staff training will be kept for each staff member which includes inductions to new processes and procedures as needed.

2.61 The following training matrix will be adopted to guide training needs.

Table 2 – Training Matrix

Training	TCM	Plant Operatives	Site Operative	Admin	Chemist
Induction	x	x	x	x	x
Accidents and Emergency	x	x	x	x	x
Amenity Management	x	x	x	x	x
Plant Training	x	x			
Vehicle marshalling	x	x	x		
Waste Acceptance / Handling	x	x	x		x
Environmental Permitting	x	x	x	x	x
Complaints and Incidents	x	x	x	x	x
Spillage Procedure	x	x	x		x
Hazardous Waste Procedures	x	x	x	x	x

Records

2.62 All records required to be made by this permit shall be comprehensible, legible, and consistent. If amendments need to be made, they are done so in such a way that any subsequent amendments remain legible. Records, plans and management systems required to be maintained by this permit shall also be kept on site.

2.63 All reports and notifications required to the permit by the Environment Agency shall be made to the Environment Agency using the contact details supplied in writing by the Environment Agency. Within one month of the end of each quarter, the operator shall submit waste returns to the environment agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

2.64 For hazardous waste, each project will have a unique reference number for tracking purposes. The project file will include; pre-acceptance checks, Site Investigation reports, classification tests, on-site checks and compliance, treatment method, outputs and dispatch, Waste Transfer/Consignment Notes.

Review Management System

2.65 The EMS will be reviewed and updated if any of the following occur:

- Any compliance issues on the site which require mitigation or management intervention.
- Changes to the site operations.
- Changes to local environment which introduces new receptors to the area.

2.66 Some changes may require staff training, this will be carried out and records updated accordingly.

Site Closure

2.67 In the event that the operations cease at the site, the operator will proceed with an application to surrender the permit. This will require a Site Closure Plan to demonstrate that activities at the site have ceased and pose no risk to the environment.

3. PROPOSED CHANGES

Waste Types and Quantities

3.1 The current permitted annual throughput is 300,000 tonnes for non-hazardous waste.

3.2 It is proposed to handle up to 50,000 tonnes of hazardous waste. Any shortfall in hazardous waste throughput, could be met by non-hazardous waste.

3.3 Overall, the site will not accept more than 300,000 tonnes per annum.

Summary of Activities

3.4 The operator has an existing permit for the physical treatment of waste. It is proposed to add the following activities to the permit:

Activity Reference A1

3.5 Section 5.3 Part A (1) (a) (vi) recycling or reclamation of inorganic materials other than metals or metal compounds

3.6 The specified activities will be:

- R5 – Recycling/reclamation of other inorganic materials

3.7 The activities will be screening and separation of hazardous waste soils for the purpose of recovery.

3.8 There will be no blending or mixing hazardous waste with non-hazardous waste.

3.9 Treatment of hazardous waste shall be carried out on an impermeable surface with sealed drainage. In addition, this will be inside a building.

3.10 No more than 50,000 tonnes of hazardous waste will be treated in any one year.

3.11 The site could treat up to 200 tonnes of hazardous waste per day.

Activity Reference A2

Section 5.6 Part A(1) (a) Temporary storage of hazardous waste within a total capacity exceeding 50 tonnes

3.12 The specified activities will be:

- R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).

- D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where the waste is produced).

3.13 Storage of hazardous waste shall be on an impermeable surface with sealed drainage.

3.14 Storage of hazardous waste will not exceed 500 tonnes at any one time.

3.15 The maximum storage time will be 6 months for date of receipt for any hazardous waste. Although it is proposed to treat the waste on a continuous basis to maintain operational capacity.

3.16 Storage will only take place inside the building, using the storage bays. This is on an impermeable surface with sealed drainage.

Activity AR 3 - Waste Operations

3.17 The waste operations will continue as per the current permit.

3.18 The physical treatment operations include manual and mechanical sorting, separation, screening, baling, shredding, washing, crushing or compaction of waste into different components for recovery. This relates to non-hazardous waste.

