



Ringway Infrastructure Services Ltd.

Environmental Management System

A Bespoke Environmental Permit Application for a Waste Transfer Station for the Receipt, Storage and Dispatch of Non-Hazardous Highway Excavation Wastes, Road Gully Arisings and Street Sweepings, at Melksham Depot, 24 Hercules Way, Bowerhill, Melksham, Wiltshire, SN12 6TS.

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Crestwood Environmental Ltd.
1 & 2 Nightingale Place
Pendeford Business Park
Wolverhampton
West Midlands
WV9 5HF

Tel: 01902 229563

Email: info@crestwoodenvironmental.co.uk
Web: www.crestwoodenvironmental.co.uk

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1 INTRODUCTION

- 1.1.1 This Environmental Management System (EMS) defines the waste types and operations to be undertaken at Melksham Depot, 24 Hercules Way, Bowerhill, Melksham, Wiltshire, SN12 6TS (***the Site***). The application is submitted on behalf of Ringway Infrastructure Services Limited (***the Operator***).
- 1.1.2 This EMS is submitted in support of an application for a Bespoke Environmental Permit to authorise a Waste Transfer Station for non-hazardous road gully wastes, street sweepings, highway excavation wastes such as tarmac and soils and incidental amounts of scrap metal and green waste. The Site will not receive hazardous wastes.
- 1.1.3 Wastes (other than scrap metal which will be stored in a sealed container) will be tipped into specially engineered bays with concrete surfaces, which fall to a sealed drainage system. Run-off from the Site is to foul sewer, via an interceptor. A Discharge Consent from the sewerage undertaker will be in force for the Site.
- 1.1.4 In terms of road gully wastes, water will naturally drain by gravity to the sealed drainage system. Grit and other residues from gully emptying will remain in-situ in the bay.
- 1.1.5 Wastes will be stored, bulked up and dispatched in dedicated bays to ensure materials are suitable managed at all times. Wastes will be removed off-Site to authorised facilities.
- 1.1.6 The Site location and Environmental Permit boundary are shown on Drawing No CE-RW-1303-DW01, see Appendix 1.

2 LIST OF PERMITTED WASTES

- 2.1.1 Permitted wastes are limited to those detailed in Table 1 below.
- 2.1.2 All waste will be accepted in accordance with ISO14001 Waste Acceptance Procedures.

Table 1 List of Permitted Wastes

Waste Code	Description
17	Construction and Demolition Wastes (Including Excavated Soil from Contaminated Sites)
17 01	Concrete, bricks, tiles and ceramics
17 01 01	Concrete
17 03	Bituminous mixtures, coal tar and tarred products
17 03 02	Bituminous mixtures other than those mentioned in 17 03 01
17 04	Metals
17 04 05	Iron and steel (scrap metal from highway works)
17 05	Soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	Soil and stones other than those mentioned in 17 05 03*
20	Municipal wastes (household waste and similar commercial, industrial and institutional fractions) including separately collected fractions

20 02	Garden and park wastes
20 02 01	Biodegradable waste (green waste only)
20 03	Other municipal wastes
20 03 03	Street cleaning residues

3 PERMITTED ACTIVITIES

3.1 PERMITTED ACTIVITIES

3.1.1 The Operator, intends to dewater gully arisings from highways through a process of settling out via gravity prior to removal to an authorised facility. The proposed waste activities are specified in Table 2 below:

Table 2 Permitted Activities

Storage / Treatment Process	Annex I/II operations
Physical treatment of gully arisings including the dewatering of gully arisings prior to disposal of solid waste at landfill.	Annex I D9 Physical / physico- chemical treatment of waste prior to any other disposal operation
Storage of treated waste for removal off-site to an authorised facility.	Annex I D15 Storage pending operation numbered D9
Storage of waste for removal off-site to an authorised facility.	Annex II R13 Storage of waste pending any of the operations numbered R1 to R13

3.2 SUBSTANCES

- 3.2.1 Oils and grease will be required for maintenance of mobile plant at the Site.
- 3.2.2 No substances that would be classified as 'dangerous' under the Control of Major Accident Hazards (COMAH) Regulations will be used at the installation for the operation of the facility.

4 SITE OPERATIONS

4.1 WASTE ACCEPTANCE

- 4.1.1 The maximum waste throughput at the Site will be 3,000 tonnes per annum and will include the storage of 5 tonnes of scrap metal and 2 tonnes of biodegradable waste. Should the scale of these two waste streams increase or treatment activities ensue, a Fire Prevention Plan will be prepared and submitted for assessment.
- 4.1.2 The main requirement for controlling all wastes received at the Depot is to ensure that they meet the conditions of the Environmental Permit. Materials will be visually inspected upon deposit and any non-conforming wastes will be rejected and either transferred to a quarantine area for secure

storage prior to removal off Site to an authorised facility or returned to the waste producer.

