# Benfleet Soil and Aggregate Recycling Facility

# 784-B072464

# Operating Techniques Version 3

## Environmental Permit Variation Application

**Benfleet Scrap Co Limited**

**May 2026**

**Document prepared on behalf of Tetra Tech Limited**

**Registered in England number: 01959704**

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# 1.0 Introduction

## 1.1 Report Context

1.1.1 This section of the Environmental Permit application corresponds to Section 3 of Part C4 of the Environmental Permit application forms and specifically details the operating and management procedures for the proposed activities that will be in place at the site.

1.1.2 This Environmental Permit Variation Application has been prepared by Tetra Tech Limited on behalf of the Operator, Benfleet Scrap Co Limited (Benfleet).

1.1.3 This document relates to Benfleet's site Benfleet Soil and Aggregate Facility located at Towerfield Business Park, Fane Road, Benfleet, SS7 3NH.

1.1.4 The site is situated on an industrial park in between New Thundersley to the south and Rayleigh to the east just to the southeast of the busy junction between the A127 and the A1245 and is centred at approximate National Grid Reference (NGR) TQ 78095 90299.

1.1.5 Benfleet currently hold a Standard Rules Environmental Permit SR2015 No 6 (EPR/MP3325SU) for the site which was issued in July 2020 to D. C. Donovan and transferred to Benfleet Scrap Co Limited in January 2024.

1.1.6 It is the intention of Benfleet Scrap to apply for a Bespoke Environmental Permit for a Waste Soil and Aggregate Facility. It was hoped to apply for the new SR2022 No.1 standard rules permit but it was found that since the original standard rules permit was issued a new protected habitat (deciduous trees) has been found to the south east of the site.

1.1.7 The bespoke permit will be mainly in line with the conditions set out in the new SR2022 No.1 permit as follows:-

- Only specified waste types will be treated to produce aggregates;
- Only specified waste types will to be treated to produce soils;
- Up to 200,000 tonnes of waste per year to be accepted at the site (different to SR2022 No. 1);
- Up to 75,000 tonnes of waste per year for specified waste types to be accepted at the site;
- Up to 10,000 tonnes of waste for specified waste types to be stored on site at any time;

- Up to 50,000 tonnes of waste to be stored on site at any time;
- Sorting, separation, screening, crushing, and blending; and
- Treatment will be done in accordance with the specified rules as set out in SR 2022 No.1.

# 2.0 Site Description

## 2.1 Overview of Site Activities

2.1.1 All site activities will be undertaken in accordance with EA Guidance 'Non-hazardous and inert waste: appropriate measures for permitted facilities' (Appropriate Measures).

Physical Treatment Facility

2.1.2 Benfleet are currently operating a treatment of waste to produce soil, soil substitutes and aggregate facility under a Standard Rules Permit SR2015 No 6.

2.1.3 This variation will allow for the importation of 200,000 tonnes per annum.

2.1.4 The operation of the waste transfer station will fall under the following Recovery and Disposal codes (R and D codes) shown in Table 1, provided for in Annex II to Directive 2008/98/EC of the European Parliament and The Council of 19th November 2008 Waste.

**Table 1: Permitted R&D Codes**

| R/D Code | Limits of specified activity |
|---|---|
| R3 (Recycling and reclamation of organic substances which are not used as solvents) and<br><br>R5 (Recycling and reclamation of other inorganic materials) | • Treatment is limited to sorting, separation, screening, crushing and blending of waste for recovery as a soil, soil substitute or aggregate.<br>• Treatment does not include soil or aggregate washing.<br>• No more than 75,000 tonnes of waste types listed in Table 2.3b, except soil and stones waste code 17 05 04 shall be accepted per year.<br>• No more than 200,000 tonnes of waste in total shall be accepted per year.<br>• Treatment of slags and ashes for recovery shall not exceed 75 tonnes per day.<br>• Wastes used to produce aggregate are limited to those waste codes and types listed in Appendix A.<br>• Wastes used to produce soil and soil substitutes are limited to those waste codes and types listed in Appendix A. |
| R12 (excluding temporary storage, pending collection, on the site where it is produced) and<br><br>R13 (Storage of wastes pending any of the operations numbered R1 to R12) | • No more than 50,000 tonnes in total of waste shall be stored at any one time.<br>• No more than 10,000 tonnes of waste types listed in Table 2.3c shall be stored at any one time.<br>• No waste shall be stored for longer than 12 months. |

## 2.2 Operating Hours

2.2.1 The proposed operating hours of the Facility will be as follows:

- 07:00 – 18:00 Monday – Saturday.

