



OLIVE

Compliance

OPERATING TECHNIQUES

O'Brien Aggregate Marsden Ltd

Marsden Quarry Landfill Site Marsden Quarry

Whitburn Sunderland

Tyne and Wear

SR6 7NG

EPR/ GB3206CB

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BASIS OF REPORT

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1.0 Introduction

O'Brien Aggregate Marsden Ltd (OBAM) have instructed Olive Compliance Limited (OCL) to prepare an application for a Bespoke Environmental Permit Variation Application for their site located at Marsden Quarry, Sunderland.

This document provides a summary of the key operational techniques and control measures that will be implemented at the site as a result of the proposed changes.

1.1 Report Structure

This report describes the operating techniques that are to be implemented at the facility to ensure compliance with the conditions of the Environmental Permit. The report has been drafted to satisfy the requirements of Environmental Agency (EA) Guidance¹ and is divided into the following Sections.

Section 1	Introduction
Section 2	Management
Section 3	Operations
Section 4	Emissions and Monitoring
Section 5	Information
Section 6	Closure

¹www.gov.uk/guidance/risk-assessments-for-your-environmental-permit

2.0 Management

2.1 Management System

OBAM operate their own in-house management system which ensures that;

- the risks that the activities pose to the environment are identified;
- the measures that are required to minimise the risks are identified;
- the activities are managed in accordance with the management system;
- performance against the management system is audited at regular intervals; and
- the Environmental Permit is complied with.

The management system is supplemented by this document which outlines the operating techniques at the site and demonstrates conformance with the requirements of relevant Environment Agency guidance (Non-hazardous and inert waste: appropriate measures for permitted facilities and Environmental permitting: landfill sector technical guidance).

2.1.1 Management Structure and Responsibilities

The Operator/Site Manager is responsible for day-to-day operations and compliance with the Environmental Permit with support from the site TCM.

Whenever the site is open to receive or dispatch wastes, or will carry out any of the waste management operations, it will be supervised by at least one member of staff who is suitably trained and fully conversant with the requirements of the permit regarding:

- waste acceptance and control procedures;
- operational controls;
- maintenance;
- record-keeping;
- emergency action plans; and
- notifications to the Environment Agency.

2.1.2 Technical Competence and Training

The site will be managed by sufficient staff, competent to operate the site. The management system will deliver the following:

- all staff will have clearly defined roles and responsibilities;
- records will be maintained of the skills required for each post;
- records will be maintained of the training and relevant qualifications undertaken by staff to meet the requirement of each post; and
- operations will be governed by standard operating instructions.

Operations at the site will be under the overall control of a technically competent person who holds the relevant Certificate of Technical Competence (COTC) under the Waste Management Industry Training and Advisory Board (WAMITAB) scheme.

Certificates are included within the application for the Technically Competent Manager.

An assessment of staff training needs will be carried out to identify the posts for which specific environmental awareness training is needed, and to determine the scope and level of such training.

The assessment of training needs will be reviewed on an annual basis.

Details of staff training procedures and recording are included in Section 11.2 of the management system.

The training programme will ensure that relevant staff are aware of the following:

- regulatory implications of the permit for the site and their specific work activity;
- all potential environmental effects from operations under normal and abnormal circumstances;
- the need to report deviations from the permit; and
- prevention of accidental emissions and the action to be taken should accidental emissions occur.

2.1.3 Site Security

Details of site security are included in Section 9.2 of the management system.

In order to prevent unauthorised access, a number of site security measures will be in place at the site including;

- Secure gates which will be locked when the site is not in use;
- Fencing along the entire site boundary; and
- CCTV coverage of all operational areas, with out of hours security monitoring.

The site will be inspected at the commencement of each working day. Any defects or damage which compromises the integrity of the enclosure will be made secure by temporary repair as soon as is practicable. Permanent repairs will be affected as soon as practicable.

All inspections, any defects, damage or repairs will be recorded in the site diary.