- 4.1.3 All waste received at the Depot will be documented in accordance with all legal requirements including but not limited to the Environmental Permitting (England and Wales) Regulations 2016 and the Waste (England and Wales) Regulations 2011. Waste Transfer Notes / Season Tickets will be checked in accordance with the Duty of Care to ensure that only permitted wastes are accepted. Following checking of the correct paperwork the vehicles will be directed to discharge their loads.
- 4.1.4 Following the checks above, a Site operative will direct authorised waste loads to the appropriate waste storage bay or scrap metal container, as appropriate. Waste delivery vehicles will reverse up to the allotted storage bay / area in preparation to unload the waste material.
- 4.1.5 The vehicle will deposit the load and a visual inspection will be made of the contents to ensure that only authorised wastes are accepted at the facility. In the unlikely event that any unauthorised or unsuitable waste is tipped it will be transferred to a secure quarantine area for subsequent removal to an authorised facility or return to the waste producer (see Section 4.2).
- 4.1.6 Dewatering of the gully waste occurs via natural gravitational means whereby any liquors settle out of the solid material over time. These liquids drain to the engineered drainage system, which incorporates an interceptor and foul sewer discharge. The remaining dewatered material is bulked up prior to export off-Site for disposal at an authorised facility.
- 4.1.7 It is anticipated that 20 – 45% of the imported gully waste material will comprise of liquors which when drained off by this method will contain no suspended solids.
- 4.1.8 All outgoing waste for disposal will have the relevant Waste Transfer Notes.

4.2 NON-CONFORMING WASTE

- 4.2.1 Should non-conforming waste be inadvertently accepted at the Site it will be stored in a secure quarantine area for off Site removal to an authorised facility or return to the waste producer.
- 4.2.2 Material rejected from the Site shall be issued with a record stating why, when and from which contract the waste was provided. This record shall be held on Site for the Environment Agency to inspect. In addition the 'Record of Non-Conformance', Appendix 2, shall be completed and the record will be held on Site.

4.3 SITE DRAINAGE

- 4.3.1 Waste storage areas consist of engineered bays and an impermeable concrete surface which drains to foul sewer via a sealed drainage system and interceptor.
- 4.3.2 The drainage system and interceptor will be visually inspected regularly to ensure they are free from any blockages and their integrity remains intact. Any maintenance required on the drainage system and interceptor will be recorded in accordance with this EMS.
- 4.3.3 The impermeable surface and containment bays will also be inspected regularly to check for any defects or damage to their integrity. Any necessary maintenance will be recorded in accordance with

this EMS.

- 4.3.4 In the event of any spillage of potentially polluting liquids such as diesel or oil, spill kits and/or absorbent material such as sand will be used to treat the incident. Used spill kits / sand will be placed in a sealed container for authorised disposal off-Site.

5 SITE RECORDS

- 5.1.1 The Site shall be managed by a Technically Competent Person in accordance with the requirements of the Environmental Permitting (England and Wales) Regulations 2016.
- 5.1.2 The Site records shall be maintained and kept secure from loss, damage and deterioration in either a Site office or secure location off-Site.
- 5.1.3 Records including Waste Transfer Notes and Registered Waste Carriers Certificates of all waste loads entering and leaving the Site shall be recorded on the 'General Waste Management' (Appendix 4) and Waste Returns will be produced in a timely manner.
- 5.1.4 A copy of the Environmental Permit shall be easily accessible by staff members or contractors. Contractors shall be briefed on the sensitivity of the Site and if not being supervised by Site personnel will require a Site induction.
- 5.1.5 Any complaints received at the Site shall be recorded on the 'Complaints Record' sheet, Appendix 5.

6 MAINTENANCE

- 6.1.1 All equipment and infrastructure on Site shall be inspected, serviced and maintained as per manufacturer guidance and 'Preventative Maintenance Checklist', refer to Appendix 6.
- 6.1.2 The Environment Agency shall be informed without delay if there is any malfunction, breakdown or failure of equipment or techniques, accident, or fugitive emission which has caused, is causing or may cause significant pollution and cause any significant adverse environmental and health effects.
- 6.1.3 Any required maintenance shall be carried out as soon as is practicable to ensure continued running of the facility and be recorded on the 'Maintenance Record', refer to Appendix 7.
- 6.1.4 Daily visual Site inspections for litter, dust and mud accumulating on Site or beyond the Site boundary shall be undertaken. More thorough weekly inspections will be carried out and recorded, 'Inspection Record', Appendix 8. The weekly inspections include a review of:
- Site road and operation pad area (i.e. impermeable concrete pavement);
 - Containment bays;
 - Drainage system, including interceptor and outfall to foul sewer;

- Dust;
- Litter;
- Mud / dirt;
- Vermin and insects;
- Fire (e.g. inspection of firefighting equipment etc.); and
- Security.

