Variation Report

Perry Road Recycling Facility, Perry Road, Dagenham, RM9 6QD

Variation Application EPR/DB3502TZ

Prepared by

integrated skills.

For

Recycled Material Supplies Limited

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[RMS-DAG-VAR-01]

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1. INTRODUCTION

1.1 Recycled Material Supplies Limited operate a Physical Treatment facility in Perry Road, Dagenham, RM8 6QD.

1.2 The Environmental Permit EPR/DB3502TZ was originally issued on 31 March 2016 to operate an aggregate recycling facility. This permitted the treatment of up to 250,000 tonnes per annum of general construction, demolition and excavation waste.

1.3 In January 2019, the permit was varied to include a new aggregate washing activity, extend the site boundary, permit the external storage of waste and update the drainage plan which was a pre-operational condition.

1.4 In June 2021, the permit was varied to include the following waste codes:

- 010102 waste from mineral non-metalliferous excavation
- 101208 waste ceramics, bricks, tiles and construction products
- 150107 Glass packaging
- 170202 Glass
- 170904 mixed construction and demolition waste (restricted to mixed soils, concrete and bricks only)
- 191205 Glass
- 191302 solid wastes from soil remediation other than those containing dangerous substances.
- 200102 Glass

Proposed Changes

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

1.6 The following activities are required:

- Section 5.3 Part A (1) (a) Disposal or recovery of hazardous waste with a capacity exceeding 10tpd involving: ii) Physico-Chemical Treatment
- Section 5.6 Part A(1) (a) Temporary storage of hazardous waste within a total capacity exceeding 50 tonnes

1.7 Table 1 provides the proposed waste list:

Table 1 – List of Wastes to be Added to the Permit

17 CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)	
17 01	concrete, bricks, tiles and ceramics
17 01 06*	mixtures of, or separate fractions of concrete, bricks, tiles and ceramics containing hazardous substances
17 05	soil (including excavated soil from contaminated sites) stones and dredging spoil
17 05 03*	Soil and stones containing hazardous substances
17 05 05*	dredging spoil containing hazardous substances
17 06	Insulation materials and asbestos containing construction materials
17 06 05*	Soil based Construction materials containing asbestos
17 09	other construction and demolition wastes
17 09 03*	Soil containing hazardous substances with inclusions only
19 WASTES FROM WASTE MANAGEMENT FACILITIES, OFF SITE WASTE WATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION / INDUSTRIAL WASTE	
19 02	wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation)
19 02 04*	treated soils containing hazardous substances only
19 12	wastes from the mechanical treatment of wastes
19 12 11*	treated soils containing hazardous substances only
19 13	wastes from soil and groundwater remediation
19 13 01*	solid wastes from soil remediation containing hazardous substances

1.8 Waste codes 190204* and 191211* were added to support critical infrastructure tunnelling projects in London.

1.9 It is also proposed to increase the annual waste throughput to 350,000, with no more than 100,000 tonnes of waste being hazardous.

1.10 It is proposed to treat 1,000 tonnes of hazardous waste a day. The maximum storage capacity for hazardous waste will be 2,500 tonnes. This would enable the site to store waste generated from a large project.

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

[1] Guidance for the Recovery and Disposal of Hazardous and Non Hazardous Waste, Sector Guidance IPPC S5.06 Environment Agency 2004.

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

2. MANAGEMENT AND OPERATIONS

Management System

2.1 The company currently does not have a certified Environmental Management System. However, the company has developed its own Management System. The EMS will be updated fully once the permit variation has taken effect. This section provides the EMS summary.

2.2 An Environmental Policy is provided in Appendix B.

Site Infrastructure Plan

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

2.4 The site infrastructure includes:

- 6m high concrete perimeter walls
- Large building
- Internal storage bays
- External storage bays
- Fixed Wash Plant with storage bays
- Fixed dust suppression system
- 2 No. Weighbridges
- 2 Storey Office
- Fixed wheel wash

Site Operations

2.5 The site is an existing operational site for treating construction and demolition waste. The site receives non-hazardous waste from construction projects. Activities include crushing and screening of mixed construction waste to produce aggregates and soil.