2.1.4 Permit Surrender

To assist in permit surrender, records will be maintained to demonstrate how the land beneath the site has been protected at all times between the date of permit issue and the end of permit operations.

Records to be maintained will include:

- maintenance of site surfacing;
- maintenance of drains and containment systems; and
- actions taken to clean up incidents and spillages.

2.1.5 Display of Environmental Permit

A copy of the Environmental Permit will be kept available for reference by all staff and contractors whose work may have an impact on the environment. All staff will be informed where the Environmental Permit is kept.

2.1.6 Managing Documentation and Records

Controls will be in place to ensure that all documents are issued, revised and maintained in a consistent fashion.

The documents that will be included within the scope of the controls are as follows:

- policies;

- responsibilities;
- maintenance records;
- procedures;
- inspections and monitoring records;
- results of reviews;
- complaints and incident records; and
- training records.

Records will be made and kept up to date on a daily basis to reflect deliveries, on site treatment and dispatches. All records relating to waste acceptance will be maintained and kept readily available on site and kept for a minimum of 2 years after the waste has been removed off site.

2.1.7 Reporting Non-Compliance and Taking Corrective Action

Procedures as detailed in Section 3,9 and 10 will ensure appropriate corrective action is taken in response to problems identified at the site. The procedure will ensure that non-conformances are reported, investigated and rectified, and that failures and weaknesses are prevented. The following aspects will be considered:

- actual or potential non-compliance;
- system failure discovered at internal audit;
- suppliers or subcontractors breaking the agreed operating rules;
- incidents, accidents, and emergencies;
- malfunction, breakdown or failure of plant;
- other operational system failure; and
- complaints.

The action taken in response to the non-conformance may include:

- obtaining additional information on the nature and extent of the non-conformance;
- discussing and testing alternative solutions;
- modifying procedures and responsibilities;
- seeking approval for additional resources and training; and
- contacting suppliers and contractors (as applicable).

2.1.8 Inspections and Legal Compliance

There will be a formalised internal inspection and auditing procedure to ensure the facility is audited at defined intervals and that the progress of corrective and preventative action is monitored.

The frequency and nature of the audits is outlined in Section 10.6 of the EMS.

2.1.9 Monitoring, Measuring and Reviewing Environmental Performance

A formalised management structure will review environmental performance, and ensure any necessary actions are taken.

2.1.10 Operational Control, Preventative Maintenance and Calibration

The management system will complement operational procedures so as to ensure effective control of site operations, the use of approved suppliers and contract services, the maintenance of operational equipment and the calibration of monitoring equipment.

All plant and equipment will be subject to a programme of planned preventative maintenance which will follow the inspection and maintenance schedule recommended by the manufacturer.

2.1.11 Design and Construction Quality Assurance

All relevant elements of the site (not already constructed) will be designed in accordance with recognised standards, methodologies and practices.

The design process will use a risk-based approach and will be appropriately documented using drawings, specifications and method statements where appropriate to provide an adequate audit trail.

A competent and suitably qualified person will supervise the construction activities.

2.2 Accident Management Plan

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

An accident management plan will be implemented and maintained at the site to ensure the site and site staff are fully prepared for any 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 occurrence.

The following accident management plan describes the techniques that will be implemented to minimise the risks posed to the environment. Activities affecting the health and safety (H&S) of operatives, contractors and visitors will be separately managed in compliance with H&S regulation and company H&S Policy.

2.2.1 Hazard Identification

The following accident hazards have been identified from the Environment Agency's Generic Risk Assessments;

- Unauthorised Waste Acceptance;
- Flooding;
- Arson and/or Vandalism;
- Accidental Fire; and
- Spillage of Liquids.

The company will employ a number of measures to prevent the realisation of these hazards to the environment and human health.

The Accident Management Plan is included in Section 13 of the EMS.