6.1.5 Any maintenance works required shall be recorded on the 'Maintenance Record', Appendix 7.

7 ENVIRONMENTAL ACCIDENT AND INCIDENTS

7.1.1 An 'H1 Accidents and Amenity Risk Assessment' has been prepared for the Site and submitted as part of the permit application.

7.1.2 In the event of an environmental accident on Site the 'Environmental Accident and Incident Record', Appendix 9, shall be completed and kept on Site.

8 TRAINING

8.1.1 The Site staff shall be trained and instructed in the procedures required to operate the Site and will be aware of the waste types authorised to be accepted at the Site as well as relevant Environmental Permit and legislation as required.

8.1.2 The Site shall be manned and supervised at all times when waste operations are in progress.

8.1.3 A record of all training shall be kept on the 'Training Record' in accordance with the 'Training Needs Checklist'; Appendix 10 and Appendix 11 respectively.

9 COMPLAINTS

9.1.1 Any complaints received at the Site, e.g. about noise, dust or odour, will be reported to the Site Manager or Technically Competent Person (with appropriate WAMITAB Certificate) who is responsible for the site management, e.g. in the absence of the Site Manager due to illness or annual leave etc.

9.1.2 The following actions will be taken on receipt of an external complaint:

- The responsible person receiving the complaint at the Site will immediately record the key details, initiating the investigation process. Details will be entered on the Complaint Report Form (see Appendix 5). The form sets out the key information that should be recorded at

this time in order to facilitate further suitable investigation.

- The Site Manager or other Technically Competent Person will be informed of the complaint as soon as possible, including the location, time and date of the complaint being lodged (where available).

9.1.3 In recognising that some causes of complaints, such as dust, noise and odour, can be transient and short-lived, timely notification of complaints directly from the complainant or the Environment Agency is imperative to allow for appropriate investigation. If the complaint occurs more than 12 hours before notification is provided to the Operator, it may not be possible to substantiate the complaint or pinpoint the cause. The Operator will, however, contact the complainant where possible, review any operations at the time which had the potential to cause the complaint and complete and record a comprehensive complaint investigation. For complaints received within 12 hours of the incident the following actions will be undertaken:

- The Site Manager or other Technically Competent Person will visit the complaint location as soon as possible, with the aim of undertaking monitoring within 2 hours if this is possible within the working day. The Site Manager or other Technically Competent Person will subjectively determine the presence or absence of the cause of the complaint, e.g. visible dust presence or source and level of noise or source and level of odour. Opportunities to meet the complainant to discuss the matter directly will be pursued, wherever possible.
- If the cause of complaint, e.g. visible dust or noise or odour, is present, the key 'FIDOR' criteria will be assessed at the complaint location, as follows:
 - Frequency – is the cause of the complaint, e.g. dust, noise or odour, intermittent or persistent; is there a history of complaints at this location?
 - Intensity – is the cause of complaint faint, moderate, strong, or very strong?
 - Duration – how long is the cause of complaint present at this location?
 - Offensiveness – provide a description of the cause of complaint; is it high, moderate, or low offensiveness?
 - Receptor sensitivity - is the cause of complaint present at a remote or highly sensitive location; is it localised or widespread?

9.1.4 The Site Manager or other Technically Competent Person will subsequently undertake the following further assessment process:

- Review of the operations at the Site prior to and at the time of the complaint;
- Review of the environmental control systems prior to and at the time of the complaint;
- Review of the meteorological conditions (wind speed, wind direction, rainfall, atmospheric pressure) prior to and at the time of the complaint – to establish whether a pathway can be established between the Site and the complainant;
- Review of the previous complaint history at the location identified.

- 9.1.5 Where a significant complaint is substantiated by the Site Manager or other Technically Competent Person, the Operator will contact the Environment Agency to discuss the incident as soon as possible following receipt of the complaint details, allowing sufficient time for the above investigation to be completed, and within a maximum target response period of 24 hours from complaint receipt. If the necessary contact details are available and direct feedback has been requested the Operator will also contact the complainant directly to discuss the issue, the findings of the subsequent investigation, and any actions arising.
- 9.1.6 Once actions have been completed the Site Manager or other Technically Competent Person will visit the complaint location to ensure that the cause of complaint has subsided.

10 SITE DIARY

- 10.1.1 A Site diary consisting of accurate and complete reporting and record keeping shall be maintained at the Site office at all times and will be made available for inspection by the Environment Agency when requested.