2.6 There is a washing plant on site which is used to produce the following recycled aggregates which are re-used in the construction industry:

- Silty Clay
- 0-2mm Coarse to very coarse sand
- 2-4mm Very fine gravel
- 4-10mm Fine gravel

- 10-20mm Medium gravel
- 20-40mm Coarse gravel
- DOT Type 1 Unbound Mixture
- DOT Class 6F5 Selected Granular Material

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

2.8 The purpose of the activity is to treat the hazardous waste to achieve non-hazardous status. There are two activities proposed:

- Asbestos removal (visible and with low fibre count)
- Screening and separation (stone removal from soil)

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

Waste Acceptance

2.10 The non-hazardous waste will continue to be accepted as per the current arrangement. The building will be subdivided to receive non-hazardous and hazardous waste.

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

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

- Pre-Acceptance
    - Waste classification
    - Characterisation (nature of process producing waste)
    - Sampling and Analysis
        - Composition
        - Handling requirements
        - Hazard properties
        - EWC code
    - Define treatment and disposal route
    - Creation of unique tracking reference
- On site Acceptance
    - Booked Arrival Time

- Chemist on site to oversee delivery
- Capacity checks on site
- Vehicle waiting, load inspection, checking/sampling
- Traffic control
- Checking paper
- Compliance checking/testing
- Failure of sample meeting compliance checks – quarantine procedure
- Waste Transfer/Consignment Note
- Update Waste Tracking Record

- Waste Rejection Procedures

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

Quarantine, Storage and Rejection of Wastes

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

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

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

Waste Tracking

2.17 The waste will be tracked throughout the process from pre-acceptance, acceptance, on site storage and treatment, and in the case of aggregate production, the certification and dispatch notes.

2.18 Overall, the tracking system will include the following:

- Unique Reference Number
- Site Producer Details
  - Source, nature, composition and hazard properties
- On site Checks
  - Date of Arrival
  - Chemical Analysis
  - Rejection
- Bay Number
- Volume Received and treated
- Destination of products

- Name of staff involved in acceptance or rejection procedures
- Name of staff involved in confirming recovery/disposal options

Waste Treatment and Storage

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

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

2.21 The building will provide containment to prevent and minimise fugitive emissions to air, particularly dust. An updated Dust and Emissions Management Plan has been prepared for the site.

2.22 The operation provides sealed drainage, there will be no point source emissions to water.

2.23 The site is concreted. The hazardous waste will be received, stored and treated inside the building.

2.24 Non-hazardous waste will be treated inside the building (crushing and screening). Stockpiles will continue to be stored outside as per the current EMS. The washing plant will continue to operate as per the current EMS.

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

Site and Equipment Maintenance Plan

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

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

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

2.29 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.

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

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

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

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

- Construction work
- Start and finish of daily waste management activities on site (operational hours)
- Maintenance
- Breakdowns
- Emergencies
- Problems with waste delivered and action taken
- Site inspections and consequent actions carried out by the operator
- Technically competent management attendance on site; the date and the time onto site and the time left site
- Despatch records
- Weather conditions
- Complaints about site operations and actions taken
- Environmental problems and remedial actions

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

Contingency Planning

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

Accident Prevention and Management Plan

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

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

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

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

- Likelihood of the accident/event occurring

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

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

Noticeboard

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

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

A Changing Climate

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

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

2.43 A rain water collection system will be used to store rain water from the building. This will allow surface water management and containment of activities to protect against dry conditions which can generate dust.

2.44 The washing plant recycles water in the process.

2.45 Operating inside the building will minimise dust emissions and help to protect against wind action.

2.46 The site is in a location that benefits from flood defences.

Complaints

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

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

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

Technical Competence and Staff Training

2.49 The operations will be overseen by two Technically Competent Managers (TCM) to ensure that cover is provided at the site. Each TCM will be responsible for ensuring the requirements of continued competency is met. Certificates will be kept in the site office. One TCM will be site based. The other TCM is based at another RMS site. The TCMs provide cover for each other during holidays. There is a third TCM available if required for contingency cover.

2.50 There will also be a chemist based at the site to carry out the supervisory role required for hazardous waste. This role will meet the minimum requirements of having a degree in Chemistry or HNC qualified chemist. A laboratory will be established in the site office (top floor).

2.51 The TCMs will both have the modules for Hazardous Waste Transfer and Treatment.

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

2.53 Other site personnel will include administrative staff and site operatives.

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

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

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

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

Table 1 – Training Matrix

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

Note – Chemist will hold a degree in chemistry or HNC qualified chemist.