2.2.2 Unauthorised Waste

Acceptance of unauthorised materials has the potential to cause harm to the environment and human health for example the receipt of dusty wastes could impact the amenity of the site's neighbours. All wastes received at the site will be subject to inspection and checking against the declaration on the hazardous waste consignment note. In the event that unauthorised waste is delivered to the site, the waste will be segregated and stored in a designated quarantine area within the building prior to export from site to a suitably permitted facility for recovery or disposal.

The waste acceptance procedures are included in Section 7.1.1 to 7.1.4 of the EMS.

2.2.3 Fire Prevention Plan

The risk of accidental combustion of the waste types accepted at the site is low.

- incompatible materials will not be accepted at the site;
- the plant inspection schedule will include checks of electrical equipment within the site to ensure that any faults are identified and repaired;
- fire extinguishers will be provided at designated locations;
- smoking will not be permitted in the operational areas of the site;
- working practices will ensure the assessment of fire hazards and training of employees in fire prevention, e.g. the use of fire extinguishers and emergency procedures; and
- no wastes will be burned on the site and any fire at the site will be treated as an emergency.

In the event of a major fire, the following action will be taken:

- the Operator/Site Manager and Fire Brigade will be notified immediately and the Environment Agency as soon as practicable;
- the burning area will be isolated, and attempts will be made to extinguish the fire utilising the onsite fire extinguishers if safe to do so; and
- the site and buildings will be evacuated.

The site has emergency fire procedures in place within the EMS supported by onsite measures such as traffic management plan, emergency contacts, fire extinguisher and hydrant location plans.

2.2.4 Loss of Containment

Loss of containment could lead to spillage and leakage of potentially contaminating liquids. To prevent loss of containment and minimise the risk and impact of releases the following measures will be implemented:

- *Containment system:* any facilities for the storage of oils, fuels or chemicals will be sited above ground on impervious bases and surrounded by impervious bund walls. The volume of the bunded compound will be at least the equivalent to the capacity of the tank plus 10%. All filling points, vents and gauges will be located within the bund.
- *Storage tanks:* storage tanks will be constructed to the appropriate British Standard;
- *Inspection:* tanks will be inspected visually on a daily basis by the site staff to ensure the continued integrity of the tanks, and identify the requirement for any remedial action;
- *Spill kits:* materials suitable for absorbing and containing minor spillages will be maintained on site; and
- *Monitoring techniques:* the site staff will undertake daily monitoring for evidence of spillage and leakage.

In the event of any potentially polluting leak or spillage occurring on site, the following action will be taken:

- Minor spillages will be cleaned up immediately, using sand or proprietary absorbent. The resultant materials will be placed into containers and will then be removed from site and disposed of at a suitably permitted facility. The incident will be logged in the site diary.
- Any dry wastes spilled on site will be collected and transported to the appropriate area of the site.
- In the event of a major spillage, which is causing or is likely to cause polluting emissions to the environment, immediate action will be taken to contain the spillage and prevent liquid from

entering surface water or drains. The spillage will be cleared immediately and placed in containers for offsite disposal, and the Environment Agency will be informed.

The spillage procedure is included in Section 8 of the EMS.

2.2.5 Security and Vandalism

As detailed in Security Management the following security measures are in place;

- *Site perimeter*: the site benefits from fencing around the perimeter;
- *Security gates*: will be locked at all times when the facility is unattended, and the site gate will be locked when the site is not in use at the entrance of the site;
- *Inspection*: gates and fencing extending around the site will be inspected regularly by the operations staff to identify deterioration and damage, and the need for any repairs;
- *Maintenance and repair*: fencing and gates will be maintained and repaired to ensure their continued integrity. In the event that damage is sustained repairs will be made by the end of the working day. If this is not possible, suitable measures will be taken to prevent any unauthorised access to the site and permanent repairs will be affected as soon as practicable;
- *Authorised access system*: all visitors to the site will be required to register in the visitor's book and sign out again on exit to minimise the risk of unauthorised visitors being present on site; and
- *Monitoring techniques*: operational procedures, including regular inspections will ensure continual monitoring of security provision at the site;

In the event of a breach of security at the site, the cause will be investigated, and appropriate mitigation measures implemented. Records to be maintained include inspections and maintenance of security fencing and gates, breaches of security, investigations and actions taken.