3.19 No more than 300,000 tonnes shall be treated in any one year.

Waste Types

3.20 Table 1 provides the list of waste to be added to the permit.

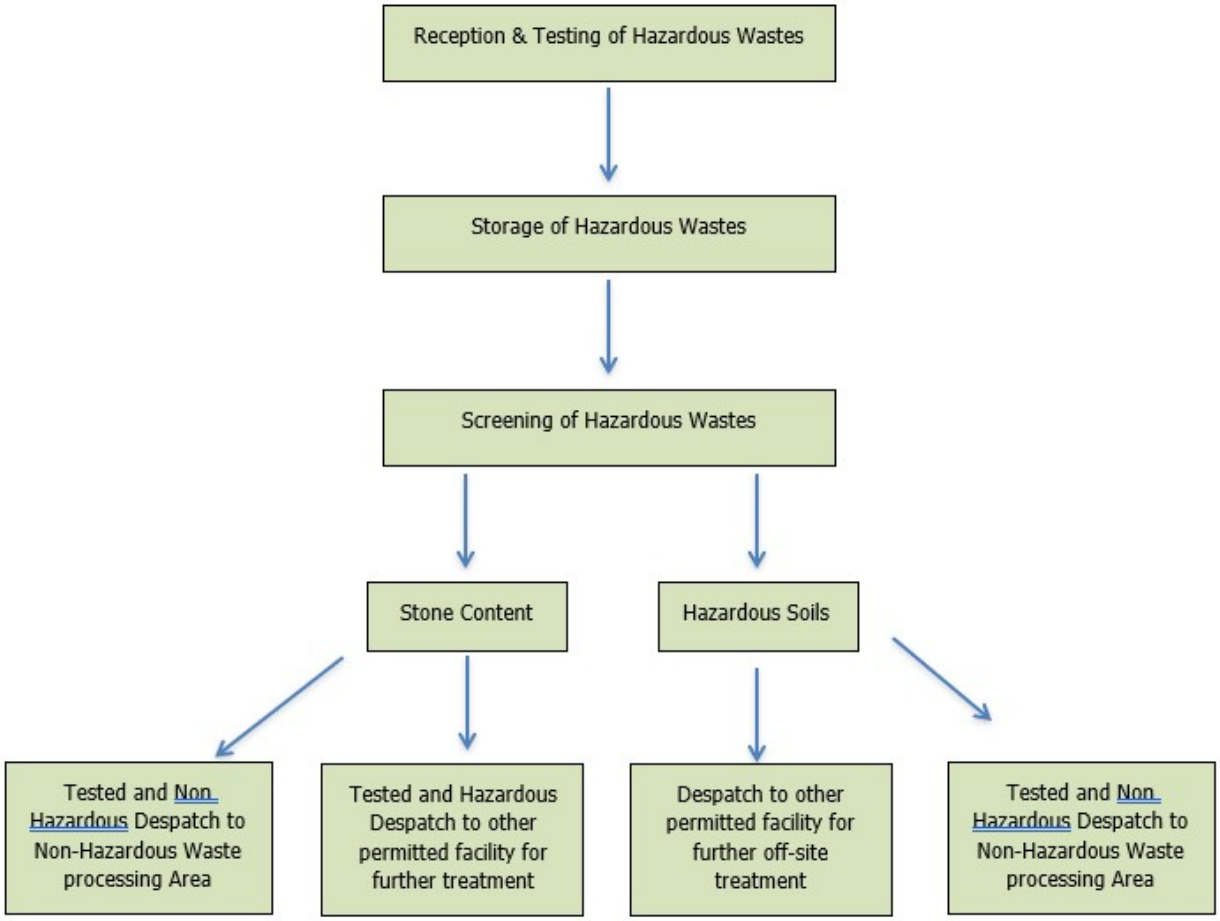
3.21 For all waste that has been screened to remove the stone content, both the soils and stones will be tested to check the hazardous properties. If the stones are classified as non-hazardous, they can be transferred to the onsite wash plant for grading.

3.22 Two grades of soil will be separated, <30mm and 30mm-80mm. Both grades will be tested and depending on the outcome will be re-classified and transferred to the appropriate onward facility. For any non-hazardous waste classified, the waste may be treated on site through the wash plant. For any batches that remain hazardous, advice will be sought from the chemist about appropriate action. This could include re-screening the waste, or it will be transferred off site for further treatment or disposal.

Process Flow

3.23 The process flow diagram is provided in Figure 1.

Figure 1 – Process Flow Diagram



4. TECHNIQUES FOR POLLUTION CONTROL

Pre-Acceptance Procedures

4.1 All incoming waste will be subject to the operator's pre-acceptance procedures. For waste, all customers will be prior approved by the operator and therefore waste will not arrive at the site without any prior notification.

4.2 All waste will be collected by the operator's own fleet of vehicles, or from pre-approved contractors. Such pre-approval will require appropriate information on Waste Carrier Licence, full training on the handling and transport of hazardous waste, and strict adherence to the on-site controls for receipt of hazardous waste.

4.3 It is the responsibility of the Sales Department to ensure that a Waste Control Form is completed by the producer. The form includes information about the process producing the waste, the chemical analysis of the waste as well as information about the quantity, physical form, EWC code and specific handling requirements.

4.4 Once the form has been returned to the Sales Department, it will be assigned a unique reference number and passed to the Hazardous Waste TCM or chemist to confirm acceptance. Once approved, a Booking Request Form will be issued to the customer to complete and confirm the consignment details. Only the Hazardous Waste TCM or chemist will confirm acceptance of the waste.

4.5 Where the constituents of the waste are not known, the TCM will arrange for a sample of the waste to be analysed. Any sampling will be undertaken by the Hazardous Waste TCM or chemist and sent to a laboratory for analysis. The laboratory will be pre-approved by the Hazardous Waste TCM or chemist, and quality assurance and control protocols checked. Analysis will be carried out using accredited techniques.

4.6 The Hazardous Waste TCM or chemist will take a sample based on the following:

1 sample per 100 tonnes

2 samples per 100-500 tonnes

2 samples plus one for every 500 tonnes, if the amount of soil is over 500 tonnes

4.7 Once it has been determined that the waste can be accepted at the site, the Waste Control Form and Booking Request Form will be completed. The project file will also include the laboratory test results and clearly identify the hazards. The project file will form part of the tracking system. This stage will complete the characterisation of the waste and can only be completed by the Hazardous Waste TCM or chemist. From this, arrangements can be made to collect the waste.