## 2.3 Waste Types

2.3.1 A complete list of waste codes for the permitted physical treatment facility is provided in Appendix A.

## 2.4 Waste Quantities

Physical Treatment Facility

2.4.1 The existing permitted physical treatment facility has an annual throughput of less than 75,000 tonnes. This will change for this permit variation to 200,000 tonnes.

## 2.5 Site Layout

2.5.1 A site layout plan is provided on Drawing Number 3376-002-03.

2.5.2 There will be a designated waste unloading area, treatment area, and storage areas for loose stockpiles. There is a weighbridge to the east of the permitted area.

## 2.6 Plant and equipment

2.6.1 The following items and machinery may be available for use on site: -

- Front end loading vehicle (FEL);
- 360 grab excavator;
- Mobile screener;
- Mobile crusher;
- Tractor bowser;
- Telehandler;
- Hopper;
- Conveyor;
- Over band magnet; and
- Gravel sizing screen.

2.6.2 All plant and equipment will be maintained in accordance with the manufacturer's guidance. A planned preventative maintenance programme for all machinery on site will be

implemented to ensure that equipment is repaired prior to failure. Staff will only be permitted to operate machinery and undertake activities for which they have received appropriate training. This remains in accordance with Section 2.1 of the Appropriate Measures.

2.6.3 Process Flow Diagrams of the processing equipment have been provided within Appendix B to meet Section 5 of the Appropriate Measures.

## 2.7 Site Surfacing/Infrastructure

2.7.1 All areas of hardstanding will be visually inspected at least weekly to ensure their continuing integrity and fitness for purpose. The inspection and any necessary maintenance will be recorded. In the event that any damage breaches the integrity of the engineered containment so that it no longer meets the required standards, necessary remedial work will be completed as soon as practicable.

2.7.2 Site drainage will be provided in all areas of the surface. The site drainage system will be subject to weekly visual inspection to ensure effective operation and integrity of the system. Maintenance will be undertaken to ensure the effective operation and defects will be rectified as soon as possible.

2.7.3 Allocated parking for staff and visitors is provided on site as shown indicatively on Drawing Number 3376-002-03.

2.7.4 Allocated storage of fuels and lubricants associated with mobile plant on site is provided.

2.7.5 The measures implemented above meet the requirements of Section 6 of the Appropriate Measures.

# 3.0 Waste Acceptance Procedures

## 3.1 Pre-acceptance

3.1.1 All waste pre-acceptance procedures will be undertaken in accordance with Section 3.1 of the Appropriate Measures guidance.

3.1.2 Prior to accepting waste from new customers, Benfleet will obtain and record information on the types of wastes to be accepted, the process producing the waste, predicted quantities, the form of the waste and any potential hazards associated with the wastes.

3.1.3 The information provided is reviewed against the site permit and the site-specific requirements relating to incoming waste and discussed with the suitably trained nominated person.

3.1.4 If the waste is confirmed to be acceptable at the site, a contractual arrangement is made with the waste supplier. The contract details the criteria for acceptance/rejection of loads delivered to the site for processing.

3.1.5 Regular feedback on the quality of waste delivered to the site is provided verbally to each waste supplier.

3.1.6 If the waste is deemed unacceptable, the customer will be notified, and the waste will be immediately directed to the quarantine area.

3.1.7 The facility will require the following information in written or electronical form prior to acceptance in accordance with Section 3.1 of Appropriate Measures:-

- Details of the waste producer including their organisation name, address and contact details;
- A description of the waste;
- The waste classification code (also referred to as a List of Waste (LoW) or European Waste Classification code;
- The source of the waste (the producer's business and the specific process that has created the waste);
- Information on the nature and variability of the waste production process;
- Information about the history of the producer site if it may be relevant to the classification of the waste (for example soils and other construction and demolition arisings from a site contaminated by previous industrial uses);
- The waste's physical form;

- The waste's composition (based on representative samples if necessary);
- A description of the waste's odour and whether it is likely to be odorous; and,
- An estimate of the quantity you expect to receive in each load and in a year.

