Environmental Management System Operational Procedures

Land at Salamons Way, Rainham, RM13 9UL

Reference: MGR-EMS-OP-01 Version 2

January 2025

DOCUMENT CONTROL SHEET

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	Operational Procedures	
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1. INTRODUCTION

1.1 Purpose

The purpose of these procedures is to guide staff and contractors in the safe conduct of their duties in a manner which controls the environmental impacts of the company's operations. The procedures cover normal operations on site and should be read in conjunction with the Contingency Procedures provided.

1.2 Responsibilities

The Director has the overall responsibility for ensuring that operating procedures are prepared for the operations and are communicated throughout the organisation.

The Site Manager is responsible for maintaining operating procedures for the facility.

The Technically Competent Manager (TCM) is responsible for compliance and ensuring the operational procedures remain up to date. The TCM will also be responsible for reporting data to the Environment Agency.

1.3 Scope

The procedures cover the activities carried out at Salamon's Way, Rainham, RM13 9UL.

These Operational Procedures cover:

- Physical Treatment of non-hazardous waste
- Storage and transfer of non-hazardous waste

The site will primarily be used to receive, store and treat some waste glass and receive and store UPVC for transfer. Clean plate glass will be used to produce cullet.

1.4 The Operator

May Glass Recycling (MGR) is a family run business with over 25 years experience in glass recycling. The company used to specialise in flat glass i.e. windscreens, double glazing and aquarium glass, but have extended this to include all glass.

As part of their involvement with double glazing companies, MGR also collect and store UPVC.

MGR provide a collection service, providing skips or larger containers for developers to source segregate waste glass or UPVC.

The glass collected by MGR will be stored and transferred to specialist sites for recycling. The clean plate glass will be treated on site to produce cullet. The UPVC will be stored and transferred to a specialist facility for recycling.

The company has achieved ISO9001 and 14001 for quality and environmental management systems.

2. MANAGEMENT OF OPERATIONS

2.1 Site Layout and Signage

The permitted site will cover two properties at Salamons Way, Rainham, RM13 9UL (No. 5 and No. 10), centred at NGR TQ51335 81469. A site location plan is provided on Drawing No. MGR-SW-EP-01. The Site Layout is provided on Drawing No. MGR-SW-LAY-01.

No. 5 Salamon's Way will provide the office and will be the main reception for visitors and deliveries. There is a weighbridge at this site. This site will be used for glass storage and producing cullet.

No. 10 Salamon's Way will provide additional storage capacity, including UPVC, and will be used to treat the double glass to remove the aluminium strip.

Staff will only conduct operations in the appropriate part of the site, following instructions provided by the Site Manager.

At the entrance to the main site, a sign board will display the following information:

- Permit holder's and Operator's name.
- An emergency contact name and the Operator's telephone number.
- A statement that the site is permitted by the Environment Agency.
- The permit number.
- Environment Agency national numbers, 03708 506506 and 0800 807060 (incident hotline)

The sign will be kept in good order to ensure it is legible.

A copy of the Environmental Permit and a copy of this document will be kept in the site office.

2.2 Security

Both sites are secured by concrete walls, fences and lockable front gates.

There is no rear access to either site.

All gates are locked when sites are not manned.

There will be CCTV around both sites. The site manager can access the images through a mobile phone.

The site security shall be fully inspected at the commencement of each working day. Any defects or damage shall be made secure by temporary repair by the end of each working day and shall be repaired with 7 working days of the damage being detected.

All inspections, defects, damage and repairs shall be recorded in the site diary.

Both sites will be secured when unattended. Visitors shall be directed to the site office and required to sign in on entry and make their presence known to a member of staff and will be escorted around the sites. Visitors will sign out before departure. Unauthorised visitors who fail to adhere to company rules will be escorted from site and a record of the event made in the site diary.

If during the site checks, there is evidence of unauthorised access or vandalism, the plant and equipment will be checked. In the event that machinery has been damaged or stolen, which will affect the day to day operations at the site, the Site Manager will make arrangements for replacement parts. If the operations cannot continue, the Site Manager will cease accepting those wastes affected by the cessation. For example, if equipment has been stolen or damaged which prevents the operator from crushing glass, that part of the activity will cease pending replacement equipment. The storage and transfer will continue.