4.8 Prior to waste being accepted at the site, there will be a clear method for handling the material once it arrives on site.

4.9 There are defined treatment / disposal facilities for the onward transportation of waste. In the event of any outage at these sites, the facility has sufficient capacity to store waste pending alternative outlets. The company has a fleet of HGVs to enable transfer to other facilities if the maximum storage limits are reached.

4.10 Records for pre-acceptance will be kept at the site office within each project file. Information will be added to the file including on-site checks, treatment and dispatch.

4.11 All records will be kept for at least 3 years.

On-Site Acceptance Procedures at the Site

4.12 All hazardous waste delivered to the site will be pre-booked. As part of the pre-acceptance procedures, the booking form (Form B) will be used to provide a provisional date for collection. The date will be confirmed by the Hazardous Waste TCM or chemist once the on-site capacity has been checked.

4.13 All waste delivered to the site must be accompanied by the relevant written documentation. This will include the Hazardous Waste Consignment Note and a full description of the waste including physical and chemical composition, the hazard characteristics and handling requirements, and any compatibility issues with other waste streams.

4.14 All vehicle drivers will use the in-weighbridge to record the weight. The driver will then park in the holding area and report to the site office and produce the documentation.

4.15 The chemist will check that the documentation complies with the Pre Acceptance Form and Booking Form.

4.16 The Hazardous Waste TCM or chemist will confirm that the waste is permitted to be accepted at the site.

4.17 If the Hazardous Waste TCM or chemist discover that there are inconsistencies with the documentation, it will need to be reviewed and corrected. A Non Compliance Form will be completed.

4.18 Once approved, the site office will use radio contact to staff working in the hazardous waste building, notifying them that a delivery is expected.

4.19 The staff in the hazardous waste building will confirm to the office staff that the receiving area is clear for the delivery. The driver will then be instructed to transfer the load.

4.20 In the future, CCTV will be provided allowing office staff to check.

4.21 Once deemed acceptable, the driver will be informed to unload into a specific area or bay. As this is a pre-notified delivery, the capacity of the receiving bay would have been checked and set-aside for the delivery. The driver will leave the site once unloaded.

4.22 All delivery drivers will receive training prior to operations commencing about the hazardous waste operation. This will ensure that waste is deposited in the correct area of the site.

4.23 A sample of the waste will be obtained for analysis to confirm that the contents are as described on the paperwork. The reception and sampling area is located on an impermeable surface with sealed drainage.

4.24 For loads received from one project, the sampling regime will be as follows:

1 sample per 200 tonnes

2 samples per 200-600 tonnes

2 samples plus one for every 600 tonnes, if the amount of soil is over 600 tonnes

4.25 A random number generator will be used to select incoming loads for sampling.

4.26 For smaller projects from one-off sources which could generate one load (<20 tonnes), the TCM or chemist will check the waste against the pre-acceptance checks. For every fifth such project, a sample will be taken for analysis for verification purposes. If the TCM or chemist have any doubt about the nature of the wate, it will be sampled for analysis.

4.27 The sample(s) will be taken to the local laboratory for rapid turnaround testing. The sampling will be carried out by authorised personnel with full training.

4.28 The laboratory will carry out an air dry analysis and catwaste assessment, which combined risk assess the following HP classes form WM3.

- Oxidizing HP 2
- Flammable HP 3
- Irritant HP 4
- Specific Target Organ Toxicity/Aspiration Toxicity HP 5 Acute Toxicity HP 6 Carcinogenic HP 7 Corrosive HP 8 Toxic for Reproduction HP 10 Mutagenic HP 11 Produces toxic gases in contact with water, air or acid HP 12 Sensitising HP 13 Ecotoxic HP 14

4.29 Samples will be retained by the laboratory for two days after the waste has been removed from the site.

4.30 Once the Hazardous Waste TCM or chemist has deemed the waste to be compliant with the transfer note and permit, the on-site check paper work will be completed and the storage area/bay will be labelled with unique reference number (including date) to continue with the waste tracking.

4.31 If the waste analysis is inconsistent with the pre-acceptance checks, the Hazardous Waste TCM or chemist will confirm if the waste can still be processed using the techniques described below. If the waste cannot be treated, the waste will be quarantined in the bay (and labelled appropriately) and arrangements made to remove the waste to an authorised facility.

4.32 The customer will be notified and no further waste from that source will be accepted.

4.33 Details on waste rejection are set out below.

4.34 For all waste accepted, the verification paperwork will be placed in the project file. The storage bay / area will be labelled with information on the waste including hazard code, date received and batch number. This will continue the tracking/auditing process.

4.35 On-site acceptance will only be carried out by the Hazardous Waste TCM or chemist.

4.36 All loads will be sheeted on arrival.

Waste Rejection Procedure

4.37 Waste will be rejected if the following occurs:

- The verification process identifies contamination which is inconsistent with the pre-acceptance checks and is not able to be treated on site.
- Any waste encountered during unloading that is not permitted to be accepted.
- Any dusty loads

4.38 For waste unloaded in a bay and fails the testing, the waste will be quarantined. If possible, the waste will be removed to an empty bay, if no capacity exists, the storage bay will become the quarantined area. If necessary, a sample will be sent to a laboratory for further classification. The paperwork in the project will be checked and the producer informed that the waste is not as per the original classification. No further waste will be accepted from that producer until further checks and classification has been carried out by the Hazardous Waste TCM or chemist.