Records

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

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

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

Review Management System

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

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

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

Site Closure

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

2.63 The operation is quite straightforward as it uses mobile plant and equipment and would not require detailed plant decommissioning. Depending on the proposed after-use of the site will determine whether the building needs to be dismantled.

3. PROPOSED CHANGES

Waste Types and Quantities

3.1 The current permitted annual throughput is 250,000 tonnes for non-hazardous waste.

3.2 It is proposed to amend the total annual throughput to 350,000 tonnes, to allow for the hazardous waste input.

3.3 It is proposed to handle up to 100,000 tonnes of hazardous waste. Any shortfall in hazardous waste throughput, could be met by non-hazardous waste. Overall, the site will not accept more than 350,000 tonnes for waste.

Summary of Activities

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

Activity Reference A1

Section 5.3 Part A (1) (a) Disposal or recovery of hazardous waste with a capacity exceeding 10tpd involving:

ii) Physico-Chemical Treatment

3.5 The specified activities will be:

- R3 – Recycling/reclamation of organic substances which are not used as solvents.
- R5 – Recycling/reclamation of other inorganic materials
- D9 - Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D12

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

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

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

Activity Reference A2

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

3.9 The specified activities will be:

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

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

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

3.11 No more than 100,000 tonnes of hazardous waste will be treated in any one year.

3.12 Storage of hazardous waste will not exceed 2,500 tonnes at any one time.

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

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

Activity AR 3 - Waste Operations

3.15 The waste operations will continue as per the current permit. The activities include:

- R3: Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes)
- R5: Recycling/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)
- R12: Exchange of wastes for submission to any of the operations numbered R1 to R11

3.16 The treatment operations include sorting, separation, screening, crushing, blending or washing of waste into different components for recovery. This relates to non-hazardous waste.

3.17 No more than 350,000 tonnes shall be treated in any one year.

Waste Types

3.18 Table 1 provides the list of waste to be added to the permit. The following provides further information on the nature of those wastes.

17 01 06* – mixed concrete, bricks, tiles and ceramics removed from a construction site.

17 05 03* - Hazardous waste soils will be screened.

17 05 05* – Hazardous waste soils will be screened.

17 06 05* – For soil with heavy asbestos loading, it is proposed to remove the asbestos manually. The asbestos will be double bagged and placed in a sealed

container. This code will also allow RMS to receive double bagged asbestos from construction sites and transfer this waste as a bulk load in a sealed container.

17 09 03* – This corresponds to Made Ground and contaminated materials This will be screened.

19 02 04* - This covers the tunnelling projects in which chalky soil is too wet for transit and has been pressed to reduce moisture under mobile plant permit. This waste may be stored on site.

19 12 11* - This is for material being generated by a tunnel process where tunnelled soils are being mechanically treated under mobile plant permit to reduce moisture. This waste may be stored on site.

4. TECHNIQUES FOR POLLUTION CONTROL

Pre-Acceptance Procedures

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

4.2 All waste will be collected by the operator's own fleet of vehicles.

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

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

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

4.6 The Hazardous Waste TCM or chemist will take a sample based on 1 sample per 450 tonnes (25 loads).

4.7 For soils containing asbestos, the waste will only be considered if it is demonstrated that free chrysotile fibrous asbestos in the soil is less than 0.1% w/w or mixed forms of fibrous asbestos in the soil is less than 0.01% w/w. Waste which fails to meet these criteria will not be permitted at the site.

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

4.9 Prior to waste being accepted at the site, there is a clear method for handling the material once it arrives on site. The site operations will be specific to either removal asbestos or screening hazardous soils.

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

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

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

On-Site Acceptance Procedures at the Site

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

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

4.15 All vehicle drivers will use the in-weighbridge to record the weight. The driver will then park in the holding area and report to the site office and produce the documentation. There will be a dedicated office for handling hazardous waste, which will include a laboratory.

4.16 The chemist will check that the documentation complies with the Pre Acceptance Form (Form A) and Booking Form (Form B).

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

4.18 If the Hazardous Waste TCM or chemist discover that there are inconsistencies with the documentation, it will need to be reviewed and corrected. A Non Compliance Form (NCF01) will be completed.

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

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

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

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

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

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

to select incoming loads for sampling. A minimum of 3 spot samples will be tested from the relevant hazardous properties.

