



Management System Summary

Recorra Limited



Helping clients prosper through compliance

SITE DETAILS

Units 38/39 Juliette Way,
Purfleet Industrial Park,
Purfleet,
Essex,
RM15 4YA

OPERATOR DETAILS

Recorra Limited,
52 Lant Street,
London,
SE1 1RB

PERMIT REFERENCE

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FIGURES

FIGURE	TITLE
Figure 1	Visual of MRF treatment process

DRAWINGS

REFERENCE	REV	DATE	TITLE
K529.1~20~001		17/04/2026	Permit Boundary
K529.1~20~002		05/11/2025	Sensitive Receptors Plan (1km buffer)
K529.1~20~003		04/11/2025	Site Setting Plan
Recorra Site Layout Plan		17/03/2026	Site Layout Plan
K529.1~20~004		17/04/2026	FRS Route Plan
BPR1001/05/04		08/12/2021	Drainage Plan

1 INTRODUCTION

This document is a Summary of the Management System that accompanies the application for a normal Variation to the existing Environmental Permit (EPR/EB3135AD); the variation seeks to amalgamate and amend the existing Standard Rules permit and S2 Exemption to a Bespoke Environmental Permit for a Waste Operation in accordance with the associated Environment Agency guidance¹.

The site is operated by Recorra Ltd and is located Units 38/39 Juliette Way, Purfleet Industrial Park, Purfleet, Essex, RM15 4YA, and the National Grid Reference is TQ 55146 79591. The site is completely underlain by an impermeable concrete surface. The site contains 1 main warehouse of modern construction in addition to a courtyard area currently used under the S2 Exemption. The permitted area will be extended to incorporate this area.

The site is situated on an established industrial estate (See Site Setting Plan (K529.1~20~003). The site location is shown on the Permit Boundary Plan (K529.1~20~001).

Operations at the site involve the receipt, storage, treatment and dispatch of predominantly non-hazardous waste, although there will be a small proportion of hazardous wastes to be stored on site, and outlined in the List of Waste (K529.1~09~008; 009). The waste operations are subject to the requirements as stipulated in the Environmental Permitting (England and Wales) Regulations 2010 (as amended), and those associated with the respective current Standard Rules Permits. Treatment operations are limited to baling, shredding and manual (including mobile plant assisted) sorting/separation and compaction.

Operations at the site are currently covered by the following Standard Rules Permits plus a Waste Exemption;

- Standard Rules SR2008No14_75kte – Materials Recycling Facility
- Standard Rules SR2008No23_75kte – Waste Electrical and Electronic Equipment Authorised Treatment Facility (ATF) excluding ozone depleting substances
- S2 waste exemption WEX474918: storing waste in a secure place

The aim of this application is to amalgamate the above Permits and Exemption, while adding additional EWC codes consisting of hazardous and non-hazardous materials.

¹ [Develop a management system: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/develop-a-management-system-environmental-permits), updated 3 April 2023

The source of these waste streams is from building clearances allowing for the acceptance and storage on site of all likely items cleared. Additional streams sought as part of this variation may not necessarily form a consistent feedstock onsite but are required owing to the diverse potential wastes discovered as part of fulfilment of clearance contracts.

See the List of Waste (Complete) (K529.1~09~008) for all waste that will be accepted and stored onsite. See List of Waste (New Codes) (K529.1~09~009) for all new codes including the S2 exemption codes.

The S2 exemption is currently covering the yard area to the south of the building. The permit boundary will therefore be amended to accommodate these activities. See Permit Boundary Plan (K529.1~09~001).

The application has been prepared by Wiser Environment Limited on behalf of the applicant Recorra Ltd.

2 PURPOSE AND SCOPE OF MANAGEMENT SYSTEM

Recorra Ltd operates a Materials Recycling Facility (MRF) and Waste Electrical and Electronic Equipment Authorised Treatment Facility (or WEEE ATF) located at Units 38/39 Juliette Way, Purfleet Industrial Park, Purfleet, Essex, RM15 4YA. Recorra Ltd also holds a S2 Waste Exemption (WEX474918).

Operations at the site involve the receipt, storage, treatment and dispatch of predominantly non-hazardous waste, although there will be a small proportion of hazardous wastes to be stored on site. Wastes are delivered to the facility by a combination of heavy and light goods vehicles. Treatment operations are limited to baling, shredding and manual (including mobile plant assisted) sorting/separation and compaction.

Recorra Ltd operates the Facility under an Integrated Management System (IMS). The IMS is certified to the ISO 14001, ISO 9001 and ISO 45001 Standards and audited annually by UKAS approved auditors, NQA. This external verification ensures that all company policies and procedures are working correctly and are well maintained.

The scope of this Management System Summary (MSS) extends to all operations associated with the acceptance, handling, treatment and storage of waste at Units 38/39 Juliette Way. The wastes permitted to be accepted at the facility are detailed within the List of Waste (K529.1~09~009).

The site is operated in accordance with management procedures and controls outlined within this MSS which has been produced in accordance with the Environment Agency (EA) guidance, '*Develop a Management System: environmental permits*².

The benefits of operating an effective and efficient Management System are to ensure sustainable business practices, reduce risks and losses, reduce operational costs, to help obtain business and a good reputation, and to ensure legal compliance.

A controlled copy of the MSS will be available at Units 38/39 Juliette Way, Purfleet Industrial Park, Purfleet, Essex, RM15 4YA. Recorra Ltd will ensure that copies of all relevant permits and approved supporting documents are provided to all personnel with nominated responsibility for the management or control of the site. The locations of the documents will

² [Develop a management system: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/develop-a-management-system-environmental-permits), updated 3 April 2023

be made known to all relevant personnel and will always be readily available for inspection by regulatory bodies when the site is operational.

The key contact regarding the operation of the site's Environmental Permit is:

Technically Competent Manager		
Name: Lyndsay Edwards	Telephone: 02079408276	e-mail: lyndsay.edwards@recorra.co.uk

3 SITE INFRASTRUCTURE

3.1 Location

The site address is Units 38/39 Juliette Way, Purfleet Industrial Park, Purfleet, Essex, RM15 4YA. The facility is located at the southern end of Purfleet Industrial Park and occupies an industrial unit which was formerly occupied by the Ensign Bus Company.