There may be other instances when the Site Manager needs to consider closing the site, and these are discussed in Contingency.

2.3 Technical Competence and Training

The overall operations will be overseen by a Technically Competent Manager (TCM). The TCM will be responsible for ensuring the requirements of continued competency is met. A copy of the Certificate will be kept at the site office.

In addition to the TCM, there is a Site Manager.

The Site Manager will be responsible for checking Duty of Care documentation, keeping and maintaining all computerised records, checking in all visitors to the site and issuing Health & Safety instructions.

The TCM and Site Manager are also responsible for:

- Investigating any incidents or non-conformances or complaints in accordance with the relevant procedures and reporting forms.
- Ensuring that required data is provided to the Environment Agency at the agreed frequency.
- Completing the site diary and daily checks.
- Ensuring all operational staff have a suitable induction to the site and have had the relevant training for the plant and equipment.
- Maintaining Staff Training Records.
- Ensuring all staff are familiar with safe operation of all necessary aspects of the site, relevant to their specific roles.

Other site personnel will include site operatives.

It is the responsibility of Site Operatives to:

- Act in accordance with the instruction given to them from the TCM and Site Manager.
- Follow these operational procedures for all stages of waste handling.

- Report any incidents or non-conformances to the TCM or Site Manager.
- Ensure all equipment used on site is checked before use each morning for signs of wear and tear which could compromise health and safety or environmental protection. Any issues with equipment or the condition of the site must be reported to the TCM or Site Manager immediately, before the equipment is used. The TCM or Site Manager will request contractor to repair plant. A note will be made in the Site Diary.

There may be occasions when sub-contractors are required to carry out maintenance or other works at the site.

It is the responsibility of all sub-contractors to:

- Report to the site office before carrying out any duties on site.
- Comply with Site Induction briefing.
- Comply with the site rules:
  - Comply with instructions given by site operatives.
  - To ensure that the correct PPE is worn when not in the vehicle.

All staff will be trained to a standard which enables them to perform their responsibilities. The following Training Matrix will be used to determine training needs.

Table 1 – Training Matrix

Training Needs for Each Role	TCM / Site Manager	Plant Operatives	Site Operatives	Administration Staff	Drivers
Induction	X	X	X	X	X
Accidents and Emergency	X	X	X	X	X
Fire Action Plan	X	X	X	X	X
Amenity Management	X	X	X	X	
Plant Training	X	X	X		
Vehicle marshalling	X	X	X		
Waste handling	x	X	X		
Environmental Permitting	X	X	X	X	
Complaints and Incidents	X	X	X	X	
Spillage Procedure	X	X	X		X

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

2.4 Site Records

A record of the types, quantities and dates of wastes deposited at the site under the Permit will be maintained and provided to the Environment Agency at three-monthly intervals, within one month of the end of each period.

A copy of all records including transfer notes, consignment notes and weighbridge records will be maintained in the site office.

2.5 Site Diary

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

- Significant events with dates
- Start and finish of site activities
- Planning maintenance and breakdowns
- Emergencies
- Rejected vehicles and details
- Dispatch of records to the Environment Agency
- Weather conditions, including temporary site closure
- Daily vehicle deliveries
- Any environmental problems and actions taken
- Any complaints
- Records of site monitoring
- Records of waste taken from site, either liquid from the interceptor tank or waste requiring onward transport for treatment

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

2.6 Inspection and maintenance

The Site Manager is responsible for inspecting the storage areas and preventative maintenance will be undertaken according to the daily checklist.

Road vehicles will be checked before use using the DVSA Vehicle Safety Defect Form.

Machinery on site is visually inspected by the operator before it is used. This is covered in training for staff and operatives. In addition, mobile plant checks must be carried before being used. Any defects will be reported to the TCM and recorded in the Site Diary.

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.

2.7 Routine Cleaning

The site is subject to regular cleaning. The need for cleaning forms part of the Daily Site Checks. Any noticeable requirements are carried out each day. Staff are trained to continually clean the working areas throughout the day.

Both sites are concreted allowing for easier cleaning.

A cleaning schedule is provided in Table 4.

2.8 Site Drainage

Both sites are concreted with drainage. There is an underground tank on each site.