4.25 The sample will be taken to the on-site laboratory and tested for the following; pH, PCBs, Flash test. The laboratory is close to the reception area. The sampling will be carried out by authorised personnel with full training.

4.26 For asbestos contaminated soil from one source, the chemist will test the first load on arrival and then 10% of the following loads will be sampled and analysed. Samples will be checked against the pre-acceptance classification as follows. For asbestos in unbound fibrous form to ensure that free chrysotile fibre asbestos in soil is less than 0.1% w/w and other forms or mixed forms of fibrous asbestos in the soil is less than 0.01% w/w.

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

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

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

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

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

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

4.32 Details on waste rejection are set out below.

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

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

4.35 All loads will be sheeted on arrival.

Waste Rejection Procedure

4.36 Waste will be rejected if the following occurs:

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

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

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

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

4.40 The Environment Agency will be notified of the rejection.

Waste Storage

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

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

4.43 There are clearly defined storage areas for different waste streams. The hazardous and non-hazardous areas will be separated using a 4m high concrete wall. The hazardous storage area will have separate drainage to a sealed tank.

4.44 Within the hazardous section of the building, there will be an area dedicated to receiving asbestos contaminated soil. If the waste cannot be treated the same day, a tarpaulin will be placed over the waste until ready for treatment. Damping down procedures will also be in place.

4.45 Hazardous waste pending treatment will be stored on a batched process within 1 of 4 bays.

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

4.47 As set out in the on-site acceptance procedures, the waste will be unloaded into a storage area or bay. Waste will be received under the supervision of the Hazardous

Waste TCM or chemist. Once approved, the site office will use radio contact to staff working in the building, notifying them that a delivery is being made.

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

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

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

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

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

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

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

Table 1 – Storage Volume Hazardous Waste

Waste Area	Dimensions	Maximum Height	Volume m^3
Asbestos Reception Area	7.5m x 9.5m	4m	300
Asbestos (x2 enclosed containers)	6.15m x 2.55m 6.15m x 2.55m	2.7m 2.7m	40 40
Soil post Asbestos Screen	6.15m x 2.55m	2.7m	50
Haz Bay 1	5m x 9m	4m	150
Haz Bay 2	5m x 9m	4m	150
Haz Bay 3	5m x 9m	4m	150
Haz Bay 4	5m x 9m	4m	150
Screened Soil	5m x 5m	4m	100
Stones*	4m x 4m	3m	50

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

4.55 The total storage volume of hazardous waste is 1,180m^3.

4.56 For waste in the storage bays, a 0.5m freeboard will be marked on the wall to delineate the extent to which waste can be stored. This will help minimise waste overspilling into the main working area or into adjoining bays.

4.57 The bay walls will also extend 10m from the rear wall. The waste will not extend further than 9m to prevent overspilling.

4.58 The volume of the waste has been calculated using the dimensions of the bay with a maximum height. The waste will not be stored in uniform blocks and an allowance has been made for the shape of the stockpile within the bay.

4.59 The bay side walls will be 4m high. The rear wall will be 6m high. The central part of the waste pile can be higher than 4m. Waste stored against the side walls will be at 3.5m high. Waste can be stored at 5.5m along the rear wall.

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

4.61 The asbestos removed from the picking station will be placed into sealed containers. The Hazardous Waste TCM will check the storage capacity daily. When a container is 75% full, arrangements will be made to transfer the contents to an authorised facility. The transfer will be made on an exchange basis, thereby replacing the full container with an empty container on collection. This will maintain the storage capacity.

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

4.63 Bays will be washed down prior to receiving waste from a different source.

4.64 No hazardous or non-hazardous waste will be kept on site for longer than 6 months from receipt.

Table 2 – Storage Volume Non Hazardous Waste

Waste Area	Dimensions	Height	Volume m^3
Non Hazardous Waste Reception Area	15m x 15m	4m	600
Aggregate Bay	5m x 5m	4m	75
Aggregate Bay	5m x 5m	4m	75
Aggregate Bay	5m x 5m	4m	75
Stockpile	3.5m x 3.5m	4m	30
Stockpile	3.5m x 3.5m	4m	35

4.65 The total storage volume of non-hazardous waste is 880m^3. However, some of the material produced will be stored in bays outside of the building. These materials will be tested for meeting aggregate production requirement and will be certified accordingly.