3.1.8 Following the assessment and classification of waste, the site operators will technically assess the suitability of waste with regard to the treatment and storage facilities on site to ensure the conditions of the permit are met. Should the waste comply, the site is permitted to accept the waste.

3.1.9 All records relating to the pre-acceptance will be kept for cross-reference a verification at the waste acceptance stage. These records will be kept for a minimum of 3 years.

3.1.10 Benfleet will reassess the information required at pre-acceptance on an annual basis or if the following apply:-

- Waste changes;
- Process giving rise to the waste changes; and
- Waste received does not to conform to the pre-acceptance information.

3.1.11 Following the approval of accepting waste from a customer, the suitably trained nominated person relevant to their position will ensure that visual, physical, and odour-based checks are undertaken upon the receipt of waste. The criteria for non-conformance and rejection of waste will also be recorded, and the member of staff checking the waste can decide on additional parameters of how to check the waste.

## 3.2 Acceptance Procedures

3.2.1 All waste acceptance procedures will be undertaken in accordance with Section 3.2 of the Appropriate Measures.

3.2.2 The suitably trained nominated person will ensure that all characteristics of the waste received matches the information provided during waste pre-acceptance. If the waste does not conform to the pre-acceptance information, site management will confirm if the permit allows it and if it can be handled appropriately. Otherwise, the waste will be rejected.

3.2.3 The waste acceptance procedures will follow a risk-based approach in accordance with Section 3.2 of Appropriate Measures, considering:-

- The source, nature, and age of the waste;

- Potential risks to process safety, occupational safety, and the environment (e.g. from odour and other emissions);
- The potential for self-heating; and
- Knowledge of the previous waste holder(s).

3.2.4 The suitably trained nominated person will check that the relevant storage areas and treatment processes have the physical capacity to handle the waste. The site will not accept the waste if the capacity is not available, or if it would breach the permit to do so.

3.2.5 The waste will be visually checked and verified against pre-acceptance information prior to acceptance onto site. The extent of the visual check is based on the waste type and how it is packaged.

3.2.6 Clear criteria will be used to identify non-conforming wastes and wastes to be rejected. In the event that these wastes arrive on site, the written procedures for recording, reporting, and tracking non-confirming and rejected wastes will be utilised which include:-

- Using quarantine storage;
- Notifying the relevant customer or waste producer; and,
- Recording a summary of your justification for accepting non-confirming waste in your electronic (or equivalent) system.

3.2.7 The member of staff undertaking waste acceptance checks will be trained to effectively identify and manage any non-conformances in the loads received in order to comply with the Duty of Care and permit conditions.

3.2.8 Each load of waste will be weighed on arrival using the weighbridge located outside the permitted area to confirm quantities against the accompanying paperwork which will be recorded in Benfleet's comprehensive recording system. The suitably trained nominated person shall then notify the driver to proceed to the relevant area on site.

3.2.9 Materials will be tipped directly into the stockpiles or deposited on the hardcore surface in front of the stockpiles, where mobile plant will be operated to move the material into the stockpiles.

## 3.3 Waste Rejection

3.3.1 All waste rejection procedures will be undertaken in accordance with Section 3.2 and 3.3 of the Appropriate Measures.

3.3.2 Any non-conforming loads will either be rejected from the site and redirected to an appropriate permitted facility at the responsibility of the third-party senders or placed in quarantine prior to removal from site. A record will be made in the Site Diary and comprehensive recording system.

3.3.3 Any non-conforming waste identified following tipping will either be reloaded into the delivering vehicle and rejected from the site or placed in quarantine prior to removal from site.

3.3.4 The quarantine area on site is indicatively on Drawing 3376-002-03 and is separate from all other storage areas. Quarantined waste will be sheeted to prevent rainfall or wind from mobilising pollutants.

3.3.5 Quarantined wastes shall be removed from the site as soon as practicable. If the quarantine waste is infested or odorous, the waste will be removed within 24 hours or less. However, due to the nature of the waste accepted on site, it is not considered that infested or odorous waste will become an issue.

3.3.6 Whenever site specific acceptance criteria detailed in the contract agreed as stated in Section 3.1.4 are not met, this will be clearly communicated to the waste supplier and records of the communication shall be kept.