The industrial park is situated to the west northwest of the areas of Purfleet and West Thurrock, Essex, directly south of the A13 and A1306 London/Arterial Road. The site can be found at National Grid Reference: TQ 55146 79591.

3.2 Site Layout

All waste treatment and the majority of storage operations will be undertaken within the main industrial building upon an impermeable surface. Externally, to the west, south and east of the main building, these concreted surfaced areas will be utilised for traffic access, weighbridge, traffic egress and fuel and water storage. Access to and egress from the site will be undertaken from the main access road (Juliette Way) from the south. Vehicles will travel along the southern elevation and enter the building on either the southern or western elevations (after using the weighbridge) exiting back along the southern elevation. See Site Layout Plan (K529.1~20~004) for exact locations.

The waste operation development comprises of a main waste treatment building and offices (Industrial Unit), external circulation and access roads, of which Juliette Way is shared with other operations on the northern side of Purfleet Industrial Park. Upon entrance to Juliette Way, the entrance roadway leads to a surface mounted weighbridge situated on the southeastern corner of the main building. The entrance doorway to the main building is situated just to the north of the weighbridge along the eastern elevation of the building.

There is some external storage of inert materials at the side and rear of the building (southern and western elevations respectively). There are 2 external bays for the storage of hazardous waste from building clearances. This waste is either containerised or segregated from other associated waste streams.

The site is bounded by London Road (A1306) to the northeast, the main London to channel tunnel railway line to the southwest, and the remaining buildings associated with the other occupiers of the Purfleet Industrial Park to the north and south.

The predominant land use surrounding the wider area of the site is industrial with some commercial and residential areas separated by low grade agricultural (grazing) land. The site forms part of the existing industrial / commercial land use associated with the former use.

The nearest residential properties are located to the south of the site situated off the A1090 Arterial Road at a distance of approx. 35 m.

Only inert wastes are stored externally and/or are containerised, and the majority of waste storage and treatment activities take place within the building.

3.3 Construction Procedures & Supervision

Any construction work, infrastructure improvement and replacement will be undertaken by a specialist contractor. A suitably qualified Civil and/or Structural Engineer will inspect works to ensure that all necessary standards and specifications are met.

3.4 Maintenance and Inspection

Daily inspections are conducted of the facility and site boundary. The facility is inspected daily by the Yard Managers or other nominated representatives of the Environmental Permit holder for defects in plant, equipment or structure or in any working practice that may affect satisfactory compliance with the Environmental Permit. Inspections are undertaken by staff suitably qualified and / or experienced in day-to-day operation of the facility. The main points of inspection shall include:

- Waste storage levels;
- Waste type storage area separation;
- Cleanliness;
- Site emissions;
- Leakages/Spillages;
- Monitoring data (where relevant);
- Tanks, pipes and bund contents; and
- Integrity of buildings, site surfacing, drainage systems and security provisions.

Should a problem be identified, the Senior Shift Supervisor, or delegated staff, will arrange immediate repair or other appropriate remedial action.

Records shall be kept of daily inspections and shall be made available for inspection as reasonably required by authorised officers of the EA. Any defects shall be rectified promptly.

In addition, an annual audit of working procedures will be conducted internally. The audits will be used to identify non-compliance and monitor progress of corrective action. The SHEQ Director will review details of the audits. Copies of the audits will be kept in the site office.

4 PERMITTED ACTIVITIES

The following waste management operations are carried out at the facility, which are in line with those classed as Permitted Activities from the Standard Rules Permits (SR2008No14_75kte, SR2008No23_75kte) and S2 Waste Exemption (codes taken from Waste Framework Directive 2008/98/EC Annex II).

The permitted operations on site are listed below in Table 1.

Table 1: Permitted activities R & D codes description and limits

Description of Activities		Limits of Activities
R3	Recycling or reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes).	Treatment consisting only of manual and mechanical sorting, dismantling, separation, screening, grading, baling, shredding, crushing, compacting, repair or refurbishment, or cutting of waste into different components for recovery. Storage prior to processing/dispatch.
R4	Recycling or reclamation of metal and metal compounds.	
R5	Recycling or reclamation of other inorganic materials.	
R13	Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection on the site where the waste is produced).	
D15	Storage pending D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced).	

The facility allows for the recycling of co-mingled and source separated recyclates (paper, cardboard, glass, plastics, metal (e.g. cans) and food waste) and used electrical and WEEE wastes. Recyclates will be treated (e.g. separation, sorting, baling and bulking) and used electricals and WEEE wastes will be prepared for re-use and broken down into component parts for recycling. As part of the paper recycling, a confidential shredding operation will also take place within a secure designated area within the main treatment building. (The Secure Shredding Unit (SSU)).

The facility can be broadly divided into the types of materials it processes, namely recyclates and WEEE waste.

4.1 Treatment Process

Operations are undertaken within the main building ensuring that any emissions to air, land or water (dust, noise, liquids) from the storage and/or processing of waste materials is negated and managed in accordance with environmental requirements.

Figure 1 below outlines the MRF plant through the treatment process, in visual form.