4.66 Some material from this process will be transferred to the wash plant.

Compatibility Testing

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

Treatment

4.68 There will be two treatment operations for hazardous waste.

Asbestos Removal

4.69 This will be used specifically for samples that have been reported with visible with low fibre content.

4.70 The waste will be approved as per the pre and on-site acceptance checks. There will be a dedicated storage bay for this waste. The waste will be loaded into a feed hopper using dedicated loading shovel. This will have a colour coded bucket to ensure that it is only used for handling asbestos contaminated waste.

4.71 The waste will be loaded into a feed hopper with an enclosed conveyor belt. The waste will be loaded thinly spread across the conveyor belt, which will be on a slow speed setting.

4.72 There will be 4 picking stations inside the cabin. Operatives will place picked asbestos fragments into polythene bags located next to them. When full, or at the end of each working day, the bags will be sealed and placed into a second bag. This will achieve the double bagging requirement for asbestos. The double bags will be sealed and placed into the asbestos containers located beneath the picking station. The containers will be locked unless being used for loading.

4.73 The container will be lined will plastic liners to prevent it becoming contaminated. Although the same containers will be used for this this process. The entire container will be removed and transferred to an appropriate landfill that is able to receive stable non-reactive hazardous waste.

4.74 The soil will continue along the conveyor belt into a storage container. These soils will be subject to additional testing for classification purposes. The waste outputs will be:

- 17 05 04 soil and stones other than those mentioned in 17 05 03*
- 17 06 05* Asbestos removed from the soil (transported to landfill)
- 17 05 03* soil and stones containing hazardous substances

4.75 The purpose of this treatment is to remove the hazardous content from the soil. EWC 170503* will be used for any soils that fail the on-site classification.

4.76 All staff working with asbestos must comply with the Control of Asbestos Regulations 2012.

4.77 Plant and lorries used to transfer asbestos contaminated wastes must be washed down with a low pressure hose. There will be a designated area for this with sealed drainage. The driver will remain in the cab.

4.78 Staff leaving the asbestos working will wash their boots in a boot wash in a designated PPE transition zone.

4.79 Staff will be issued with appropriate PPE specifically for this role. Any used PPE will be double bagged and placed in the asbestos container.

4.80 To ensure that asbestos fibre emissions are not released from the stockpiling and movement of soils, air testing for asbestos fibres will be undertaken twice weekly at static monitoring locations around the building. Monitoring will be in line with M17 Guidance with asbestos fibre sampling at a flow rate of two litres per minute over a four hour period to achieve a 480 litre sample volume.

4.81 Subsequent analysis will be fibre counting by PCM in accordance with HSG 248. Scanning electron microscopy and analytical transmission microscopy would also be undertaken to identify the precise composition/type of any fibres detected. All the samples collected will be analysed on site by an asbestos specialist and the reported results will be UKAS accredited.

4.82 Any washdown water will be captured in the hazardous waste drainage system. When the sealed tank needs to be emptied, it will be pumped into a tanker via a 1 micron bag filter which will be used to remove asbestos fibres. The filter bag will be double bagged and placed in to the asbestos container for off-site removal.

Hazardous Waste Soil Screening and Separation

4.83 The treatment process consists of screening the waste to separate the stone content from the soil. This will create two stockpiles:

- Stones
- Soil

4.84 The process is simply a separation operation. Once confirmed as acceptable, the waste will be transferred using the loading shovel into the feed hopper of the screening plant. The screening plant will transfer the soil into a bay. The stones will be conveyed into a second storage area. The stones are likely to be non-hazardous waste. These will be tested for classification purposes and if non-hazardous, they will be transferred to the non-hazardous processing area. If the stones are hazardous, they will be transferred to a holding bay pending off-site removal.

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

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

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

4.88 Once processed, arrangements will be made to transfer the separated materials to their onward, pre-arranged destination. For the waste soils, depending on the hazardous composition, these will be transferred to a soil washing facility for further treatment or landfill. The chemist will carry out testing to classify the waste to confirm the next stage. A representative sample will be taken from the stockpile and analysed in the laboratory.

Procedure for Classifying Stone Content

4.89 The operation of this site will be a batched process. Therefore, the hazardous waste arriving at the site will be stockpiled in a bay and batched for processing through the screening plant. The screening process will remove the stone content from the soil.

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

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

4.92 The classification process will be used to determine whether or not the stone content is hazardous. If the removal of the soil content has resulted in the stones being

deemed non-hazardous, the stockpile will be transferred to the existing non-hazardous waste operation for further processing. This will be recorded.