3.3.7 The site may cease accepting loads from a particular supplier if contamination has occurred repeatedly and the supplier has not attempted corrective action or, in the composter's opinion, the action taken has been ineffective.

## 3.4 Waste Tracking

3.4.1 All waste tracking procedures will be undertaken in accordance with Section 3.4 of Appropriate Measures.

3.4.2 Benfleet's comprehensive recording system will be used to hold up-to-date information about the available capacity of different parts of the facility e.g., reception, quarantine, treatment, and storage areas. Benfleet's system will ensure that the site has enough waste storage and process capacity for the incoming acceptable waste.

3.4.3 Benfleet's comprehensive recording system holds all information generated during:-

- Pre-acceptance;
- Acceptance;
- Non-conforming or rejection;
- Storage;

- Repackaging;
- Treatment; and,
- Removal off site.

3.4.4 Records will be created and updated to reflect deliveries, onsite treatment, and despatches. The recording system will operate as a waste inventory and stock control system, including both wastes and end-of-waste materials produced at your facility. This will include the following:-

- The date the waste arrived on site;
- The original producer's details;
- A unique reference number;
- Waste pre-acceptance and acceptance information;
- The package type and size;
- The intended treatment or disposal route;
- The nature and quantity of wastes held on site;
- Where the waste is physically located on site;
- Where the waste is in the designated recovery or disposal process;
- Identifying the staff who have taken any decisions about attempting or rejecting waste streams and who have decided on recovery or disposal options;
- Details that link waste to relevant transfer notes; and
- Details of any non-conformances and rejections, including consignment notes for waste rejected because it is hazardous.

3.4.5 Benfleet's comprehensive recording system will report for each LoW code: -

- The total quantity of waste present on site at any one time;
- A breakdown of the waste quantities stored pending onsite treatment or awaiting onward transfer;
- Where a batch of waste is located based on a site plan;
- The quantity of waste on site compared with the limits in the management system and permit; and

- The length of time the waste has been on site compared with the limits in the management system and permit.

3.4.6 The system will also report the total quantity of end-of-waste materials on site at any one time, and where the material is located on Drawing 3376-002-03.

3.4.7 Acceptance records will be kept for a minimum of 2 years after the waste has been treated or removed off site.

# 4.0 Storage Activities

4.0.1 All storage activities will be undertaken in accordance with Section 4 of the Appropriate Measures.

## 4.1 Storage Capacity

Physical Treatment Facility

4.1.1 As per the existing Standard Rules Permit SR2015 No 6 (EPR/MP3325SU, treatment within the physical treatment facility will consist only of sorting, separation, screening, crushing, and blending of waste for recovery as a soil, soil substitute, or aggregate.

4.1.2 These activities will occur in the existing permitted area and the proposed extended permitted area to the west and south.

4.1.3 Vehicles will be directed to discharge their loads by the designated operative. The suitably trained nominated members of staff will have a clearly defined role to ensure that vehicles are directed to the correct area of the site.

Storage for the Activities

4.1.4 There will be a maximum storage capacity of 50,000 tonnes for both untreated and treated materials.

## 4.2 Storage and Waste Handling Procedures

4.2.1 All storage and waste handling on site will be undertaken in accordance with Section 4 of the Appropriate Measures.

4.2.2 Waste on site will be stored and handled in a way that ensures prevention and minimisation of pollution risks.

4.2.3 The handling of waste will be minimised due to the efficient location of the waste storage areas and waste treatment areas on site. The indicative location of these areas is shown on Drawing Number 3376-002-03.

4.2.4 Waste handling will be undertaken by competent staff with the assistance of mobile plant. All waste storage areas are located securely within the security protected area of the facility to restrict unauthorised access and vandalism.

4.2.5 All waste accepted on site comprises of non-hazardous soils, and therefore the first-in-first-out (FIFO) procedure does not need to be followed.

4.2.6 Storage areas, containers and infrastructure will be inspected daily to ensure there is no loss of containment. Written records of all inspections will be kept, and any spillages of waste will also be logged. Due to the nature of the waste accepted on site, segregation procedures do not apply.