There are aco drains across the site entrances, which direct water into the corresponding underground tank.

The water level in the tank is checked weekly or following a period of intense rainfall. Arrangements will be made with a contractor to empty the contents of the tank.

3. WASTE HANDLING PROCEDURES

These procedures cover the receipt, storage and treatment of waste glass, and the receipt and storage of UPVC. The following waste codes will be permitted.

Table 2 – Permitted Wastes

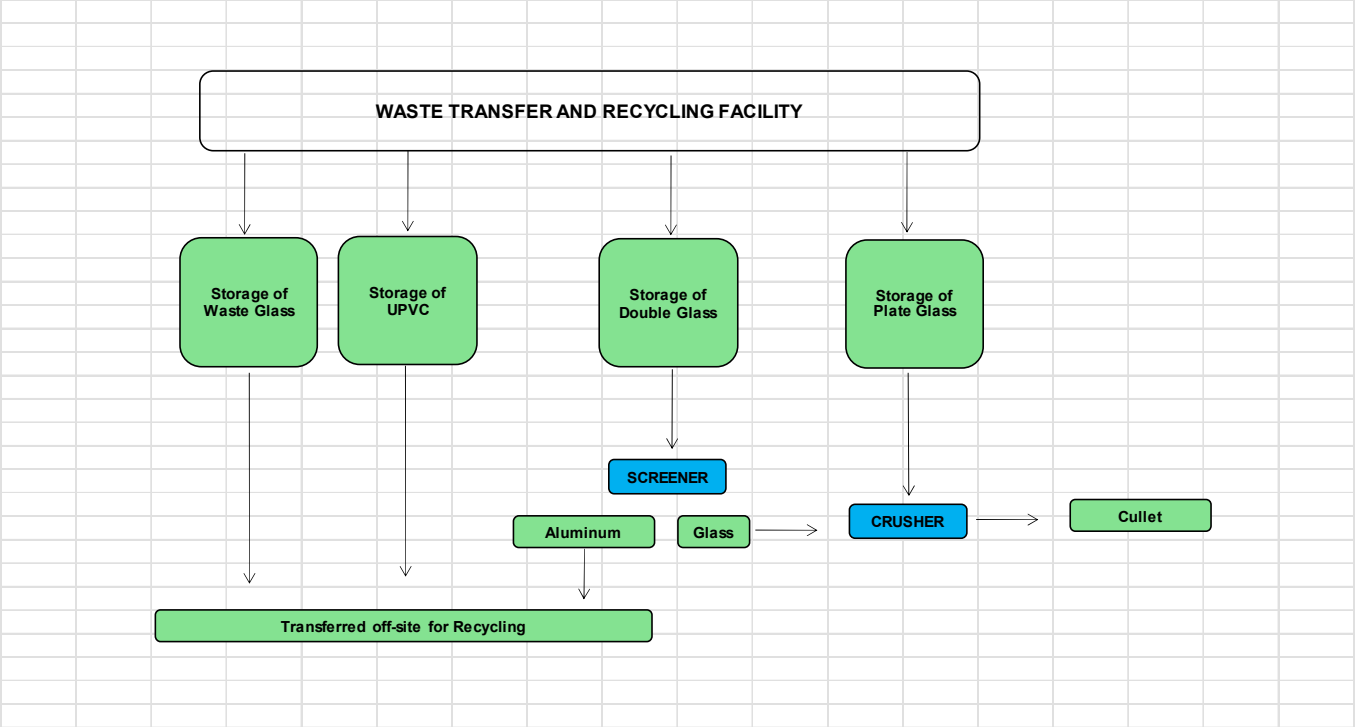
EWC Code	Description	Comments
150107	Glass packaging	Clean Plate glass to be crushed.
160120	Glass	Double glass to be screened to separate aluminium.
170202	Glass	
191205	Glass	All other glass will be stored and transferred.
191212	Mixed waste containing Glass	
200102	Glass	
170203	UPVC	Stored
170904	UPVC with glass and metal	Glass removed and stored
191204	UPVC	Stored
200139	UPVC	Stored

Highlighted waste code to be either transferred or treated on site.
All other waste for transfer only.

The annual throughput will be 80,000 tonnes.