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

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

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

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

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

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

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

4.100 All plant and equipment will be subject to daily checks. These are pre-operational checks carried out be trained staff at the start of each day. If there are any defects, the staff must notify the TCM. RMS has contracted maintenance staff to repair defects. If the defect cannot be repaired within 48 hours, replacement machines will be deployed. This relates to the loading shovel and excavator only.

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

4.102 This is a physical treatment operation.

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

Plant and Machinery

4.104 The following plant will be used at the site.

Description	Make	Model	Comment
Excavator x2	TBC	TBC	Mobile
Loading shovel x2	TBC	TBC	Mobile
Soil Screener	TBC	TBC	Fixed
Crusher	TBC	TBC	Fixed

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

4.106 All plant and equipment will be subject to daily checks. These are pre-operational checks carried out be trained staff at the start of each day. If there are any defects, the staff must notify the TCM. RMS has contracted maintenance staff to repair defects. If the defect cannot be repaired within 48 hours, replacement machines will be deployed. This relates to the loading shovel and excavator only.

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

4.108 RMS has access to other plant or can hire at short notice.

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

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

4.111 RMS has a policy of purchasing new machinery.

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

5. EMISIONS CONTROL

Point Source Emissions to Air

5.1 There are no point source emissions to air.

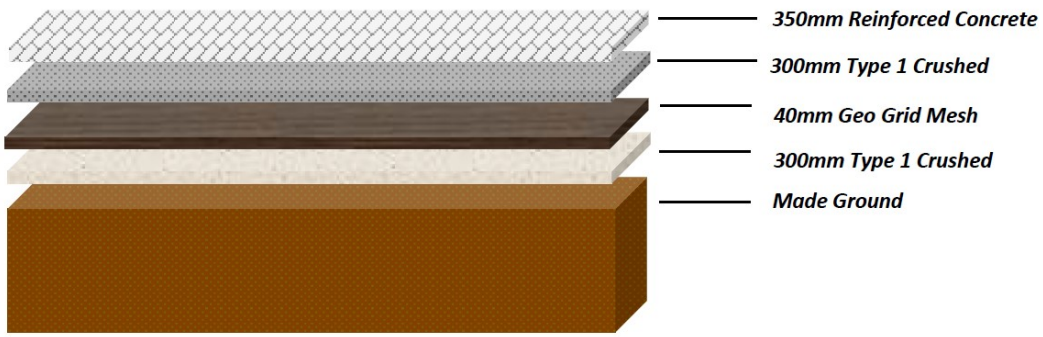
5.2 The treatment process does not produce gases.

Point Source Emissions to Surface Water and Sewer

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

5.4 The concrete construction profile is shown on Figure 1.

Figure 1 – Construction Profile for the Concrete Surface across the Site



5.5 The drainage scheme for the main yard involves drainage falls into an interceptor and then into a large attenuation tank. There is a Consent to discharge at a rate of 1.7l/second (Consent reference OPS/WWQ/TRIVO01).

5.6 A separate sealed tank will be installed to provide a self-contained drainage area for the hazardous waste. The tank will hold 10,000 litres. A separate tank has been installed for the non-hazardous waste operation.

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

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

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

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

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

5.12 There is also a foul sewer connection for the offices.

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

Point Source Emissions to Groundwater

5.14 There will be no point source emissions to groundwater.

5.15 The entire site is concreted with drainage.

Fugitive Emissions to Air

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

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

- EMS9_1_v3.1 Dust Management Plan
- EMS9_5_v1 PM 10 Procedure
- EMS9_v1 Visual Dust Procedure

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

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

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

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

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

Odour

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

5.23 The nature of the waste being accepted is unlikely to generate odour. The proposed operations intend to manage asbestos contaminated soil and heavy metal contaminated soil. Soils containing a high hydrocarbon content will be accepted.

Noise and vibration

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

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

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

6. RAW MATERIALS

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

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

Waste Minimisation Audit

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

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

Water Use

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

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

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

6.8 There is also an attenuation tank installed for managing surface water. This water can also be pumped to provide additional supplies for dust suppression.

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

Waste Recovery or Disposal

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

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

6.12 For asbestos containing soils, this will involve removing visible asbestos from the soil.

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

Energy

6.14 The energy requirements are quite low for the facility.

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

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

6.16 The site is not operational and therefore the energy use is not known. An Energy Efficiency Plan will be prepared following 12 months operation, after which time the energy use will be known.