# 5.0 Waste Treatment

Physical Treatment Facility

5.1.1 Under the current environmental permit Benfleet operate a Physical Treatment Facility at the site. It is the intention of Benfleet to retain this activity on site under the varied permit and the annual tonnage will be 200,000 tonnes.

5.1.2 Vehicles delivering waste loads will enter the site via the weighbridge, where the waste acceptance procedures mentioned above will be undertaken. If the waste is deemed acceptable, the driver will be directed to the waste treatment area as shown on the indicative Site Layout Plan (Drawing Number 3376-002-03).

5.1.3 Waste will only be handled by competent staff.

5.1.4 A variety of waste treatment methods will be applied on site which is subject to the nature of the waste. Depending on the particle size of the material, a crusher may be employed to crush the waste and processed via a screener a second time to reduce the particle size of the material. Alternatively, wastes that originally comprise finer particles will not require crushing and therefore will only be processed via a screener.

5.1.5 Following treatment, the waste will be unloaded into clearly defined stockpiles located adjacent the waste treatment area. Processed materials will be stored on the existing site hardstanding.

5.1.6 This activity will take place in the existing permit boundary.

5.1.7 Products produced will be in accordance with the relevant End of Waste Protocol. The resultant materials will be tested in accordance with the WRAP Quality Protocol in order to determine whether they have met end of life test and as such cease to be classified as waste. These materials will be stored on hardstanding.

5.1.8 The results of the testing will determine the destination of the material in accordance with the End of Waste Protocol.

5.1.9 The stockpile will remain on site until such time as sufficient volume is acquired for it to be removed from site to the receiving site and in any case no longer than the period identified within the Environmental Permit.

5.1.10 All treatment activities will be undertaken in accordance with Section 5 of the Appropriate Measures. The site will have accurate and up-to-date written details of the treatment and abatement and control equipment utilised. Information about the characteristics of the waste to be treated and the waste treatment processes include:-

- Simplified process flow sheets that show the origin of the emissions;
- Diagrams of the main plant items where they have environmental relevance, for example, storage, tanks, treatment and abatement plant design;
- Details of physical processes e.g. separation, compaction, shredding;
- An equipment inventory, detailing in plant type and design parameters;
- Waste types to be subjected to the process;
- The control system philosophy and how the control system incorporates environmental monitoring information;
- Process flow diagrams (Provided within Appendix C of the Operating Techniques);
- The hourly processing capability of waste treatment equipment; and
- Summary of operating and maintenance procedures.

5.1.11 Benfleet will maintain details of the measures to be taken during abnormal operating conditions to make sure they continue to comply with permit conditions. Abnormal operating conditions include the following:-

- Unexpected releases;
- Start-up;
- Momentary stoppages; and
- Shutdown.

# 6.0 Emissions Control

6.0.1 All emissions control procedures will be undertaken in accordance with Section 6 of the Appropriate Measures.

## 6.1 Point Source Emissions to Air

6.1.1 In accordance with Section 6.2 of the Appropriate Measures, the site will characterise the emissions to air sufficiently to ensure the chosen abatement systems are effective.

6.1.2 To reduce point source emissions to air for dust compounds, an appropriate combination of abatement techniques will be in place. The dust abatement equipment on site includes tractor bowser and fixed-point dust suppression.

6.1.3 Measures will be implemented on site to further prevent the risk of a potential adverse impact on sensitive receptors. Such measures are provided in the following management plans:-

- Environmental Risk Assessment (Appendix C of the Environmental Permit Application);
- Dust Management Plan (Appendix D of the Environmental Permit Application); and
- Noise Management Plan (Appendix E of the Environmental Permit Application).

## 6.2 Fugitive Emissions to Air (including Odour)

6.2.1 In accordance with Section 6.3 of the Appropriate Measures, fugitive emissions to air, including dust, mud, litter, odour and noise and vibration will be prevented and minimised.

6.2.2 Fugitive emissions to air have been identified as a potential environmental risk resulting from the proposal, as detailed in the Environmental Risk Assessment that accompanies this application as Appendix C.

6.2.3 An appropriate maintenance programme will be in place to cover all plant, and equipment.

6.2.4 Weather conditions will be logged, including temperature, wind speed and direction, and description of any precipitation to identify when dispersion conditions are poor.