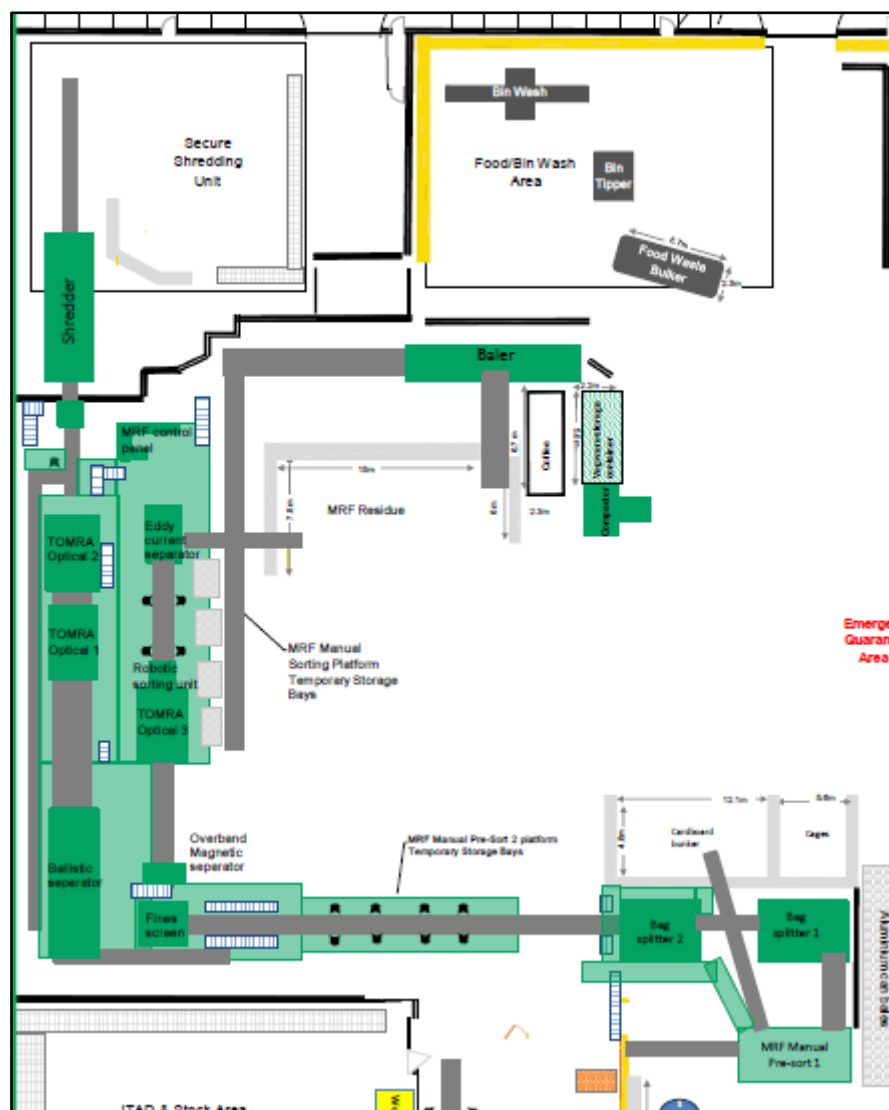


Figure 1 Visual of MRF treatment process

4.1.1 Mixed Recyclates Treatment

The main operational processes treatment associated with the mixed recyclates are as follows:

- Pre-treatment storage
- Co-mingled recyclate separation
- Recyclate treatment consisting of manual & automated sorting, separation, and screening within the main building
- Baling, shredding and compaction of waste into different components for recovery
- Confidential shredding of paper-based documents and preparation for recover
- Storage and/or Container loading for removal off site

4.1.2 Used electricals and WEEE Waste

The main operational processes treatment associated with used electricals and WEEE waste are as follows:

- Separate storage and reception of used electricals and WEEE Wastes pending treatment
- Treatment of used electricals and WEEE wastes consisting of sorting, dismantling, separation, shredding, screening, grading, shearing or cutting of materials in preparation for recovery
- Preparation and treatment of used electricals and WEEE wastes for re-use
- Storage and/or Container loading of used electrical and WEEE waste components in readiness for off-site removal

4.2 Food Waste

Food waste arrives at the facility source segregated in wheeled bins with lids. The majority is further contained inside by tied biodegradable sacks. Equipment such as forklift, bin lift, power washer, RORO vehicle are available for processing food waste.

When processed it is first transferred into intermediate containers to provide the food waste operative with an opportunity to remove any non-biodegradable contamination prior to tipping into the bulk storage container. Food waste remains in the intermediate containers for no longer than 4 hours and the containers are washed down at the end of each day.

The bulk storage containers are fitted with sealed lids, which are opened for the tipping of food waste from the intermediate containers and then closed immediately after to limit emission of odour and attraction of insects and other pests. Food waste will be stored in the bulk storage containers for a maximum of 72 hours, with an average storage time of 48 hours.

4.3 Compostable Packaging

Compostable packaging is received in source segregated and co-mingled forms. Upon receipt compostable packaging will undergo basic sorting prior to storage within an enclosed compactor. The material is bulked until an economic load is achieved and subsequently transferred directly to a re-processor.

The nature of the material means it is likely that there will be contamination with food, which represents the potential odour risk. All processing of compostable material is undertaken within a building and stored within the compactor therefore limiting any potential for fugitive odour emissions to be liberated.

4.4 Storage of Waste

Waste material will be stored in its largest form for as long as practicably possible before treating and moving it off site. Waste is stored externally and internally. See the Site Layout Plan for the locations of these storage areas. See Section 6.3 for details of handling and storage.

5 ANNUAL WASTE QUANTITIES

The maximum annual throughput is 100,000 tonnes. The waste tonnage split is categorised as follows:

- Materials Recycling Facility (SR2008No14) – 75,000tpa
- WEEE Authorised Treatment Facility (SR2008No23) – 25,000tpa

This is not to change with the permit variation as annual throughput will still fall within this threshold.

6 RECEPTION, HANDLING & STORAGE OF WASTE

The following section describes the operational techniques that are implemented on site to control the release of any potentially polluting substances to the environment during reception, handling and storage of the waste.

All operations and working practices are regularly reviewed and improved where necessary. There are robust mechanisms in place for investigation of incidents/accidents if they occur.

6.1 Pre-Acceptance Procedure

The majority of materials delivered to the site will be from Recorra's own waste collection vehicles although there will be some element of deliveries from other trade organisations.

Recorra will obtain the following information from the customer/waste producer to enable consideration of the waste load prior to acceptance on site. This information is required for all new waste enquiries:

- Waste description, including European Waste Catalogue (EWC) code;
- Description of the process producing the waste;
- Variations to the process;
- Method of transport/delivery; and
- The typical waste composition of the waste.