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

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

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

Accidents

6.20 An Accident Management Plan is provided in Appendix A.

7. MONITORING

Dust Monitoring

7.1 PM10 and visual dust monitoring will continue in accordance with the EMS. The DEMP has been updated.

8. CLOSURE

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

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

8.3 The operation is quite straightforward as it uses mobile plant and equipment and would not require detailed plant decommissioning. Depending on the proposed after-use of the site will determine whether the building needs to be dismantled.

9. IMPACT ASSESSMENT

9.1 A Risk Assessment is provided as a separate report.

Appendix A
Accident Management Plan

Accident Management Plan

Prepared 29 March 2023

Next Review May 2023

Event	Likelihood of Occurrence	Consequence of Occurrence	Actions Taken or Proposed to Minimise the Likelihood or Consequences of Occurrence	Actions Planned if the Event Does Occur
Flooding based on Environment Agency indicative floodplain maps	Very Low Probability (each year this area has a chance of flooding of less than 0.1%) The site benefits from flood defences	N/A	N/A	N/A
Minor fires associated with machinery	Unlikely and infrequent based site procedures	Damage or injury from minor fires would be minimal with long term effect unlikely	Fire fighting equipment to be stored on site and implement fire action plan Regular maintenance of plant and machinery. Site is manned 24/7	Implement fire action plan
Fires associated with storage of waste oil	Unlikely and infrequent based site procedures	Damage or injury could be significant based on nature of material.	Fuel stored in accordance with oil storage regulations. Site is manned 24/7.	Implement fire action plan
Fires caused by arson and/or vandalism	Unlikely and infrequent	Damage or injury from minor fires would be minimal with long term effect unlikely	Site is manned 24/7. Low risk as the site does not manage combustible wastes.	Implement fire action plan,
Minor spillage caused by machinery and fuel/oil leaks from vehicles	Unlikely and infrequent	Low risk to surface water and groundwater. Localised spillage would be minimal with long term effect unlikely	Spill kits maintained in site office. Vehicle manoeuvring will be controlled. Regular maintenance of plant and machinery.	Implement spillage action plan
Major spillage caused by machinery and fuel/oil leaks from vehicles	Unlikely and infrequent	Low risk to surface water and groundwater. Localised spillage would be minimal with long term effect unlikely	Spill kits maintained in site office. Vehicle manoeuvring will be controlled. Regular maintenance of plant and machinery.	Implement spillage action plan

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

Appendix B – Environmental Policy

ENVIRONMENTAL POLICY

Recycled Material Supplies Limited ('the Company') is conscious of the potential impact on the environment of its activities and strives to manage and minimise those impacts. To that end, this Environmental Policy has been adopted and is obligatory for all employees and those working for or on behalf of the Company.

We will carry out our activities with consideration for the environment. As part of this we will aim to minimise the potential environmental impact of our operations and strive to improve our recycling and recovery rates.

In order to meet the above requirements, the Company will:

- hold all employees and contractors accountable for environmental performance of their areas of responsibility
- comply with all applicable environmental legislation and operate in accordance with other relevant environmental requirements that are placed upon us
- maintain sufficient documentation to demonstrate compliance with relevant environmental requirements
- support process modifications and products that reduce environmental impacts and encourage waste recycling and recovery
- work with our contractors and suppliers to promote positive environmental actions in accordance with our stated objectives
- assess, in advance where possible, the potential or actual environmental impacts resulting from our business operations and the environmental effects of any significant development and adjust the Company plans accordingly
- ensure that all incidents and non-compliance situations are reported, recorded and evaluated where environmental harm occurs, or could have occurred, and ensure that corrective and preventative actions are implemented
- maintain an open communication environment. Managers are encouraged to address employees' questions and concerns promptly and thoroughly
- to communicate and provide the necessary information, instructions, supervision and training to enable all persons affected by the Company's undertakings to carry out their environmental duties

This policy will be made available to our employees and to those working for and on behalf of the Company and will be provided on request to any other interested parties. This policy will be reviewed periodically in accordance with Company procedure. We also recognise that we have a responsibility to encourage our suppliers and customers to assist us in achieving our environmental objectives.

We look forward to your support in implementing this policy.

Dominic Parkinson
(Company Director)

March 2022