6.2.5 Measures will be implemented on site to further prevent the risk of a potential adverse impact on sensitive receptors. Such measures are provided in the following management plans:-

- Dust Management Plan (Appendix D of the Environmental Permit Application);

- Environmental Risk Assessment (Appendix C of the Environmental Permit Application); and
- Noise Management Plan (Appendix E of the Environmental Permit Application).

6.2.6 It is anticipated that, due to the nature of the waste accepted on site, the risk of odour is minimal. Therefore, an Odour Management Plan has not been prepared as part of this application.

## 6.3 Pests

6.3.1 Due to the nature of wastes accepted on site, the risk of pests is minimal.

6.3.2 In accordance with Section 6.6 of the Appropriate Measures, pests have been identified as a potential environmental risk resulting from the proposal, as detailed in the Environmental Risk Assessment that accompanies this application as Appendix C.

## 6.4 Noise and Vibration

6.4.1 In accordance with Section 6.3 of the Appropriate Measures, a Noise Management Plan (NMP) have been prepared to identify the potential risk of an adverse impact regarding noise from the proposed activities, and to describe the measures that will be in place to minimise the risk of noise. The NMP are provided as Appendix E of the Environmental Permit application.

## 6.5 Fugitive Emissions to Land and Water

6.5.1 Fugitive emissions to land and water have been identified as a potential environmental risk resulting from the proposal, as detailed in the Environmental Risk Assessment that accompanies this application as Appendix C.

# 7.0 Process Efficiency

## 7.1 Energy Efficiency

7.1 This Environmental Permit Variation Application does not include proposals for an installation, therefore Section 8 of the Appropriate Measures does not apply.

7.2 The energy requirements of the facility are very low and are mainly associated with outdoor lighting within the permitted area.

7.3 In line with the Environmental Management System (EMS), basic energy saving measures are adopted and continually reviewed. This includes measures such as:-

- Efficient use of plant to avoid unnecessary ignition;
- Plant to be switched off when not in use; and
- Regular maintenance of all plant.

## 7.2 Waste Minimisation, Recovery and Disposal

7.2.1 It is crucial to note that the site outputs comprise of product only.

7.2.2 As required under the Environmental Permit, Benfleet will have a programme of waste minimisation audits to ensure that an audit is carried out at least once every 4 years. Audits will include the following:-

- Methodology used;
- Analysis of raw materials used;
- Assessment of opportunities for reduction; and
- An action plan for improvements.

7.2.3 The audit will be submitted to the EA within 2 months of completion.

7.2.4 Data will be incorporated for each principal stage of the operation, which will enable the calculation of the actual mass balance of the operation. This will then be used to assess opportunities to improve efficiency and reduce waste production. Benfleet adopts the waste hierarchy to reach the requirement of waste minimisation.

# 8.0 Accident Management

8.1.1 All necessary measures will be taken to prevent the occurrence of accidents. The types of accidents and the potential environmental consequences associated with them have been identified in the Environmental Risk Assessment that accompanies this application.

8.1.2 It is considered that the most significant risk associated with the site is the unauthorised acceptance of non-compliant waste types. The waste acceptance procedures listed in Section 3 of this document aim to control and minimise this risk.

## 8.2 Fire Control

8.2.1 Due to the non-combustible nature of the waste accepted at the site, a Fire Prevention Plan is not required to support the application.

8.2.2 Firefighting equipment of a suitable type shall be kept at appropriate locations as advised by the Health and Safety Manager or the local Fire Service. All firefighting equipment shall be kept in good condition, unobstructed and be serviced by a competent person. The site will be designated as a “no smoking area” and signed accordingly.

8.2.3 Any fire on the site will be treated as an emergency and will be extinguished at the earliest opportunity. If necessary, the Fire Service will be summoned. Any incidents of fire will be reported to the EA and recorded in the Site Diary.

8.2.4 The potential risk of fire is minimal and is addressed, with mitigation measure provided, within the Environmental Risk Assessment that accompanies this application as Appendix C.

## 8.3 Maintenance Procedures

8.3.1 A Planned Preventative Maintenance programme (PPM) will be put in place to minimise the risk to safety, health, and the environment by ensuring that all appropriate items and elements within the site are serviced and inspected on a regular basis or to the manufacturers’ maintenance schedules.