Sufficient data will be gathered for each waste stream to be technically assessed prior to delivery to the waste facility. A tracking system will be employed at the pre-acceptance stage to ensure that incoming waste can be verified during acceptance. The tracking of loads allows the schedule of work activities to be rigorously maintained. In addition, each load will possess a unique identifying number, which will be provided to the waste producer. This information will be retained as a record for a minimum of 3 years.

A pre-acceptance procedure is followed in accordance with [SGN S5.06³ section 2.1.1].

6.2 Waste Acceptance

The acceptance procedures verify and characterise the waste as it arrives at the waste facility. Wastes will not be accepted at the waste facility unless an assessment has been made of the suitability for treatment and recovery.

³ [Sector Guidance Note S5.06: recovery and disposal of hazardous and non-hazardous waste - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/375063/SGN_S5.06_recovery_and_disposal_of_hazardous_and_non-hazardous_waste_-_GOV.UK.pdf), updated 10 October 2018

Wastes will be delivered to the facility by a combination of heavy and light goods vehicles. Deliveries and dispatches will be via the A1306 London/Arterial Road and A1090 New Tank Hill Road onto Purfleet Industrial Access Road, to the south of the site. On entering Juliette Way, signs will direct vehicles to the site weighbridge. See Site Layout Plan.

The weighbridge deck is monitored directly from the weighbridge office within the main building. Waste is only accepted at the site if it is in accordance with the Waste (England and Wales) Regulations 2011 and the Hazardous Waste (England & Wales) Regulations 2015, and in accordance with the site's Environmental Permits and the associated List of Waste (K529.1~09~008; 009).

A record is kept of the date and time of waste deliveries, quantities and the nature of the waste deposited at the site, the name of the company and their representative delivering (if applicable) each load of waste and the vehicle registration number.

Wherever practicable, each load is inspected visually at the weighbridge office, by the trained, nominated person to determine the basic characteristics of the waste. Subject to verification, the waste is accepted into the site.

If the waste is unsuitable, the load remains on the vehicle for immediate off-site transfer. Should a load be deposited and found to be non-compliant, and the producer/carrier has left the site, this load will be re-containerised and placed in the load quarantine area awaiting collection for delivery to a suitably permitted facility. Such events will be recorded in the site diary and the EA informed.

All drivers must be wearing appropriate Personal Protective Equipment (PPE) before beginning the unloading process. All procedures include written instruction on how to undertake tasks, equipment involved, PPE/safety equipment required and potential hazards. Each procedure is accompanied by an activity risk assessment.

6.3 Handling & Storage

The site is equipped with mobile plant (e loading shovels, forklifts, and telehandlers). All equipment is periodically inspected in accordance with manufacturers' guidance and manuals to ensure the plant and equipment is available for work when required.

All waste materials are stored on impermeable concrete surfacing. Incoming waste materials will be stored in segregated bays according to their waste type.

When Duty of Care checks are satisfactorily completed at the weighbridge, vehicles will enter the building and are directed to the appropriate storage area for specific waste types prior to treatment.

First in, first out principles will be employed at the waste facility reception areas to ensure good management of waste and to prevent excessive storage times.

It is envisaged that the total storage capacity for wastes accepted will not exceed 5,000 tonnes at any one time. All records are maintained for a minimum of 3 years following recovery or disposal.

Spill kits are provided in the main processing building and externally, next to the diesel tank. They are also provided for within the site stores for distribution across the site as deemed necessary following on from the regular site inspections.

6.3.1 Internal Storage

The main recycling building has three reception areas for incoming waste:

- 1) MRF/WEEE ATF,
- 2) Secure Shredding Unit
- 3) Food Waste Bulking

Waste is then segregated by type to separate storage bays or containers over an impermeable surface for further sorting and processing.

This material will then be put through the treatment process and separated into their constituent parts. Post treatment storage will be in dedicated bays and/or appropriate containers. See Site Layout Plan.

The internal storage areas are fully contained. An area of the building is set aside for wash down activities of containers and vehicles, and all drainage within this area will fall to a sump and discharge to foul sewer. External drainage of areas not utilised for storage or treating of wastes (including clean roof drainage) will discharge fugitively to the local hydraulic regime.

Used electrical and electronic equipment and WEEE wastes will be stored in a segregated manner ready for treatment and/or collection and further recycling at an appropriately permitted facility. All used electricals and WEEE wastes will be treated and stored within the dedicated IT Asset Disposal (ITAD) Unit which is situated within the main treatment building, and sited on an impermeable concrete surface. Used electrical and WEEE wastes will be stored for durations prior to recovery or disposal in accordance with the relevant Standard Rules Permit as currently permitted.

Pile sizes will be minimised. The height of waste stockpiles will not exceed 3.5 m. A minimum freeboard level of 1 m will also be applied across all storage bays including those positioned

below the picking stations. Regular inspections throughout the day will aim to minimise spillage out from the bay.

Beneath the MRF conveyor picking stations, there are interim storage bunkers for depositing separated waste streams during the sorting process. These bays are emptied as needed throughout the day. No materials will be stored in these bays overnight.

6.3.2 External Storage

External storage of waste consists of a container with glass and a hardcore skip as well as rigid plastics and wooden pallets. Two hazardous waste storage areas are also external in the form of bays in the yard area outside. Hazardous waste storage consists of empty gas canisters, paint and cleaning products.

Other external storage relates to metal and plastic bins for the operations, diesel and COSHH. The diesel tank supplies fuel for all onsite plant and our fleet of waste collection vehicles. The tank is double skinned and is sited within a further bund to provide the required primary, secondary and tertiary containment.

All storage of wastes and non-wastes is illustrated on the Operational Layout Plan (drawing BPR1001/05/03).

6.4 Waste Dispatch

Any waste leaving the site will be accompanied by a written description, and due diligence checks will ensure that they are transferred to a suitably permitted waste management facility, by a registered waste carrier.