The process flow diagram is presented in Figure 1.

Figure 1 – Process Flow Diagram



3.1 Pre-Acceptance Procedures

The operator handles a specific waste stream, and this is made clear when receiving enquiries about waste collection. The site staff will inform all customers that the site is only permitted to receive waste glass and UPVC. This will reduce incidents of non-compliance waste being received.

Waste delivered by the operator's own vehicles:

- Source of waste known at time of booking.
- Checks made on acceptability of waste.
- Customer informed of acceptable waste types before booking confirmed.

Waste delivered by third party waste contractors:

- Details of carriers licence checked.

3.2 Site Acceptance Procedures

The company will only accept wastes which are allowed under the permit. A copy of the permit will be kept at the site office. The site is a specialist facility and therefore it is unlikely that non permitted wastes will be delivered to the site.

All delivery vehicles will be weighed on the weighbridge. Once weighed, the driver will be informed about which bay to unload the waste. This could be either at No.5 or No.10. Unloading will be overseen by a banksman in either site.

As the waste is unloaded any non compliant waste identified will be removed.

Glass produced at Material Recycling Facilities (MRF)

Glass produced at MRFs can be classified as 191205 Glass, or 191212 Waste Glass containing other non-hazardous waste. The producer (MRF operator) will be required to classify the waste glass leaving their site.

Before accepting a new contract for the supply of waste glass, a representative of MGR will visit the source site and visually inspect the glass. Samples will be collected for analysis. The mixed glass is typically from large Material Recycling Facilities, collecting and managing waste on behalf of Local Authorities.

MGR will request the previous 12 months testing data generated at the source site. MRF sites are required to carry out output sampling.

MGR will carry out compliance checks to confirm the correct code has been used. With reference to the guidance[1], the decision should be made on a case by case basis.

For each MRF, MGR will review the site's Waste Acceptance Procedures and check their procedures for removing non-compliant waste such as vapes and batteries.

The waste acceptance procedures at the MRF will be important to ensure that any mixed glass containing non-hazardous waste (EWC191212) is non hazardous. The MRF operators also work with Waste Collection Authorities to inform residents and businesses about the materials that can be placed in the collection bin. This will help reinforce the position that batteries and vapes should not be placed in the recycling bin.

With reference to the Environment Agency guidance, when the composition of the waste and its components is widely understood not to include hazardous substances, and visual inspections would easily identify materials likely to be hazardous, then the waste assessment may not need to include sampling and testing.

Prior to removal from the MRF, the waste producer will carry out periodic sampling to confirm the weight of glass, and other components. At this stage, the visual assessment will allow the operator to remove any non-compliant waste such as batteries and vapes.

The MGR site only has capacity to store a low volume of this glass. This will allow the site operatives to check the waste as it is unloaded, and to manually remove any non-compliant waste.

1 Glass from waste treatment facilities, Guidance LIT 72733, published 21 May 2024.

Single source collected glass

Before accepting a new contract for the supply of single source glass, a representative of MGR will visit the source site to visually inspect the glass and check the procedures for generating it. For other glass streams this could include garages which remove car windows for example.

The double glass contains an aluminium strip. This will be stored separately pending treatment.

The clean plate glass will be source segregated and stored in a designated bay. Once sufficient quantities have been stored, it will be crushed to produce cullet.

UPVC

UPVC will be generated from companies manufacturing new UPVC and generate off-cuts. It will also be sourced from glaziers involved in replacing doors and windows. For these projects, the UPVC will be segregated at the source.

UPVC may also be generated from house refurbishment projects which is placed into a skip and transferred to a waste recycling facility. The UPVC will be separated and transferred to MGR for storage pending transfer to a specialist UPVC recycling facility. Any glass will be removed and separated.

3.3 Non-Permitted Waste

A general waste bin and a skip will be provided at each site to store any non-permitted waste.

As part of the production of cullet, the crushed glass will be passed on a conveyor through a manual picking station. Staff will remove any small fragments of non-compliant waste (mainly small fragments of plastic). These will be placed into buckets, which will then be transferred into the general waste bin.

All staff will receive training to identify non-compliant waste.