4.39 Arrangements will be made to transfer the rejected waste to another authorised facility.

4.40 The paperwork will be completed, and the project file updated with the further testing results and a completed Rejection Form.

4.41 The Environment Agency will be notified of the rejection.

4.42 Wastes comprising solely or mainly dusts, powders or loose fibres will not be accepted at the site. As part of the waste acceptance procedures, customers are informed that wastes comprising solely of dusts are not permitted. The nature of the waste is confirmed prior to acceptance.

4.43 In the event that a highly dusty load is delivered to the site, it will be subject to the rejection procedure as follows. If the delivery vehicle is on-site, the dusty waste will be re-loaded and the customer informed that it has been rejected and will need to be returned. During the re-loading, the Site Manager will activate the nearest rain gun (unless it is raining) and direct the water on to the waste and delivery vehicle. The vehicle will be immediately sheeted.

4.44 If the delivery vehicle has left the site, another vehicle will be used to reload the dusty load. The operator has a constant supply of HGV's entering the site. Whilst waiting to reload, the Site Manager will direct the nearest rain gun to the dusty load. This will remain activated during loading.

4.45 A record of the rejection will be made on the appropriate form. The customer producing the waste will be informed and arrangements to transfer the waste to an authorised facility.

Waste Storage

4.46 The Hazardous Waste TCM or chemist will ensure that there is sufficient storage capacity available for all waste streams prior to accepting the waste.

4.47 A database will be maintained in the site office will provides a running total of the storage capacity. This will allow the Hazardous Waste TCM or chemist to know how much waste is on site pending treatment, post treatment and if necessary quarantined.

4.48 There are clearly defined storage areas for different waste streams. The hazardous waste will be managed in a separate building, with separate drainage to a sealed tank.

4.49 Hazardous waste pending treatment will be stored on a batched process within 1 of 3 bays.

4.50 The nature of the waste will have a low fire risk potential. In any event, the storage bay walls will be constructed using Legio-bricks, which have a fire resistance rating of 240 minutes.

4.51 As set out in the on-site acceptance procedures, the waste will be unloaded into a storage area or bay. Waste will be received under the supervision of the Hazardous Waste TCM or chemist. Once approved, the site office will use radio contact to staff working in the building, notifying them that a delivery is being made.

4.52 Waste from similar sources will be stored in the same bay. The bay will be labelled with the contents (including hazardous waste codes), with a corresponding unique reference number assigned during the pre-application stage.

4.53 The staff in the building will confirm to the office staff that the receiving area is clear for the delivery. In the future, CCTV will be provided allowing office staff to check.

4.54 Hazardous waste will only be stored inside the hazardous waste building. The building is remote from sensitive receptors. There are no schools, houses or public rights of way near the site.

4.55 The waste building is completely within the secured protection of the waste facility.

4.56 The treatment of the hazardous waste has been designed to prevent double handling. The waste will be received in the dedicated area and treated from that location.

4.57 The storage areas and bays will be labelled as part of the tracking procedures, including the quantity and hazardous characteristics of the waste.

4.58 The waste reception area in the building will be separate from the processing and storage area (post treatment) to minimise any likelihood of cross contamination.

4.59 The storage capacity of hazardous waste inside the building will be as follows:

Table 3 – Storage Volume Hazardous Waste

Waste Area	Dimensions	Maximum Height	Volume m^3	Tonnes
Reception Area Bay A	4.0m x 6.0m	5m	80	145
Reception Area Bay B	4.0m x 6.0m	5m	80	145
Bay 0-30mm	4.5m x 3.0m	3m	40	70
Bay 30-80mm	4.5m x 3.0m	3m	40	70
Bay >80mm (stones)	4.0m x 3.0m	3m	35	50
Post Treatment Bay T1	3.0m x 4.0m	5m	40	75

*Stones will be tested and if non-hazardous, transferred to external storage bay for washing. If any hazardous residue remains, the load will be re-screened or placed into a hazardous storage bay for removal.

4.60 For waste in the storage bays, a 0.5m freeboard will be marked on the wall to delineate the height to which waste can be stored. This will help minimise waste overspilling into adjoining bays.

4.61 The bay side walls will be 5m high. The rear wall will be 5m high. The central part of the waste pile can be at 5m. Waste stored against the any wall will be at 4.5m high.

4.62 There will also be a 1m freeboard in the reception area, to ensure that waste does not leave the building.

4.63 The storage volume in each bay will be checked daily and cross-checked with the storage database to ensure capacity is maintained for planned deliveries.

4.64 The waste will be received and treated on a continuous basis to maintain capacity. No waste will be stored in a reception area for more than 5 working days. The bay label will include a received data to monitor this progress.

4.65 No hazardous waste will be kept on site for longer than 6 months from receipt.

Compatibility Testing

4.66 The nature of the waste being received will not require compatibility testing.

Treatment

4.67 The waste treatment process will involve separation of soils and stones.

4.68 This will apply to the following waste codes:

- 17 01 06* – mixed concrete, bricks, tiles and ceramics removed from a construction site. This will be screened and graded
- 17 05 03* - Hazardous waste soils will be screened to separate soils and stones.
- 17 09 03* – This corresponds to Made Ground and contaminated materials This will be screened to remove the stone content.
- 191211* Other wastes from mechanical treatment of wastes containing dangerous substances. This would apply to waste generated at other waste sites that has failed the classification and has been deemed hazardous. It will be restricted to soils and stones.