2.2.6 Flooding

The site is not identified to be in a flood risk area.

3.0 Operations

3.1 Process Description

Wastes will be accepted in accordance with waste acceptance procedures set out below. Wastes accepted at the site for processing will undergo one or a number of the following treatments prior to treatment or use on site.

- Pre Acceptance
- Waste Acceptance
- Waste Carriers
- Waste Transfer Notes

3.2 Permitted Activities

The waste management carried out are described and limited to those within the site permit. The activities are specified in Annex I and Annex II of the Waste Framework Directive 2008 as follows.

Table S1.1 activities	
Specified activity and WFD Annex I and II operations	Activity description and limits of specified activity
D1: Deposit into or on to land	The disposal of inert waste into or onto land.
Inert Transfer Station with Treatment	
D9 - Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are disposed of by any of the operations numbered D01 to D12 D14 - Repackaging prior to submission to any of the operations numbered D01 to D13 D15 - Storage pending any of the operations numbered D01 to D14 (excluding temporary storage pending collection on the site where it is produced). R3 - Recycling/reclamation of organic substances which are not used as solvents R5 - Recycling/reclamation of other inorganic materials R13 - Storage of wastes pending any of the operations numbered R01 to R12 (excluding temporary storage pending collection on the site where it is produced).	Wastes having any of the following characteristics shall not be accepted: • Consisting solely or mainly of dusts, powders or loose fibres • Wastes that are in a form which is either sludge or liquid Treatment consisting only of sorting, separation, screening, crushing and blending of inert waste for recovery as a soil, soil substitute or aggregate Waste shall be stored and treated on hard standing or on an impermeable surface with a sealed drainage system. Waste types as specified in Table S2.1

3.2.1 Permitted Types and Quantities of Waste

The site can accept 450,000 tonnes of waste per annum.

The list of wastes is detailed within the current permit.

3.3 Waste Acceptance

3.3.1 Hours of Operation

Hours of operation for the receipt, treatment, disposal, and transfer of waste shall normally be:

- Monday to Friday: 07.00 to 17.00 hours
- Saturday: 07:00 – 13:00 hours
- Sunday: by exception only.

No operations will occur outside these hours without prior written consent of the Environment Agency.

If the site needs to be opened outside these hours, the Environment Agency and Planning Authority will be notified.

3.3.2 Load Inspection and Waste Control

All vehicles are brought to site by the Operator or third parties, where the load will be visually inspected upon collection, if possible, in order to confirm its description and composition against the consignment note and other accompanying documentation.

Wastes will only be accepted at the site if the description in the accompanying documentation is in accordance with the permit and that onsite inspection confirms waste is consistent with the description provided.

All wastes will be characterised during the pre-acceptance stage of the waste acceptance process, which will include the customer providing information such as WM3 analysis, WAC Analysis and LOI data to ensure that the waste has been correctly classified and permitted for acceptance, treatment, or disposal at O'Brien's Aggregates Marsden Ltd.

Should the wastes be found not to conform during the initial visual inspection, then the details will be recorded and the vehicle turned away. Should wastes already be discharged within the stockpile area and deemed not to conform or otherwise not be permitted then the waste will be picked out and:

- reloaded and returned; or
- removed to a designated quarantine area as appropriate

Records of non-compliant waste received at the site will include details on:

- the quantity;
- characteristics;
- origin;
- delivery date and time; and
- the identity of the producer and carrier

Wastes will not be accepted unless the site is adequately resourced to receive the waste.

A record will be kept in the site diary of all rejected wastes. The waste producer and the Environment Agency will be notified of significant non-conformance.

3.3.3 Means of Measurement

The quantity of waste accepted and despatched from the facility will be measured via the onsite use of the weighbridge to record the volume of waste entering the site.

All wastes entering the site will be recorded upon arrival and the waste and recyclable components removed from site for disposal for further recovery or reuse will also be recorded on exit.