7 WASTE SAMPLING METHODOLOGY

The facility is a notified Materials Facility and is required to undertake regular sampling of both incoming and outgoing waste material in accordance with Part 2, Chapter 2 of Schedule 9 of the Environmental Permitting (England and Wales) Regulations (Amendment) 2023.

Incoming waste qualifies as 'waste material' as it is similar in nature to household waste, is collected for recycling, consists of mixed and single streams, and contains one or more regulated material types (glass, metal, paper, card, plastic, fibre-based composites). Once separated, these are treated as 'specified output material'.

The Procedure is outlined below in the table below:

WASTE SAMPLING PROCEDURE	SPECIFIC STANDARDS
Suppliers	Incoming waste is almost exclusively collected and delivered by Recorra Ltd; the facility is therefore considered a single-supplier site.
Variation and Seasonality	Material composition is broadly consistent year-round, with small reductions in August and December and a small seasonal increase in glass in December.
Input Material Types	The facility accepts all 10 regulated input materials and classifies each as target, non-target or non-recyclable.
Input Sampling	Sampling is carried out on dry mixed recycling (DMR) and baled cardboard. Other source-separated materials (e.g. glass, heavy metals/plastics, secure paper, paper towels, fibre-composites) are excluded due to sampling impracticality, security requirements, or H&S considerations.
Output Sampling	Output sampling is undertaken on the sorted metal, paper, card, plastic and fibre-based composite streams. Securely shredded paper and compostable packaging are excluded. Residual waste is also sampled voluntarily as good practice.

WASTE SAMPLING PROCEDURE	SPECIFIC STANDARDS
Collection and Storage	Samples are collected inside the facility into orange 1100L bins dedicated for sampling only. Samples are generally analysed immediately; if not, bins are labelled with sample date, time, material type and weight.
Training	Only trained operatives undertake sampling. A visual guide supports consistent identification of target, non-target and non-recyclable materials, including packaging and drinks containers.
Sampling Process	Sampling is undertaken in a designated indoor area fitted with platform and bench scales, a 50mm mesh screen and access for materials handling. All scales are calibrated annually.
DMR Sampling	Loose and bagged materials are taken randomly to achieve a representative sample (points-of-compass technique or random section). Bags are opened and sorted into the defined input material types, followed by secondary breakdown into target / non-target / non-recyclable fractions.
Baled Cardboard	Random bales are opened and either fully sampled or part-sampled until the required sample weight is reached. One 60kg sample is taken per 75 tonnes received.
Specified Output Materials	Samples are collected from bunkers beneath the MRF by mobile plant and analysed using the same approach as input materials. Recyclable fractions are returned to bunkers; other materials go to residual.
Data Recording	Sampling sheets capture date, time, material type, grade and sample weight. Supplier details and weighbridge information are held separately but available on request.
Schedule	A quarterly-reviewed schedule ensures sampling at the correct frequency and across different days/times to ensure randomness.

WASTE SAMPLING PROCEDURE	SPECIFIC STANDARDS
Reporting	Sampling data is submitted quarterly to the Regulator as combined waste returns for both input and output materials.

8 SITE & EQUIPMENT MAINTENANCE

The Site Layout Plan shows the locations of all fixed plants.

The waste facility has a static MRF plant (see Figure 1), this equipment consists of loading hopper, bag perforator, delivery conveyor, elevated picking stations, fines screen, ballistic separator, optical sorting equipment, over band magnet, material baling press, and two bag splitters with a robotic sorting unit; and for the Secure Shredding operation – static plant including feed and transfer conveyors and shredder unit.

Mobile waste handling equipment including loading shovels, forklifts, and telehandlers will also be utilised where appropriate. All lifting equipment is inspected and tested by an external auditor on an annual basis.

The site weighbridge is located adjacent to the eastern elevation of the main treatment building. Weighing equipment is inspected and tested on annual basis by an external auditor in accordance with the Weight and Measures Act 1985.

All equipment is periodically inspected in accordance with manufactures' guidance and manuals to ensure the plant and equipment is available for work when required.

The site is operated in accordance with written procedures incorporated within the Recorra Ltd management system.

All procedures include written instruction on how to undertake tasks, equipment involved, PPE/safety equipment required and potential hazards. Each procedure is accompanied by an activity risk assessment.

The site manager also maintains a register of all calibrations of measuring and monitoring devices. All calibrations are undertaken by an approved subcontractor.

8.1 Site Operational Procedures

The site is operated in accordance with a number of written procedures incorporated within the Recorra Ltd Company Management System.

All procedures include written instruction on how to undertake tasks, equipment involved, PPE/safety equipment required and potential hazards. Each procedure is accompanied by an activity risk assessment.

8.2 Training

All new employees are given full induction training by the Senior Shift Supervisor, Driver Resource Supervisor, Supervisors or other appropriately qualified person(s) as appointed by

the Managing Director and will be recorded in individual personnel records. It is the responsibility of Senior Management and the Technical Competent Manager to ensure that no unauthorised persons operate equipment on site. Staff will be trained to ensure that they are competent to undertake their respective duties.

Particular attention will be given to familiarisation of staff with the Environmental Permit for the site, the potential emissions from the site and the prevention of accidental emissions. Training will be tailored to individual requirements.

Individual operators have access to the operation and maintenance manuals of the equipment they use.

8.3 Site Security

All reasonable precautions are taken to prevent unauthorised access to the site. The main access point to the site is from Juliette Way via the main entrance to Purfleet Industrial Park. The site can also be accessed via Purfleet Industrial Access Road (off New Tank Hill Road). Both routes are shared by other users of Purfleet Industrial Park.

During operational hours, the main access gate to Purfleet Industrial Park, to the southeast of the site, is kept open for staff, customers and visitors and wider users of the Industrial Park. The main access gate is kept secure out of hours, with a mobile patrol carried out by the estate security team. The rear access gate is locked between 19:00 - 07:00.