4.69 It is anticipated that waste codes 170503* and 170903* will be the main source of waste treated at the site and that these wastes will be similar in composition.

4.70 The treatment process consists of screening the waste to separate the stone content from the soil. This will create three products:

- Stones >80mm
- Soil 0-30mm
- Soil 30-80mm

4.71 The process is a separation operation. Once confirmed as acceptable, the waste will be transferred using the loading shovel into the feed hopper of the screening plant. The screening plant will grade and separate the three different sized materials into separate bays.

4.72 The stones are likely to be non-hazardous waste. These will be tested for classification purposes and if non-hazardous, they will be transferred to the non-hazardous processing area. If the stones are hazardous, they will be transferred to a holding bay pending off-site removal for recovery elsewhere.

4.73 The soils will be re-tested for classification purposes.

4.74 The building will have two hazardous waste reception bays. This will be operated on a batch process. The following scenario sets out the batch process.

- Waste will be unloaded into Bay A and clearly labelled with a date and batch number.
- A dedicated loading shovel will be used to load the screener plant. The bucket will be washed at the end of each working day.
- Waste from Bay A will be processed, this will produce three products.
- Depending on the volume of waste to be processed, the screened soil may be tested in the corresponding trommel bay.
- If capacity is required, the 0-30mm soils will be transferred to a Treatment Bay (T1). The 30-80mm will remain in situ. The stones will remain in the

oversize bay (80mm) and will be tested in-situ. Once classified and removed from the bay (either to the wash plant or off-site depending on classification), the bay will be washed down.

- Bay B will be used to receive hazardous waste soils and the process repeated.

4.75 The classification process is expected to produce the following:-

- 17 01 01 concrete
  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 01 06* for any mixtures of concrete, bricks, tiles which remain hazardous
- 17 05 03* for soils and stones that remain hazardous
- 17 05 04 for soils and stones that are no longer hazardous
- 17 09 03*for any mixed construction waste that remains hazardous
- 17 09 04 for soils, hardcore, stones that are no longer hazardous
- 19 12 09 for the removed stone only
- 19 12 12 for mechanically treated aggregate, soils and made ground

4.76 Once classified, arrangements will be made to transfer the separated materials to their onward, pre-arranged destination. For hazardous waste soils, depending on the composition and following advice from the chemist, the soils may be re-screened, or transferred off site for further treatment or landfill. The end destination for will be dependent on market conditions at the time, but the end destination will be determined as part of the waste acceptance procedures.

4.77 For any waste that is non-hazardous, it can be treated in the on-site wash plant.

4.78 The loading process will require careful handling and drop heights will be kept to a minimum to prevent dust generation. The processing plant could treat 200 tonnes per day.

4.79 Dust suppression will be implemented as necessary and in accordance with the Dust Management Procedure.

Procedure for Classifying Stone Content

4.80 The operation of this site will be a batch process. Therefore, the hazardous waste arriving at the site will be stockpiled in a bay and batched for processing through the screening plant.

4.81 If required, the stone content may be passed through the screener twice to remove as much soil content as possible.

4.82 The stockpile of stones generated will be tested as a batched sample i.e. the stones would have been removed from a batched source of hazardous waste which would have been classified prior to acceptance and again at site acceptance stages. A sample of the stones will be collected for analysis at the laboratory. The analysis will assess the stones against the original classification. Once ready for testing, the chemist will take a representative sample from the stockpile for classification. This exercise will compare the chemical properties against the original classification. Samples will be retained by the laboratory for two days after the waste has been removed from the site.

4.83 The classification process will be used to determine whether or not the stone content is hazardous. If the removal of the soil content has resulted in the stones being deemed non-hazardous, the stockpile will be transferred to the existing non-hazardous waste operation for further processing. This will be recorded.

4.84 If the classification demonstrates that the stones remain hazardous, advice will be sought from the laboratory as to whether further screening would reduce the hazardous nature by removing any residual soil content. In the event that the stones remain hazardous and would likely remain hazardous even after screening, arrangements will be made to transfer the stones to another hazardous waste facility for further treatment or transferred off site for disposal. Prior to waste being dispatched from the site, the onward receiving facility will be notified and provided with the waste testing certificates confirming the nature of the material and the EWC.

4.85 Haulage will be arranged by ATSL. The driver will enter the main site and collect the Waste Transfer Note/Consignment Note and address details for the transfer. The driver will reverse into the building and the machine driver notified by radio what materials to load. The drop height will be controlled by the machine operator to prevent dust emissions and spillages. The vehicle will be sheeted and the wheels checked by the machine operator prior to allowing the vehicle to leave. If necessary, the vehicle wheels will be cleaned using a hose and brush, by personnel with appropriate PPE.

4.86 Consignment Notes for the hazardous waste will be completed prior to leaving the site.

4.87 If the stone content is classified as non-hazardous, arrangements will be made to transfer this material to another part of the site.