3.4 Waste Storage

Maximum waste storage on site at any one time will be managed in accordance with the sites Layout Plan (Plan 2).

All incoming wastes are stored on hardstanding with washed aggregates, sands etc, will be stored on an impermeable liner with a comprehensive water management system installed.

Following washing and grading, aggregates will be stored in a pre-existing material storage area which is underlain by an impermeable liner, limiting vertical migration of residual wash water.

3.5 Waste Treatment

TREATMENT - SOIL WASHING – STONES & AGGREGATES

The inert waste will be fed into the wash plant where it will undergo a fully automated treatment process. The washing process will allow the separation and recovery of sand, and various grades of single size clean aggregate.

OBAM will apply the WRAP Quality Protocol (Current Version June 2022) to these materials to create a non-waste. This will enable the company to recover a greater number of aggregates from the materials brought into the site for treatment.

Other outputs from the wash process

- a small metal fraction.
- several grades of stones, gravel and sand (aggregates).
- A final silt-like fraction (filter-cake). This material will have a LOI of less than 10 and will be periodically tested to ensure that the material is correctly classified under WM3 and identified for removal off site for further recovery or disposal off site.

TREATMENT – CRUSHING & SCREENING – STONES & AGGREGATES

Should any inert materials arrive at site, and not be deemed suitable or requires entering the soil washing process, they may be processed using the original crushing and screening methods to produce various grades of recycled aggregate.

LANDFILLING OF INERT WASTE

Inert waste that is not deemed suitable for either washing, crushing, or screening, will be disposed of within the inert landfill in line with waste acceptance procedures.

3.6 Wash Plant Activities

Detailed specifications and layouts for the proposed wash plant are included in Appendix I. However, as an outline, it can be confirmed that Inert waste will be fed into the system via a conveyor, from which the washing and grading process will begin.

Wash water is contained within a closed loop system, with the principal wash elements to include:

- Clarifying Tank,
- Thickener Tank,
- Sludge Tank,
- Filter Press.

The wash plant will be monitored via an inside control room by a trained plant operator and will process between 1,000 to 1,500 tonnes per day which is in accordance with the sites current allowed annual throughput of 450,000 tonnes when considering the number of operational days within the year.

The wash plant will hold 295m³ of wash water supplied and topped up via mains supply, bowsers or where necessary from a nearby quarry lagoon.

A rain harvesting system is also to be installed on structures to collect rainwater which will be directed to the clarifier tank. The wash water will be re-circulated within a closed loop system, with filter cake dewatered prior to leaving the plant to retain as much water as possible.

Physical barriers will be put in place to minimise water loss through the wash process. It is anticipated that 95% of water will be retained by the plant. As such, it is estimated that the daily 'top-up volume' will be less than 15m³ per day.

A flocculant (SPERFLOC A-130) will be used to aid with the removal of suspended particles and aid with wash water retention and fines extraction. The flocculant is Non-Hazardous and has low mobility in soil and all components used in its manufacture are included in the European Inventory of Existing Chemical Substances (EINECS) or are not required to be listed on EINECS.

Final aggregate gradings will depend on plant operations, however, at this stage, it is considered the following product and filter cake gradings can be achieved.

- 10 mm single size,
- 20mm single size,
- 40mm single size,
- 75mm single size,
- Course building sand 0-8mm,
- Fine sand 0- 4mm,
- Filter cake 0-3mm.

Following washing and grading, aggregates will be stored in a pre-existing material storage area which is underlain by an impermeable liner, limiting vertical migration of residual wash water.

All plant and equipment must comply to PUWER regulations and operators must carry out pre start inspections on all plant and equipment.

A maintenance schedule is in place which includes servicing, calibration and preventive maintenance. All equipment on 3 phase power supply are subject to a 6 monthly EIRC by a competent contractor. Air receivers and air hoses are subject to 3 monthly inspections.