3.4 Waste Transfer Note Documentation

For the transfer of waste including the collection and delivery of all wastes, the company shall use their pre-printed Transfer Notes.

All relevant information required on the transfer notes will be completed by the relevant staff member.

3.5 Waste Storage

3.5.1 Waste Glass

Waste glass will be stored by type in dedicated storage bays. Storage bays will be constructed using concrete legio bricks (or similar), or concrete A-Frames.

No waste will be stored higher than 3m.

No more than 2,000 tonnes of waste glass will be stored at any one time (1,000 tonnes on each site).

Waste will be stored by type to keep different waste glass separate for the purposes of recycling at other sites.

3.5.2 UPVC

The site will store UPVC in a dedicated bay. Any residual glass within the UPVC frame will be removed. The UPVC will be bulked for transfer to an authorised treatment facility.

The storage limits are set out in Table 3.

The specified waste management operations include waste disposal and waste recovery operations listed Annex IIA and IIB of The Waste Framework Directive 2008/98/EC and are:

- R3: Recycling or reclamation of organic substances.
- R4: Recycling of metals
- R5: Recycling or reclamation of other inorganic materials.
- R13: Storage of waste pending recovery

Table 3A – Waste Storage (5 Salamons Way)

Waste Type	**Storage Area**	**Max. Pile Height**	**Maximum Storage Volume**
Mixed Plate	10m x 7m 70m^2	3m	150m^3
Clean Plate	10m x 7m 70m^2	3m	150m^3
Windscreens	10m x 7m 70m^2	3m	150m^3
MRF Glass	9m x 5m 45m^2	3m	100m^3
Cullet	6m x 7m 45m^2	3m	100m^3

Note: volume not based on uniform dimensions. Bays will be interchangeable depending on market conditions. The storage limits will be the same.

Table 3B – Waste Storage (10 Salamons Way)

Waste Type	Storage Area	Max. Pile Height	Maximum Storage Volume
Double Glass	4m x 5m 20m^2	3m	40m^3
Double Glass	4m x 5m 20m^2	3m	40m^3
Metal	4m x 5m 20m^2	3m	40m^3
Glass	6m x7m 42m^2	3m	80m^3
Glass	6m x7m 42m^2	3m	80m^3
Glass	6m x7m 42m^2	3m	80m^3
UPVC	6m x 2.5m 15m^2	2.1m	31.5m^3
UPVC	6m x 2.5m 15m^2	2.1m	31.5m^3

Note: volume not based on uniform dimensions. Bays will be interchangeable depending on market conditions. The storage limits will be the same.

The storage bays will be checked daily to ensure that the capacity is maintained. Once any bay is 75% full, arrangements will be made to transfer the glass. For the clean plate glass, the bays will be checked and when the bay is 50% full, the glass will be crushed.

3.6 Waste Treatment

The clean plate glass will be crushed and sorted to produce cullet, in accordance with the WRAP protocol for the production of processed cullet from waste flat glass.

The process involves loading the clean plate glass into the feed hopper of the crushing plant. The crushed glass will fall onto a conveyor belt which transfers this into an enclosed picking station. Here, staff will remove any non-compliant waste. Typically, this includes small fragments of plastic. The plastic will be placed into buckets and then transferred into a larger holder bin/container.

There is also an overband magnet to remove any metal. This will fall into a standard sized skip.

The crushed glass continues along the conveyor belt into a concrete storage bay. A final visual check is carried out before the cullet is dispatched.

The double glass contains an aluminium strip. This glass will be screened to separate the glass from the aluminium. The glass will collect beneath the screen and will be transferred to the crushing plant.

The site is on a busy industrial estate. The operational hours are:

Monday to Friday 0700-1800
Saturday 0700-1300
No Operations on Sunday or Public Holidays

These hours are consistent with other business users on the estate.

3.7 Waste Dispatch

All wastes sent for recovery or disposal will be accompanied by the relevant Waste Transfer Note or Consignment Note if hazardous waste.

3.8 Planned Preventative Maintenance

The operation will use the following equipment:

- Crusher x1
- Screener x1
- Material Handler x2
- Loading Shovel x2
- Forklift x1

A programme of routine planned maintenance will be provided for each item of plant and machinery, to prevent breakdown and faults.