The Industrial Park is bounded by a combination of steel palisade and fencing and landscaped hedge lines. Metal gates have been installed at the front of Recorra's premises, restricting access to the Transport Yard and access road surrounding the building.

The operations are undertaken exclusively within a large building which will be kept secured (locked) during out of hours. The IT Asset Disposal and Secure Shredding Units have an alarm system which is fully armed outside of operational hours.

The integrity of the boundary fence line, entrance gate and perimeter structures are inspected on a weekly basis. Any damage to the integrity of any security structure, where practicable, will be repaired by the end of the working day. If it is not possible to make repairs within a working day, temporary repair measures will be implemented. Final repairs are carried out within 7 days of the damage being detected or any other such period as agreed in writing with the EA. All damage and repairs (temporary or permanent) are recorded in the Site Diary.

9 ACCIDENT PREVENTION & MANAGEMENT

The Environmental Risk Assessment (K529.1~09~003) identifies the foreseeable risks on site and provides details on how risks will be controlled.

Potential accidents and incidents have also been identified within Table ERA13 of the Environmental Risk Assessment (ERA) (K529.1~09~003), where management procedures and controls are identified to reduce any identified risk.

Any accident or incident that has caused, is causing, or may cause significant pollution will be recorded, and the Environment Agency notified as soon as practicable.

These will be investigated by a senior manager and where action is identified as being required, this will be recorded; responsibility will be allocated; preventative or corrective actions specified, and completion required within a defined timeframe.

Control measures detailed within the ERA include:

- Site is secured by fencing and gated and CCTV can be monitored remotely 24/7;
- Intruder and fire alarms are linked to ARC;
- All vehicles delivering waste are sheeted or enclosed.
- Waste deliveries and site operations shall be overseen by the Technically Competent Manager or nominated competent person;
- Unloading of waste will only be undertaken in designated areas;
- All treatment of waste is undertaken within the building, on an impermeable surface with a sealed drainage system.
- Appropriate training regarding process/plant operation and emergency procedures is provided to all relevant staff;
- Plant and equipment will be maintained in accordance with their maintenance schedules or when applicable;
- Storage tanks are checked as part of daily site inspections for integrity or signs of leakage;
- Fuelling of plant is to be undertaken on an impermeable surface with a suitable spill kit and fire extinguisher available; and

The site will be managed in accordance with the minimum operating standards detailed in the Fire Prevention Plan (K529.1~09~002).

Accident prevention and management will be reviewed on an annual basis along with the Management System or following an accident.

10 ENVIRONMENTAL CONTROLS

10.1 Odour Controls

Overall risk: Medium

Residual risk (after application of management measures): Low

The only waste types accepted that could lead to the emissions of odour are food wastes which will be strictly controlled. The control measures to manage dust and fugitive emissions are detailed in the Environmental Risk Assessment (K529.1~09~003) Section ERA8.

Further controls are detailed within the Odour Management Plan (K529.1~09~007).

10.2 Dust Control

Overall risk: Medium

Residual risk (after application of management measures): Low

The control measures to manage dust and fugitive emissions are detailed in the Environmental Risk Assessment (K529.1~09~003) Section ERA8.

All vehicles delivering and collecting materials are to be covered and limited to site speed limits. There will be daily maintenance inspections of storage areas and buildings, with vehicles, plants and machinery being operated and maintained in accordance with manufacturers specifications or annually, whichever is more frequent. All these events will be recorded in the site diary.

All access manoeuvring routes are maintained in good condition and are kept clean and free and of debris. Vehicles are checked upon entering and leaving site and are washed down if necessary.

Dust suppression systems including misting systems are implemented in the MRF, and all treatment of waste is completed inside of the building.

Further risk controls relating to fugitive dust emissions are detailed within the Dust Management Plan (K529.1~09~006).

10.3 Litter Control

Overall risk: Medium

Residual risk (after application of management measures): Low

The control measures to manage litter are detailed in the Environmental Risk Assessment (K529.1~09~003) Section ERA9.

All waste storage and treatment will be conducted within the main treatment building and in accordance with good housekeeping practices, with staff required to litter pick on a 'see it, pick it up' basis.

Waste stored externally and recyclate materials are too bulky to be windblown and are stored in an enclosed receptacle/container where possible within the appropriate storage area.

Where litter is identified as a nuisance on the site boundary, the TCM and management will immediately organise the collection of litter by staff. Priority will be given to eliminating the source, following which off-site areas and the site boundary will be cleared. The source of the litter will be investigated and removed to a container ready for disposal.

10.4 Pests, Vermin, Birds

Overall risk: Medium

Residual risk (after application of management measures): Low

The control measures to manage pests, vermin and birds are detailed in the Environmental Risk Assessment (K529.1~09~003) Section ERA10. See also the Pest Management Plan (K529.1~09~010).

The majority of waste accepted for processing at the facility are not of the nature that could typically attract pests. However, measures shall be implemented to ensure the highest standards of operational practices are undertaken to mitigate any potential that exists in relation to more susceptible waste types.

Food waste and compostable packaging have the potential to attract pests but are stored in sealed containers and subject to strict turnaround times.

Daily site inspections and good housekeeping procedures will be maintained in order to reduce any occurrence and allow appropriate measures to be taken where necessary.

If an increase in a pest population is observed, the source will be investigated in order to undertake the most effective mitigation measures. All incidents (temporary or permanent) are recorded in the Site Diary.

10.5 Mud & Debris

Overall risk: Low

Residual risk (after application of management measures): Very Low

The control measures to manage mud and debris fugitive emissions are detailed in the Environment Risk Assessment (K529.1~09~003) Section ERA11.

Vehicles will be visually inspected before leaving the site and advised if there is a need to clear or remove mud or debris. The site itself will also be cleaned as necessary by site personnel to prevent off site mud or debris deposits. Regular housekeeping of all areas will be undertaken on a weekly basis to maintain cleanliness.

10.6 Water

Overall risk: Medium

Residual risk (after application of management measures): Low

The control measure to manage the risk of contaminated water run-off are detailed in the ERA (K529.1~09~003) Section ERA12.