4.88 Records will be kept in the site office completing the project file.

4.89 The loading shovel used for the transfer of hazardous waste soils will be dedicated to that use. If it is required for another purpose, such as loading non-hazardous waste, the bucket must be changed. Buckets will be colour coded for this purpose. In the event that material needs to be moved quicker, the bucket will be hosed down in the hazardous waste drainage system to prevent cross contamination.

Plant and Machinery

4.90 The following plant will be used at the site.

Description	Make	Model	Comment
Wash Plant	Tyrone	Bespoke	Fixed
Loading shovel	Liebherr	L556	Mobile
Excavator	Sun Ward	SW215	Mobile
Trommel	Stellux	RS182	Fixed

4.91 The plant will be maintained in accordance with the manufacturer's specifications. Any plant that is taken out of use will be decontaminated prior to removal from the site.

4.92 ATSL has access to other plant or can hire at short notice. There is also a workshop adjacent to the site which is operated by ATSL and is used to service mobile plant and road vehicles.

4.93 This is a physical treatment operation. No chemical processes take place.

4.94 The plant will be maintained in accordance with the manufacturer's specifications. Any plant that is taken out of use from the hazardous waste operation will be decontaminated prior to removal from the site.

4.95 All plant and equipment will be subject to daily checks. These are pre-operational checks carried out be trained staff at the start of each day. If there are any defects, the staff must notify the TCM. ATSL has contracted maintenance staff to repair defects. If the defect cannot be repaired within 48 hours, replacement machines will be deployed. This relates to the loading shovels and excavators only. There is a workshop on site.

4.96 If the screening plant cannot be repaired within 48 hours, soils will continue to be received until the maximum storage limits have been met. This will allow any verification testing to continue. The acceptance of soils will only re-commence when the screening plant has been repaired, and the batched soils have been processed to release new storage capacity.

4.97 In the event that any part of the process changes, for example new screening plant is to be used, the EMS will be updated. The operator will continually review changes in technology to assess future options for treatment.

4.98 ATSL has a policy of purchasing new machinery.

4.99 The machinery will be compliant with the Non-Road Mobile Machinery (NRMM) emission limits set by the Greater London Authority.

5. EMISIONS CONTROL

Point Source Emissions to Air

5.1 There will be no point source emissions to air.

Point Source Emissions to Surface Water and Sewer

5.2 The entire site is concreted and will have separate drainage systems for the non-hazardous and hazardous waste operations.

5.3 The existing drainage scheme for the main yard involves drainage falls into interceptors, with a discharge into the sewer system. There is a Consent to Discharge (reference TRIV0BK5).

5.4 The hazardous waste building will be fitted with a separated sealed drainage system. This will include water collection gullies across the open sections of the building to capture any water produced inside the building. This will be directed to a sealed tank.

5.5 The drainage system will be checked daily. For the sealed tank, once 80% full, arrangements will be made with an approved contractor to empty the tank and transfer the contents to an authorised facility. The contents will be analysed by the chemist to classify the waste before leaving the site and to ensure the receiving facility can accept the waste.

5.6 In addition to the daily checks, the tank for the hazardous waste area will be fitted within an overflow alarm. This will notify management and senior staff through a SMS system. The system will be set to provide a warning notification at approximately 80% full, followed by a further alarm at 95% full. As soon as the first notification is received, the TCM will arrange for an approved contractor to empty the tank. The operator will have a list of 2-3 companies that provide this service, which will include 24/7 emergency response. All companies will be prior approved with confirmation such as waste carrier's licence and registered office details provided.

5.7 In the event that the second warning alarm is activated, the TCM will arrange for an emergency response from a contractor.

5.8 The alarm system and tank checks will be checked daily. In the event that the alarm system fails, the tank will continue to be checked daily. If the site is going to be unmanned (for example on Sunday), the TCM will check the tank at the end of the on Friday to make sure capacity exists for the weekend. The TCM will check the weather forecast. If the tank is nearing 80% full at the end of Friday, with rainfall forecast for the weekend, the TCM will arrange for the tank to be emptied on Saturday.

5.9 During the operational hours, the alarm system will provide an audible sound to notify site staff that the first level has been reached. The site staff will notify the TCM or other senior managers. For out of hours the system will notify the senior management using the SMS service. This will allow the management team to request out-of-hours services from the contractor.

5.10 The above ground fuel tank is bunded in accordance with the regulations.

Point Source Emissions to Groundwater

5.11 There will be no point source emissions to groundwater.

5.12 The entire site is concreted with drainage.

Fugitive Emissions to Air

5.13 There is a risk of emissions to air from particulate matter. A Dust Management Plan was prepared for the non-hazardous waste operation. The dust management and mitigation measure will remain valid for the proposed additional hazardous waste treatment. A revised Dust Management Plan has been prepared for the hazardous waste operations.

5.14 The operator has implemented an Environmental Management System, and the following procedures are applicable to this activity:

- Dust Management Plan, including monitoring.

5.15 The EU Decision has been used to confirm that BAT requirements associated with this activity. With respect to the general BAT conclusions for the mechanical treatment of waste for emissions to air none of the BAT schedules relate to the proposed operation.

5.16 With regards to monitoring, BAT 8 provides the minimum monitoring frequency for various substance. However, it is only relevant for channelled emissions, which do not apply to this operation.