All faults which require corrective action will be reported to the TCM to be implemented.

The plant and equipment will be subject to service agreements with the manufacturer and/or supplier. Where appropriate, these agreements will include a 24 hour call out facility.

3.9 Fuel

Any fuel on site will be stored in accordance with the Oil Storage Regulations. The fuel will be stored in a bunded tank, capable of storing 110% of the total capacity. The tank will be checked daily as part of the site checks.

All staff will be trained in the safe refuelling of plant.

The tanks and bunds will be subject to regular inspections as part of the daily site checks, See EMS-FR-01.

3.10 Routine Cleaning

The site will be subject to regular cleaning. Typically, this will involve daily sweeping of the yard area, with a more detailed clean at the weekend. The weekly clean will involve checking each waste bay and around the perimeter wall. The cleaning schedule is provided in Table 4.

Table 4 – Cleaning Schedule

	Daily	Weekly	Annually
Full Site Check	✓		
Vehicle Wheels	✓		
Site Entrance	✓	✓	
Site Access	✓	✓	
Storage Bays – concreted	✓	✓	Full site Audit
Mobile plant, crusher, screener	✓	✓	

The need for cleaning will form part of the Daily Site Checks.

The TCM will nominate a site operative(s) to be responsible for carrying out these tasks. The TCM will follow up any complaints or incidents with a full inspection.

The TCM will be responsible for arranging the Road Sweeper on a weekly basis, or at an increased frequency if required.

3.11 Contingency

To ensure operational capacity is maintained, MGR will ensure it has:

- A list of plant hire companies to source alternative equipment and spare parts if required.
- A list of alternative facilities to take the waste.
- A list of contractors to carry out repairs.
- A list of suppliers for spare parts and materials.

MGR recognise that if any aspect changes, there is a potential risk that waste storage capacity will be exceeded. Such triggers could be:

- Plant breakdown
- Staff absences
- Road traffic delays which cause surge in deliveries or delays in waste collection

To reduce the likelihood of these events occurring, MGR will implement the following.

At the start of each week, the Site Manager will check how many skips are on hire and their anticipated exchange/collection date. This will help to manage the capacity on site and arrange for staggered collections.

Plant and machinery is subject to routine maintenance. The company can use plant on each site to help with any breakdowns.

MGR has approved contractors for carry out repairs and for hiring machines.

MGR is a family run business, with established staff. Staff leave is staggered to ensure that senior management will always be available. If necessary, agency staff will be used to meet any short term staff shortages.

MGR has staff that are trained in multiple disciplines allowing them to be redeployed to assist when needed. For example, a mobile plant machine operator can also drive HGVs.

The Site Manager and/or TCM will review the weather forecast at the start of each working week. If there is a Met Office warning for storm conditions and high rainfall, the Site Manager will check the drainage and if necessary arrange for the tank to be emptied.

During such conditions (with a weather warning), the TCM/Site Manager will decide if it is safe to process clean glass at the site, or to wait until conditions improve.

4. EMISSIONS MANAGEMENT AND MONITORING

4.1 Introduction

An Environmental Risk Assessment has been prepared for all operations at the site. These procedures are based on the risks identified in the Risk Assessment. See document MGR-ERA-V2.

4.2 Fugitive Emissions to air – dust, mud and litter

The site has been designed to prevent dust emissions being created and leaving the site boundary. A Dust Management Plan has been prepared as a separate report MGR-EMS-OP-02.

The following procedures will be implemented to prevent emissions to air from waste handling.

- Vehicles to be sheeted on arrival and before leaving the site.
- Unloading will be overseen by a banksman to prevent vehicles tracking through any deposited waste.
- Low likelihood of tracking due to nature of the waste.
- Vehicles leaving the site will be checked and a hose and brush will be used to clean the wheels. This will be available on both sites.
- Both sites are concreted.
- Storage of waste within concrete bay walls and profile boards providing 3.5m barrier height. The waste will be stored with a 0.5m freeboard against the rear and side walls.
- Speed restriction of 5mph on site limit dust arising from waste vehicles and mobile plant.
- As part of the site daily checks, the Site Manager will check the entire site for evidence of any debris and arrange cleaning as required. The site will be cleaned in accordance with the Cleaning Schedule.
- Use of bowser and trailer to dampen working yard.
- Mobile plant will be cleaned, with a full clean at the end of each week.
- Dust suppression fitted to conveyor on crushing plant.
- Dust Suppression sprays to be installed around the site to dampen stockpiles during drier weather conditions.
- Weather forecast review. The TCM will check the weekly forecast at the start of each working week. If the Met Office issues a weather warning for high wind, the TCM will arrange for the crushing operations to cease during that time. Waste manoeuvring will also be curtailed. If the forecast is for moderate wind, the TCM will decide on the day to determine what activities can take place.