Return valves are installed where required, gate valves are also secured to prevent accidental release and all operators must be trained, competent and authorised by the Quarry Manager to operate plant and equipment in the Quarry.

Emergency procedures will be put in place which will include for the following:

- Maintain a stock of repair patches,
- Spill kits to be kept on site and around wash plant area,
- Emergency spillage drills to be carried out,
- Sludge tank and pipework emptied at the end of each shift,
- A maintenance schedule is in place which includes servicing, calibration and preventive maintenance,
- 24hr Remote CCTV surveillance in operation.

The wash plant will be in operation between 07:00 and 17:00 hours between Monday and Friday and 07:00 to 13:00 on Saturday. No work will be undertaken in connection with the plant machinery outside of these approved hours or on any public or bank holiday.

3.7 Site Infrastructure and Equipment

3.7.1 Site Identification Board

A site identification board which is easily readable from outside the entrance during hours of daylight will be provided at or near the main site entrance.

The identification board will be inspected at least once per week. In the event of damage or defect that significantly affects the legibility of the board it will be repaired or replaced within a timescale agreed with the Environment Agency.

The board will display the following information:

- Site name and address;
- Permit holder;
- Permit number (s);
- Emergency contact name and telephone number;
- Environment Agency national telephone numbers; and
- Days and hours site is open to receive waste.

3.7.2 Plant and Equipment

All items of plant and equipment used on site will be maintained in accordance with manufacturer's recommendations.

4.0 EMISSIONS AND MONITORING

The site will be operated so that there will be no fugitive emissions to air, surface water, groundwater or land.

4.1 Surface Water and Groundwater

The site will accept permitted wastes only and will be operated to prevent fugitive emissions to surface water and groundwater.

4.1.1 Engineered Containment

All waste will be stored and treated storage on an impermeable surface with a sealed drainage system.

4.1.2 Containment Bunding

All potentially polluting materials for example oils and fuels will be stored in containers provided with secondary containment. Containers and secondary containment will be impermeable, resistant to the stored materials and constructed to the appropriate British Standard.

Containers will be surrounded by a leakage containment bund capable of containing at least 110% of the volume of the largest container within the bund or 25% of the total container volume within the bund, whichever is the greater.

Pipework will be routed within bunded area ensuring no penetration of the secondary container. Tanker connection points will be within the bund.

Containers/Tanks will be inspected visually on a daily basis by the site staff to ensure the continued integrity of the containment and identify the requirement for any remedial action.

4.2 Odour

No putrescible or readily degradable wastes will be accepted at the site. Due to the strict control of the waste that will be accepted at the site, odour is not expected to pose a significant risk.

4.3 Dust

No waste consisting solely or mainly of dusts, powders or loose fibres will be accepted at the site. Due to the types of waste accepted and the strict control of the waste that will be accepted at the site, dust is not expected to pose a significant risk.

In the event the generation of dust occurs during storage or treatment of wastes, this will be monitored and mitigation methods such as dampening will be employed to reduce the risk of fugitive dust emissions.

These wastes will not be stored longer than 48 hours unless otherwise agreed with the Environment Agency.

Daily site inspections will be carried out by site staff during the course of their normal working activities.

The procedure for managing complaints is detailed below.

Upon receiving a complaint initially, a site diary entry will be made, with a complaint report completed and discrepancy log will be completed by the Site Manager/TCM.

A record of the below will be made.

- Time
- Date
- Nature of complaint/description of noise
- Duration of event
- Weather conditions
- Location – where noise was heard (eg: site perimeter), receptor location
- Contact details of complaint if available
- Further monitoring and locations

Then a review of the below would be made.

- Site activities at the time of the report must be conducted (eg; processing, increased vehicle movements, waste deliveries)
- Findings of external/receptor monitoring;
- Finding of any other external sources of noises (eg; construction/development)
- CCTV system to view site operations;

As part of the Environmental Management System, a customer care and complaints procedure will be implemented. The customer care and complaints procedure apply to all complaints, feedback and requests made by third parties regarding the site's operational activities, environmental, health and safety performance or quality of service/product.