The likelihood of significant contaminated run-off is negligible whilst the processing of accepted wastes will be undertaken on an impermeable surface, subject to a sealed drainage system.

To prevent water spray contaminated with food particles from entering external water sources, a bespoke bin wash machine has been installed in a purpose-built part of the building which is separate from all other activities in the warehouse. Discharge to foul sewer from this process is regulated by a trade effluent consent.

A forklift truck is assigned to work solely within the food waste/bin wash area to avoid the transportation of associated dirty water across the warehouse and site.

Wastes stored externally and/or are containerised, and the majority of waste storage and treatment activities take place within the building, the potential for interaction with water — and therefore the generation of contaminated liquids — is very limited.

10.7 Noise & Vibration (to be revised on findings of the Noise Screening from EA)

Overall risk: Low

Residual risk (after application of management measures): Very Low

The Environment Risk Assessment (K529.1~09~002), section ERA14, identifies the risk and control measures for noise and vibration.

The site is located within a small but established commercial area, surrounded by other commercial businesses, as shown in the Site Setting Plan (K529.1~20~003), and operations are only carried out within permitted hours, thus there will not likely be a higher noise level generated in relation to the surrounding area.

This has been confirmed by a Noise Screening Report from the Environment Agency which will be included alongside the variation submission (EPR/EB3135AD/P002).

All vehicles, plants and machinery will be inspected and maintained regularly in line with maintenance schedule set out by the manufacturer's specifications.

10.8 Fire

Overall risk: Medium

Residual risk (after application of management measures): Low

The Environmental Risk Assessment (K529.1~09~003), section ERA13 identifies the risk and control measures for fire in relation to activities on site. All parts of the facility are covered by a sprinkler system and dedicated fire alarm system. Stockpiles are limited as far as practicable and turnaround times of waste are short.

Site is operated in accordance with a Fire Risk Assessment and Fire Prevention Plan (K529.1~09~002), and all incoming waste is source segregated, and storage areas are organised with appropriate breaks to limit risk even further.

Operational areas are regularly cleaned to prevent the build-up of dust.

11 EMISSIONS AND MONITORING

The undertaking of general environmental monitoring will be performed to a defined written procedure in accordance with the appropriate EA guidance document to ensure consistency of monitoring and sampling for laboratory testing.

Monitoring of emissions, and subsequent analysis, if applicable, from the facility shall be undertaken in accordance with the necessary accreditation considerations. Where deemed as required, certified instruments and equipment will be employed for monitoring at the site.

Records of monitoring data shall be kept securely within the site office and maintained until such time as Environmental Permit surrender. Records will be forwarded to the EA as required by the conditions of the Environmental Permit and shall be made available upon request.

11.1 Point Source Emissions to Air

The operations of the site do not involve any point source emissions to air.

All plant items will be subject to regular maintenance schedules to ensure that the items operate in accordance with manufacturer's instructions, and that subsequent exhaust emissions to air are minimised and in any event within published limits.

11.2 Fugitive Emissions to Air

It is anticipated that fugitive emissions resulting from the transfer and treatment of wastes will occur, although these are likely to be limited owing to treatment operations being contained within a building. Further control measures are described in the Environmental Risk Assessment and Dust Management Plan (K529.1~09~003; 006).

It is proposed to conduct site monitoring for the following parameters by:

- Dusts - Visual inspections of the site (external manoeuvring and internal processing areas) and boundary will be undertaken on a daily basis to ensure that significant dust emissions are not emitted from the on-site activities. The resultant actions will be recorded in the Site Diary.
- Litter - Visual inspections of the site and boundary on a daily basis to ensure that significant litter emissions are not emitted from the on-site activities. The resultant actions will be recorded in the Site Diary.

11.3 Emissions to Water

The site will have no point source emissions to surface water. As a result, no monitoring is deemed necessary since there are no point sources emissions to water from the operational

area of the facility. All waste treatment operations will be undertaken within a building which will control the potential for the generation of contaminative run off. Risk controls are outlined in the Environmental Risk Assessment (K529.1~09~003).

11.4 Emissions to Sewers

Emissions to foul sewer will include wash down water from the internal cleansing area of the building used for container, vehicle and storage area wash down water. Foul water from the offices and welfare facilities will also discharge to foul sewer.

Monitoring of emissions will be undertaken via a Trade Effluent Discharge Consent (TEDC).

12 CLIMATE CHANGE

Climate change may increase the risk of uncontrolled emissions or smoke and fire water; increase in waste reactions or fires involving heat sensitive or combustible waste; and increase in high temperature expansion and stress of plant, pipework and fittings. There is also a risk if UV degradation of plastic pipes and hoses causing them to fail; increased dust emissions from processing areas (risk of reduced water availability for dust suppression); and potential increased risk of wildfires impacting the site.

Potential effects from climate change have been identified within Table ERA15 of the Environmental Risk Assessment (ERA) (K529.1~09~003), where management procedures and controls are identified to reduce identified risk.

The effects of climate change and management will be reviewed on an annual basis, along with the Management System or following an extreme climate event.

12.1 Temperature

Temperature fluctuations are unlikely to impact the current waste streams accepted on to site, especially given all treatment operations are undertaken within a building. If the waste streams change then this will be re-assessed. Those wastes stored externally are limited in quantity and containerised.

12.1.1 Summer

The potential for risk posed by increasing temperatures during summer months is limited. Wastes are primarily stored within the building and therefore potential heating from increased exposure to the sun is limited.

Dust could potentially represent an issue but this is controlled as treatment and the majority of storage is undertaken within a building and misting systems within the MRF limit dust. Further controls are described within the Dust Management Plan (K529.1~09~006).

The appropriate mitigations to further control the limited risk can be found in the Environmental Risk Assessment (K529.1~09~003).

12.1.2 Winter

The potential for odour complaints and pest infestations in warmer winter temperatures have been considered and appropriate mitigation can be found in the Environmental Risk Assessment (K529.1~09~003).

The risk of freezing pipes in response to lower winter temperature has also been considered.