5.17 In terms of diffuse emissions to air, BAT 14, includes suggestions such as:

- Reducing drop heights
- Limiting traffic speed
- Using wind barriers
- Damping potential sources
- Maintenance of equipment
- Regular cleaning

5.18 All of these have been included in the Dust Management Plan.

Odour

5.19 With reference to the Environmental Risk Assessment, the likelihood of odour being generated and causing a nuisance or harm is low.

5.20 The nature of the waste being accepted is unlikely to generate odour. The site is located in a busy industrial estate, remote from sensitive receptors.

Noise and vibration

5.21 The site is in an industrial area and is surrounded by similar aggregate handling facilities.

5.22 All potential noise and vibration emissions from activities will be monitored during site opening under the supervision of the competent person, either directly or indirectly through trained staff and recorded daily using the daily site inspection form.

5.23 With reference to the Risk Assessment, there are no sensitive receptors within the locality. Without a complete pollutant linkage, the risk from noise is minimal.

6. RAW MATERIALS

6.1 Raw materials also include fuel and lubricants for plant and machinery.

6.2 Safety data sheets will be provided for all raw materials.

Waste Minimisation Audit

6.3 The operation is primarily waste transfer, storage and treatment, with the purpose of achieving recycling and minimising waste deposit to landfill.

6.4 The operator will continually review the process and implement further waste minimisation measures. This will be linked to the Environmental Management System.

Water Use

6.5 The facility is designed to manage C&D waste to produce aggregates.

6.6 The washing plant is a wet process, recycling water in the process of washing materials.

6.7 Water is used for dust suppression. This system includes the provision of a water tank to collect roof water, which can be topped with mains water during dryer weather conditions.

6.8 A water efficiency audit will be carried every four years.

Waste Recovery or Disposal

6.9 The facility is designed to manage C&D waste to produce aggregates, minimising waste production. The treatment processes have been designed to recycle as much waste as possible, manufacturing aggregates or recovering waste instead of disposal.

6.10 For hazardous waste, the treatment processes seek to remove the hazardous nature and separate the non-hazardous component from the waste (stones).

6.11 For any residual waste that fails to meet the operators testing requirement, the waste will be transferred of site for disposal.

Energy

6.12 The energy requirements are quite low for the facility.

6.13 Energy efficiency measures will be incorporated where possible into the day to day activities of the installation. However, the energy requirements are essential to the continued operation of the installation to prevent pollution and minimise environmental risks.

6.14 Energy efficiency measures will be incorporated where possible into the day to day activities of the installation. However, the energy requirements are essential to the

continued operation of the installation to prevent pollution and minimise environmental risks.

6.15 There are potential energy efficiency improvements to be made including basic energy awareness measures such as energy saving light bulbs, insulation and switching off lights when rooms are not in use. The latter can be applied to all energy-consuming appliances providing that the measure does not compromise safety or essential operating needs.

6.16 To fulfil the requirements of an EMS, a procedure will be in place that ensures the continual improvement of techniques used on site, as well as the long-term monitoring of innovative techniques that appear on the market during the life of the site. These may include further energy efficient measures, potential 'cleaner' fuel options and energy efficient systems for environmental protection.

Accidents

6.17 An Accident Management Plan is provided in Appendix A.

7. MONITORING

Dust Monitoring

7.1 Dust monitoring procedures are set out in the Dust Management Plan.

8. CLOSURE

8.1 This is a permanent facility and is unlikely to be closed.

8.2 In the event that the operations cease at the site, the operator will proceed with an application to surrender the permit. This will require a Site Closure Plan to demonstrate that activities at the site have ceased and pose no risk to the environment.

9. IMPACT ASSESSMENT

9.1 A Risk Assessment is provided as a separate report, see ATSL-FL-ERA-V1.

Appendix A
Accident Management Plan

Accident Management Plan for Hazardous Waste Treatment Operation

Prepared 05 April 2025

Next Review April 2029

Event	Likelihood of Occurrence	Consequence of Occurrence	Actions Taken or Proposed to Minimise the Likelihood or Consequences of Occurrence	Actions Planned if the Event Does Occur
Flooding based on Environment Agency indicative floodplain maps	Site is in Flood Zone 3 which has a high probability of flooding. However, the site benefits from flood defences	Danger to life. Business disruption	Operator signed up to receive Flood Warnings. If warning issued, all hazardous waste acceptance will cease, and arrangements made to remove any hazardous waste on site. Operator will offer assistance with plant and staff to help delivery temporary flood defences.	Implement Flood Warning and Evacuation Plan
Minor fires associated with machinery	Unlikely and infrequent based site procedures	Damage or injury from minor fires would be minimal with long term effect unlikely	Fire fighting equipment to be stored on site and implement fire action plan Regular maintenance of plant and machinery. Site is manned 24/7 Hazardous waste will not be combustible.	Implement fire action plan
Fires associated with storage of waste oil	Unlikely and infrequent based site procedures	Damage or injury could be significant based on nature of material.	Fuel stored in accordance with oil storage regulations. Site is manned 24/7. No change to current arrangement.	Implement fire action plan
Fires caused by arson and/or vandalism	Unlikely and infrequent	Damage or injury from minor fires would be minimal with long term effect unlikely	Site is manned 24/7. Hazardous waste will not be combustible.	Implement fire action plan,
Minor spillage caused by machinery and fuel/oil leaks from vehicles	Unlikely and infrequent	Low risk to surface water and groundwater. Localised spillage would be minimal with long term effect unlikely	Spill kits maintained in site office. Vehicle manoeuvring will be controlled. Regular maintenance of plant and machinery.	Implement spillage action plan
Major spillage caused by machinery and fuel/oil leaks from	Unlikely and infrequent	Low risk to surface water and groundwater. Localised spillage would be minimal with long term	Spill kits maintained in site office. Vehicle manoeuvring will be controlled.	Implement spillage action plan