- If the Met Office issue a weather warning for drought conditions, the TCM will arrange for additional water storage capacity using IBCs. Each IBC can hold 1,000 litres of water.
- Drop heights will be reduced to mininise dust emissions.
- Stockpiles will be dampened.
- Crushing and Screening will only take place periodically. This allows the TCM to delay operations in the event of poor weather conditions (dry and windy).

Dust Suppression

Dust sprinklers will be installed around the storage bays. The position of each sprinkler is indicated on Drawing No. MGR-SW-LAY-01. The sprinklers will have a range of 13.5m, which is also shown on the plan. This shows that the storage bays will be covered by the sprinkler units.

During dry weather conditions, the sprinklers will be activated to dampen the stockpiles and to dampen any material whilst it is being unloaded or loaded.

The production of cullet involves a crushing unit which feeds into an enclosed picking station. The crushing unit will have its own spray bar fitted.

In addition, the operator has access to a trailer and bowser for spreading water on to the operational yard. This will be deployed to target any yard areas not reached by the dust sprinklers.

With reference to Environment Agency guidance, the following steps have been taken into account through this DEMP to prevent material escaping from stockpiles.

- Dust Suppression will be used to dampen stockpiles.
- The site has been designed to minimise wind whip and to contain all material.
- There are defined storage limits which will be checked daily.
- Storage bays constructed using legio bricks or concrete A-frames. Most waste stored will be whole units with low likelihood of dust generation.
- The storage of cullet will be within concrete bay wall.
- Monitor weather conditions and cease treatment operations during windy conditions.
- For Met Office warnings for high wind, the TCM will not operate the crusher. Stockpiles will be dampened in preparation and arrangements made to reduce the height of stockpiles or remove stockpiles from the site.

The TCM will review the weather forecast at the start of each working week. This will provide an indication of the potential risk from dust generation and the mitigation measures required.

<u>Control of Mud and Debris</u>

The nature of the operations will not generate mud.

The waste glass and UPVC will be in a solid state.

The site will be concreted, which provides an easier surface to keep clean.

Unloading will be overseen by site staff to prevent vehicles tracking through deposited waste.

Before exiting the site, all vehicles will be stopped and visually inspected by trained staff to reduce the risk of any debris being tracked off-site.

The deposit of material on the access road or public highway will be treated as an emergency and will be cleared immediately by the operator using either a brush and shovel or vacuum tanker/road sweeper.

It is proposed to deploy a road sweeper on a weekly basis as a minimum to clean the entrance area and yard.

There have been no reported complaints associated with the operations on the existing site.

Litter

The site has a low probability of generating litter. This is not associated with the waste being handled. However, the site operatives will carry out daily litter checks and collect any litter/debris associated with the use.

4.3 Odour

The waste being handled has a low likelihood of producing odour. There are no nearby receptors. The nearest residential receptors are nearly 1km north of the site. There have been no reports of complaints associated with the current use.

4.4 Noise and Vibration

The site is in the busy Ferry Lane Industrial Estate. The nearest residential receptors are nearly 1km north of the site, separated by the A13.

The site is located south of the A13, surrounded by other industrial users, including waste operations. Fairview Industrial Estate is a large industrial estate located to the west of the Ferry Lane Industrial Estate. A large Wastewater Treatment Works is also located close to the industrial estates.

The Inner Thames Marsh SSSI is located 100m southwest of the site, separated by other industrial premises.

Due to the site location and distance from sensitive receptors, no formal noise monitoring is required. The following good practices will be implemented as summarised in Table 5.