12.2 Rising Sea Levels

The site is positioned nearby to the Rainham Marshes which are home to the nearest water courses to site, eventually flowing into the River Thames. The site is located in a Low-Risk Flood Zone for both river and coastal flooding in accordance with RoFRaS and FRAW models (see Environmental Risk Assessment K529.1~09~002). The site does benefit from flood defences.

In relation to Flood Zones, the site is located in a Flood Zone 3

12.3 Changes in Rainfall Patterns and Intensity

The potential for increase site surface water and flooding has been considered and mitigated for in the Environmental Risk Assessment (K529.1~09~003).

12.4 Heat Waves

Long periods of hot and dry weather have been considered, with cooling systems, emergency water usage and consideration of wastes accepted on site reviewed within the Environmental Risk Assessment (K529.1~09~003).

12.5 Storms

The potential for high winds causing damage to buildings, infrastructure and plants will be mitigated by regularly surveying of the sites infrastructure quality and keeping up to date with all EA and Government weather reports (Environmental Risk Assessment (K529.1~09~003)).

13 TRAINING & COMPETENCE

The site shall be overseen and managed by a Technically Competent Manager (TCM) holding the relevant Operator Competence Certificate qualification. The Site Manager/TCM will be responsible for the day-to-day operations at the site, and to ensure that site personnel operate the site in compliance with the Environmental Permit. They will be responsible for ensuring adequate training of staff has been undertaken.

The TCM will report any problem, or potential problem, to Senior Management as well as the Environment Agency.

The TCM will attend site in accordance with the attendance criteria specified within the Environment Agency guidance, '*Legal operator and competence requirements: environmental permits*⁴.

All new site staff are taken through an induction process, covering all areas of site operations, including company policies, operational and emergency procedures, risk assessments, site rules, and all relevant conditions of the Environmental Permit.

It is the responsibility of Senior Management and the TCM to ensure that no unauthorised persons operate plant and equipment on site.

Operation of the equipment is carried out exclusively by operators fully trained in safe working practices and safety features of the equipment.

Individual operators have access to operation and maintenance manuals of the equipment they use.

Staff training is reviewed regularly through refresher courses, to ensure continued competence in their daily tasks.

⁴ [Legal operator and competence requirements: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/legal-operator-and-competence-requirements-environmental-permits), updated 30 April 2025

14 COMPLAINTS

All complaints received concerning the permitted site will be dealt with in accordance with the existing complaints procedure in the Management System.

The Technically Competent Manager (TCM) is responsible for responding to complaints and implementing the complaints procedure. All complaints will be investigated within 24 hours upon receipt.

Upon receipt of a complaint, either directly from a neighbouring resident or indirectly via the Regulator. The following information will be requested from the complainant:

- Name;
- Address;
- Contact details;
- Date(s) and time(s) to which the complaint relates; and
- Nature of the complaint and any other details which may assist in the identification of the source, activity or circumstances which prompted the complaint.

In the event of a complaint related to odour, the timings and description of the complaint will be analysed in conjunction with the activities and meteorological conditions logged on site without delay to identify the odour source. The complainant may be asked to keep ongoing log for correlation with the site operational log. Once the source or activity is identified suitable mitigation measures will be implemented without delay to prevent odour emissions.

The details of the complaint and any subsequent investigation will be recorded in Recorra's Complaint Form, or other format recording relevant information.

14.1 Complaints Reporting

Records relating to management review, complaints, internal audits and inspections are held for a minimum of six years.

All complaints will be acknowledged and investigated by the TCM, or nominated person, with resultant actions reported to the complainant and the EA.

14.2 Community Engagement

On receipt of a complaint, the TCM, or nominated person, will investigate the complaint to swiftly rectify the source.

Where contact details are made available, the complainant will be contacted within 24 hours to check that the mitigation measures rectify the issue.

Where additional time is required to undertake repair or replacement of infrastructure which has caused the complaint, the complainant will be contacted with details on the actions being taken and the estimated timescale for completion.

15 DOCUMENTS & RECORDS

As a minimum, the following records must be kept ensuring compliance with the requirements of the Environmental Permit:

- A copy of the site permit;
- Site management plans;
- Operational procedures;
- Site and activity risk assessments;
- Competence and training records;
- Compliance records; and
- Duty of Care documentation and Environment Agency (EA) waste returns.

Records must be retained for 6 years; unless they relate to off-site environmental or health effects, or the condition of the land or groundwater when they shall be retained until permit surrender.

Copies of all relevant Environmental Permits, access to the Management System, and any other codes of practice will be available at the site office, with electronic back-ups.

Records of all waste received at, and removed from, the site will be maintained on site and reported to the EA on a quarterly basis.

Records will be kept in accordance with The Waste (England and Wales) Regulations 2011 (as amended) and the conditions of the Environmental Permit.

16 REVIEW THE MANAGEMENT SYSTEM

The Management System Summary will be reviewed in its entirety at least annually or following any substantial change in site operations.

Other activities which may prompt review of the Management System are variations to the environmental permit, accident, complaint, breach or a change in the site setting or sensitive receptors.

Where the review results in required changes, this will be documented and maintained with the site records, for example, changes to environmental management measures, new or altered equipment.

17 SITE CLOSURE

Design of the facility and operational procedures are intended to prevent any deterioration of the site during the operational period. Records of any incidents or spillages will be examined upon closure to identify and focus any requirements for site investigation. A final site report will be prepared and submitted in conjunction with an application to surrender the Environmental Permit for the facility.

The facility design will aid the decommissioning process. Containment bunds within the building, and waste storage and processing areas are constructed with or are sited upon concrete of appropriate specification to prevent deterioration. All pipework and vessels will be flushed out upon decommissioning with the flushing's gathered and disposed of at a suitably permitted facility.

All remaining raw and waste materials at the site will be removed and disposed of or recovered or re-used where appropriate, regarding prevailing practices at the time of decommissioning.

Items of plant within the buildings will be removed and reused, reconditioned or recycled as appropriate.



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