Event	Likelihood of Occurrence	Consequence of Occurrence	Actions Taken or Proposed to Minimise the Likelihood or Consequences of Occurrence	Actions Planned if the Event Does Occur
vehicles		effect unlikely	Regular maintenance of plant and machinery.	
Explosions	Very Unlikely	Damage to People, atmosphere, buildings	Waste subject to pre-acceptance and acceptance procedures. There will be no mixing of incompatible wastes. In the event of an explosion, the operator will implement the Emergency Procedures.	Call emergency services

Appendix B – Environmental Policy

SHARP 01708 555 666

Environmental Policy

Requirement: To maintain safe and healthy working conditions that do not impact the environment.

Purpose: To reduce the risk of environmental incident, accidents, injuries and cases of ill health and help ensure the health, safety and welfare of anyone affected by our operations.

Demonstration: Our Environmental Policy is in place to reduce the probability and severity of work-related environmental incidents, accidents, injuries and causes of ill health.

We believe that businesses are responsible for achieving good environmental practice and operating in a sustainable manner.

We are therefore committed to reducing our environmental impact and continually improving our environmental performance as an integral and fundamental part of our business strategy and operating methods.

It is our priority to encourage our customers, suppliers and all business associates to do the same. Not only is this sound commercial sense for all; it is also a matter of delivering on our duty of care towards future generations.

Our policy is to:

- Wholly support and comply with or exceed the requirements of current environmental legislation and codes of practice.
- Minimise our waste and then reuse or recycle as much of it as possible.
- Minimise energy and water usage in our buildings, vehicles and processes in order to conserve supplies, and minimise our consumption of natural resources, especially where they are non-renewable.
- Operate and maintain company vehicles with due regard to environmental issues as far as reasonably practical and encourage the use of alternative means of transport and car sharing as appropriate.
- Apply the principles of continuous improvement in respect of air, water, noise and light pollution from our premises and reduce any impacts from our operations on the environment and local community.
- As far as possible purchase products and services that do the least damage to the environment and encourage others to do the same.
- Assess the environmental impact of any new processes or products we intend to introduce in advance.
- Ensure that all employees understand our environmental policy and conform to the high standards it requires.

Version 2

Date of Review: 23/09/2022
Reviewer Name: Terence Sharp
Approver Name: Emma Sharp

- Address complaints about any breach of our Environmental Policy promptly and to the satisfaction of all concerned.
- Update our Environmental Policy annually in consultation with staff, associates and customers.

Dust Emissions

Dust analysis sampling is carried out at a frequency agreed with the Environment Agency. These samples are submitted for professional analysis and the results forwarded to the EA. Dust emissions are monitored during waste handling operations, and by means of a daily site inspection, the findings of which are recorded in the site diary.

Dust emissions are controlled by means of strategically placed sprinklers and water atomiser

Surface Water

The ground surface of the entire yard area is constructed of an impermeable material, and of sufficient structural strength to withstand impact and loading from stored waste, plant and equipment and the activities at the site. The surface is designed, constructed maintained and drained so that there is no accumulation of surface water and any drainage flows unimpeded ony to and thence within the drainage system at the site.

No dangerous substances are handled on the site.

All surface water is collected in an interceptor and passed through a separator prior to being discharged into the main foul sewer.

Spillages

Bulk fuel storage is bunded and away from main drainage. Spill kits are located by fuel and oil storage locations.

In the event of a spillage in the yard area, 'fines' is taken from bulk stock and used as an absorbent. This would then be isolated on site and removed to an appropriate location for disposal.

Litter

Effective measures are taken to prevent litter from being blown from the site to anywhere outside the site and to ensure that the site, including its boundaries, is kept clear of litter and other debris irrespective of its source.Litter emissions are monitored by means of a daily site inspection, the findings of which are recorded in the site diary

Noise emissions

Noise emissions are monitored by means of a daily site inspection, the findings of which are recorded in the site diary.

An industrial noise assessment has been carried out by an independent external assessor, and the findings demonstrate that no excessive noise emmissions are evident beyond the perimeter of the site

Odour emissions

Putrescible waste is not normally handled at the site and offensive odours are not normally regarded as a problem. An assessment of odours forms part of the daily site inspection, the findings of which are entered in the site diary. When an assessment indicates that there is discernible odour at or beyond the site boundary attributable to the site, measures will be taken to reduce or ameliorate any odour from activities authorised on the site

This Policy is:

- Documented and reviewed
- Retained
- Communicated

Implementation

This Policy shall be effective immediately from the date of signature.

Review Date

This Policy will be reviewed annually but may be subject to change due to legislation or events before that time line in which case the relevant information will be included thereon

Signed Terence Sharp

Position Managing Director
Date 23/09/2022