A site specific DEMP is in place.

The management of dust emissions is detailed in Section 10 and IMS Procedure 154 of the EMS.

4.4 Noise

Waste treatment operations will only be carried out during operational hours. All equipment will be maintained and operated in accordance with manufacturer's guidance and will be maintained in good working order.

The site will be operated so as to minimise noise emissions from the site. Measures that will be taken at the site include:

- locating plant away from noise-sensitive receptors where possible;
- the avoidance of dropping materials from height;
- switching plant off when not in use;
- the imposition of a speed limit for vehicles delivering waste to the site. The site has 10mph Speed Limit This will reduce noise associated with high engine speeds;
- the training of all personnel in the need to minimise site noise, and will be responsible for monitoring and reporting excessive noise when carrying out their everyday roles;
- regularly maintaining site plant and machinery to minimise noise resulting from inefficient operation of pumps, generators and engines;

- in the event that reversing alarms are found to give rise to complaints, alternative alarms or technology will be investigated;
- the regular maintenance of site surfaces to prevent the development of potholes will significantly reduce the noise generated particularly by empty vehicles exiting the site;
- consideration will be given to the fitting of noise suppression kits on items of plant and equipment; and
- all plant will be maintained in accordance with manufacturer's recommendations to minimise noise emissions.

Any complaint received will be logged in the site diary. The Site Manager will investigate the complaint and will take action to identify the source of the noise and implement remedial measures where appropriate.

The measures employed at the site to minimise the emission of noise will be regularly reviewed by the Site Manager and additional measures will be employed where required.

The management of noise emissions is detailed further in 10.4 and IMS procedure 127 of the EMS.

4.5 Pests

Due to the nature of the wastes proposed to be accepted at the site, it is not anticipated that pests will pose a risk at the facility.

The facility will be inspected by both site management and operatives for infestations of pests, vermin and insects on a routine basis.

A specialist pest control contractor will be deployed if required.

The management of pests is further detailed in 10.5 of the EMS.

4.6 Litter

Due to the nature of the waste to be accepted on site, it is not anticipated that litter will pose a serious risk. However, the boundary of the site and its environs will be regularly checked and any litter and clean it up. The site will benefit from a perimeter fence which will limit the potential for litter to escape off-site.

It will be the responsibility of the site staff to monitor the site for any signs of escaping materials either from within the site or from vehicles delivering or removing materials to and from the site.

Inspections will be carried out on a daily basis and a record maintained within the site diary.

The management of litter is detailed further in 10.2 of the EMS.

4.7 Mud and Debris

The top section of the road site is surfaced with concrete, tarmac and hardstanding and fully drained. It is therefore not expected that mud will feature as a problem for the site within the site, the following measures will be taken in order to prevent the deposition or tracking of mud or debris from the site onto public areas or highways:

- site surfaces will be maintained free of significant quantities of mud;
- wheel cleaning facility on site;
- all operational areas will be subject to monitoring by staff throughout the working day;

- all vehicles leaving operational areas will, before leaving the site be checked to ensure that they are clear of loose waste and that any products being exported from the site are secure.

In the event that mud, debris or waste arising from the site is deposited onto public areas outside the site, the following remedial measures will be implemented:

- the affected public areas outside the site will be cleaned; and
- traffic will be isolated from sources of mud and debris within the site to prevent further tracking of mud and debris, and measures will be taken to clear any such sources as soon as practicable.

4.7.1 Monitoring

The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring and any other actions specified in the following tables in schedule 3 to the permit.

- a) Leachate specified in tables S3.2 and S3.7
- b) Groundwater specified in tables S3.3 and S3.6;
- c) Landfill gas specified in tables S3.4 and S3.4A and S3.4B;
- d) Particulate matter specified in table S3.5.
- e) Noise specified in table S3.8

The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.