11 AUDITS

- 11.1.1 It is noted that this EMS is required to be:
- Continually improving;
 - Assessing prevention of pollution incidents;
 - In accordance with the latest regulatory guidance; and
 - Assessing environmental objectives independent of the Environmental Permit.
- 11.1.2 To assess the bullet points the operator shall undertake internal annual audits of the Environmental Management System, environmental performance, objective and targets and future planned improvements.

APPENDICES:

Appendix 1	Drawing No CE-RW-1303-DW01
Appendix 2	Record of Non-conformance
Appendix 3	WAMITAB
Appendix 4	General Waste Management
Appendix 5	Complaints Record
Appendix 6	Preventative Maintenance Checklist
Appendix 7	Maintenance Record
Appendix 8	Inspection Record
Appendix 9	Environmental Accident and Incident Record
Appendix 10	Training Record
Appendix 11	Training Needs Checklist

APPENDIX 1

Drawing No CE-RW-1303-DW01

APPENDIX 2:

Record of Non-conformance

Record of non-conformance	
Date and time non-conformance identified	
What happened, what was it about?	
What caused it?	
What have you done to make sure that it does not happen again?	
Was there any significant pollution – for example oil entering a surface water drain?	
If there was then you must notify the Env Agency Have you done so?	Yes/No/not applicable Time: Date: EA Incident number:
Please print name and sign:	

APPENDIX 3:

WAMITAB

APPENDIX 4:

General Waste Management

General Waste Management – Waste Received on Site							
Date	Origin (e.g. Newport)	EWC Code	Disposal or Recovery Code	State (solid, liquid)	From another waste facility?	Amount (tonnes)	Comments

General Waste Management – Waste Received on Site							
Date	Origin (e.g. Newport)	EWC Code	Disposal or Recovery Code	State (solid, liquid)	From another waste facility?	Amount (tonnes)	Comments

APPENDIX 5:

Complaints Record

Complaints Record	
Who made the complaint?	
Name:	
Address:	
Phone No:	
Date and time of complaint	
What caused it?	
Was anyone else aware of this? If so who?	
What was the source of the problem, what went wrong? If source is unknown contact a suitably qualified person to investigate.	
What have you done to make sure it won't happen again?	
Was there any significant pollution – for example oil entering a surface water drain?	
<p>If there was then you must notify the EA</p> <p>Have you done so?</p> <p>You must also notify the local Environment Agency Office via email or letter.</p>	<p>Yes/No/not applicable</p> <p>Time:</p> <p>Date:</p> <p>EA Incident number:</p>

Please print name and sign:

APPENDIX 6:

Preventative Maintenance Checklist

Preventative Maintenance Checklist								
Item requiring maintenance	How often? (tick the appropriate box)						Where are maintenance instructions	Who is responsible?
	Day	Week	Month	Year	2 years	5 years		

APPENDIX 7:

Maintenance Record

Maintenance Record		
Item*¹ :	Due*²:	
Completed on	Completed by	Comments
<i>e.g. 13/02/13</i>	<i>A. Person</i>	<i>Blockage in drainage system. Blockage removed.</i>
* ¹ <i>Item e.g. inspect fences, inspect drainage system</i>		
* ² <i>Due e.g. weekly, daily</i>		

APPENDIX 8:

Site Inspection Record

Site Inspection Record			
Date	Item	Inspected (yes/no)	Comments
	Site road and operational Area		
	Storage areas / containment bays		
	Drainage system		
	Dust control		
	Noise control		
	Odour		
	Litter		
	Mud/dirt		
	Vermin and insects		
	Fire (fire-fighting equipment)		
	Security		

APPENDIX 9:

Environmental Accident and Incident Record

Environmental Accident and Incident Record	
Date and time of the incident	
What happened, what was it about?	
Was anyone else aware of this – other witnesses? If so who?	
What caused it?	
What action did you take to fix the problem? Were external agencies involved?	
What have you done to make sure that it does not happen again?	
If there was then you must notify the Environment Agency Have you done so?	Yes/No/not applicable Time: Date: EA Incident number:
Please print name and sign:	

APPENDIX 10:

Training Record

Training Record			
Employee Name		Job Title	

Training Required	Date Due	Date Done	Passed as competent? (yes/no)	Reviewers signature	Date of refresher	Comments	

APPENDIX 11:

Training Needs Checklist

	Environmental Awareness											Comment		
	Permit role and responsibility	Waste Receipt including Duty of Care	Waste treatment and storage	Awareness of local sensitive receptors	Permit conditions and non-conformance	Maintenance of site surface, containment bays and drainage	Bunds, tanks, pipework, interceptor	Fire	Spill response	Failure of Services	Dust emissions		Odour emission	Noise emissions

*Insert other training required in available spaces.