Table 5 – Noise Management Procedures

Measures	Specification
Operational procedures	Crushing operations during working day time hours. Screening operations during working day time hours. Reduce drop heights when loading. Crushing does not take place every day. Screening does not take place every day. Regular Maintenance of all plant and machinery. Both sites have concreted surfaces which reduces noise associated with vehicles travelling on uneven surfaces. Engines switched off when not in use. Staff training to ensure machine operators drive plant without unnecessary throttle. Speed limits on both sites.
Physical containment	Concrete storage bay walls provide perimeter barriers and internal containment.
Noise monitoring	Not necessary. No history of noise complaints.

4.5 Fugitive emissions to groundwater

There will be no point source emissions to ground, surface water, air or land.

4.6 Potentially Polluting Leaks and Spillages

Any fuel on site will be stored in accordance with the Oil Storage Regulations. The fuel will be stored in a bunded tank, capable of storing 110% of the total capacity. The tank will be checked daily as part of the site checks.

Vehicle manoeuvring will be controlled by a banksman. This will reduce the likelihood of vehicles being damaged that could cause a leak/spillage. All site based and road-based vehicles will be subject to maintenance.

Any minor spillages shall be cleaned immediately, using sand or appropriate spill kits. In the unlikely event of a major spillage, immediate action shall be taken to prevent contamination entering surface drains, watercourses and un-surfaced ground. The contamination shall be cleared immediately and placed in sealed containers. The Environment Agency shall be informed immediately, and the details of the event recorded in the site diary.

4.7 Pests, Vermin and Birds

Pests, vermin and birds are not typically associated with these waste streams. In the event of any sign of infestation, the operator will commission a pest control contractor to visit the site,

carry out an inspection and implement control measures. A record will be made in the site diary.

4.8 Monitoring

As there are no point source emissions to environmental media, monitoring is not required.

4.9 Complaints

The Site Manager has the overall responsibility for reporting and dealing with complaints.

The administration staff will all be responsible for handling complaints and recording on the correct form. All complaints must be referred to the Site Manager.

In this context, a complaint may be received directly from a resident, customer or from a Regulator.

When the site receives a complaint, a record will be provided in the Site Diary.

All staff based in the office will be trained on recording complaints and to make sure they notify the TCM immediately.

The TCM will review the activities that may have given rise to the complaint. Other actions will include:

- Review of site diary and check for any an unusual regional weather events occurring during the day on which the compliant was made, for example Saharan dust storms.
- Review site diary and establish what site activities were taking place at the time the complaint even occurred.
- Review waste types accepted that day.
- Identify whether there were any other activities in the area taking place that could have generated dust e.g. road works or construction works.
- If it is established that the emissions were attributable to activities being undertaken at the site, as necessary review the relevant operational procedures and implement improvements and provide additional training to site.
- The action taken will be reported to the Environment Agency.

The Site Manager will report the findings to every complainant and implement appropriate corrective action in accordance with a specific management plan or the Operational Procedures.

The TCM will aim to provide feedback to each complainant within 48 hours of receiving the complaint.

The TCM will report all findings to the senior management team at the monthly meeting, or sooner if the complaint findings require urgent intervention.

If the site receives several substantiated complaints, the operator will engage the services of an Air Quality specialist to review the site operations and update this DEMP accordingly. A

substantiated complaint is one where the TCM has visited the complainant and confirmed that dust has left the site boundary and impacted their property (glass dust on cars, windows etc). The EA may also provide substantiated complaints.

5. ADDITIONAL MEASURES

5.1 Raw material inputs

A bunded fuel tank will be provided on site. This will be positioned outside, away from site operations. It will be stored in accordance with the Oil Storage Regulations.

5.2 Waste Minimisation Audit

The operation is primarily waste storage and treatment. The treatment process is specifically designed to recover waste.

5.3 Waste Recovery or Disposal

The operator will continue to consider making efficiencies in its processes to ensure the diversion of waste from disposal and movement up the waste hierarchy. This will be linked to the Environmental Management System and the company's ISO14001.

5.4 Water Use

Water will be used to provide dust suppression, although this will be minimal. No water will be used in the process.

5.5 Energy Efficiency

Energy efficiency measures will be incorporated where possible into the day to day activities of the operations. The energy requirements for the site are low.

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.

The operator will ensure 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.