A topographical survey of the site referenced to ordnance datum shall be carried out and shall be used to produce a plan of a scale adequate to show the surveyed features of the site:

- a) annually; and
- b) prior to the disposal of waste in any new cell or new development area of the landfill; and
- c) following closure of the landfill or part of the landfill.

5.0 INFORMATION

All relevant notifications and submissions to the Environment Agency regarding the site will be made in writing and will quote the permit reference number and the name of the permit holder.

Records will be maintained for at least 3 years, however in the case of off-site environmental effects, and matters which affect the condition of land and groundwater the records shall be kept until permit surrender. Duty of Care records will be kept for a minimum of 2 years with hazardous consignment notes retained for 3 years or the lifetime of the permit.

5.1 Reporting and Notifications

5.1.1 Changes in Technically Competent Persons

The Environment Agency will be informed in writing of any changes in the technically competent management of the site and the name of any incoming person, together with evidence that such person has the required technical competence.

5.1.2 Waste Types and Quantities

A summary report of waste types and quantities accepted and removed from the site for each quarter, will be submitted to the Environment Agency within 1 month of the end of the quarter unless otherwise required by the permit conditions.

5.1.3 Relevant Convictions

The Environment Agency will be notified of the following events:

- The company or directors being convicted of any relevant offence; and
- any appeal against a conviction for a relevant offence and the results of such an appeal.

5.1.4 Notification of Change of Operator's or Holder's Details

The Environment Agency will be notified of the following:

- any change in the operator's trading name, registered name or registered office address; and
- any steps taken with a view to the company going into administration, entering into a company voluntary arrangement or being wound up.

5.1.5 Adverse Effects

The Agency will be notified without delay following the detection of the following:

- any malfunction, breakdown or failure of equipment or techniques;
- any accident;
- fugitive emissions which have caused, is causing or may cause significant pollution; and
- any significant adverse environmental and/or health effect.

5.1.6 Reporting

The operator shall send reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.

A report or reports on the performance of the activities over the previous year ('the annual report') shall be submitted to the Environment Agency by 31st January each year or such other date as may be agreed in writing by the Agency. The report(s) shall include as a minimum:

- (a) a review of the results of the monitoring and assessment carried out in accordance with this permit against the relevant assumptions, parameters and results in the risk assessments submitted in relation to this activity and any agreed amendments thereto. The review will include written descriptions of the improvements made to operational performance during the year, action plans developed and planned improvements for the coming year;
- (b) the topographical surveys required by condition 3.4.3 other than those submitted as part of a CQA validation report;
- (c) the volumetric difference (reported in cubic metres) between the most recent topographical survey and the previous annual topographical survey i.e. the additional volume of the landfill void that is occupied by waste;
- (d) an assessment of the settlement behaviour of the landfill body based on the difference between the most recent topographical survey and previous annual topographical survey for the areas of the landfill which did not receive waste between the surveys;

- (e) a calculation of the remaining capacity (reported in cubic metres) derived from the pre-settlement contours and the most recent topographical survey.

Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

- (f) in respect of the parameters and emission points specified in schedule 4, table S4.1;
- (g) for the reporting periods specified in schedule 4, table S4.1 and using the forms specified in schedule 4, table S4.2 or other reporting format as agreed in writing with the Environment Agency; and
- (h) giving the information from such results and assessments as may be required by the forms specified in those tables.

Within one month of the end of each quarter, the operator shall submit 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.

5.1.7 Notifications

In the event:

a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately.

- inform the Environment Agency,
- take the measures necessary to limit the environmental consequences of such an incident or accident, and
- take the measures necessary to prevent further possible incidents or accidents;

b) of a breach of any permit condition the operator must immediately

- inform the Environment Agency, and
- take the measures necessary to ensure that compliance is restored within the shortest possible time.

c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.

6.0 Closure

This report has been prepared by Olive Compliance Ltd with all reasonable skill, care and diligence, and taking account of the manpower and resources devoted to it by agreement with the client. Information reported herein is based on the interpretation of data collected and has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of O'Brien Aggregate Marsden Ltd, no warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from Olive Compliance Ltd.

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