8.3.2 Details of faults, breakdowns and repairs are documented, and records are maintained at the site office. Faults and breakdowns will be investigated, and the service schedule revised if necessary.

## 8.4 Spillage Procedure

8.4.1 There will be no waste oils accepted on site.

8.4.2 The most likely source for spillages will be from spillages of fuel/oil associated with site plant or vehicles.

8.4.3 In the event of a spillage of fuel/oil from site plant or vehicles, the following procedures will be implemented:-

- Clear the area straight away;
- Lay absorbent granules over the spill to soak up the spillage;
- Use Personal Protective Equipment (PPE) provided on site if required;
- Once the liquid has all been absorbed use a shovel to clear up the waste, put it in a plastic sack and then place it in the container for non-compliant waste for disposal at a suitably permitted facility; and
- A record of the spill incident and remedial action taken will be recorded in the Site Diary.

8.4.4 Spillage kits will be maintained on site in order to respond to any spillage incident. The spillage kits will be stored strategically around the site to ensure their availability.

# 9.0 Site Management

## 9.1 Technical Competence

9.1.1 The nominated person possesses the required level of technical competence which is provided as part of Appendix A of the Environmental Permit Variation Application.

9.1.2 All site operatives will be adequately trained in health, safety, and environmental issues. Staff will only be permitted to undertake activities that they have been trained for. They will be made aware of the procedures they must follow in the event of an accident or incident and will be able to access any relevant documentation that they may require. All training, experience and qualifications of staff will be noted, and these records will be maintained and kept up to date.

9.1.3 Staff competence will be managed in accordance with the Staff Competency and Training Plan that forms part of the site's management system.

## 9.2 Environmental Management System

9.2.1 As noted in the EA's 'Develop a Management System: Environmental Permits' guidance, all permitted facilities are required to have an Environmental Management System (EMS) to describe the procedures in place to minimise the risk of pollution from the activities covered in the environmental permit.

9.2.2 Benfleet has a certified Environmental Management System in place which is compliant with the requirements of ISO 14001. The operator may update their EMS procedures from time to time to reflect working practice which would take precedent over the details contained herein.

9.2.3 All site operatives would be adequately trained in health, safety, and environmental issues. Staff would only be permitted to undertake activities that they have been trained for. They would be made aware of the procedures they must follow in the event of an accident or incident and would be able to access any relevant documentation that they may require. All training, experience and qualifications of staff would be noted, and these records would be maintained and kept up to date.

# 10.0 Management of Documentation

## 10.1 Record Keeping

10.1.1 Benfleet have an EMS which includes procedures for the management of documentation.

10.1.2 A record will be kept that provides details on all waste inputs at the site. This will include details on waste types, quantities, and the origin. This will be provided to the EA at three-monthly intervals, within one month of the end of each period. A record of basic waste characterisation and any compliance testing or on-site verification will be maintained in the site office.

10.1.3 A site diary style recording system will be kept in the site office at all times, and this will be updated daily. The diary will be used to record any accidents, incidents, or complaints. This will provide an ongoing record throughout the period of operation at the site, and this will enable any investigative or corrective action that may be required.

10.1.4 The Environmental Permit and other documents containing information regarding the operation of the site will be kept in a convenient location, allowing access for any person that may be working at or visiting the site.

# 11.0 Incident and non-conformances

11.1 Benfleet have procedures for investigating and recording any incidents and non-conformances at the site, and for taking any corrective action n. Benfleet have an EMS which this includes procedures for handling incidents and non-conformances.

11.2 The following types of incidents will require investigation:-

- Malfunction, breakdown or failure of plant and equipment;
- Deviation from site procedures and operating techniques;
- Near misses; and
- Complaints from external parties.

11.3 All staff will be trained to detect and report any such occurrences. Procedures will be taken to allow operations to resume and preventative measures may be put in place to ensure that the incident does not reoccur.

# Drawings

3376-002-03 – Site Layout Plan

# Appendix A - Waste Types

**Table A1: Proposed Waste Types**

| EWC Code | Description |
|---|---|
| **01** | **WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS** |
| **01 04** | **Wastes from physical and chemical processing of non-metalliferous minerals** |
| 01 04 08 | Waste gravel and crushed rocks other than those mentioned in 01 04 07 |
| 01 04 09 | Sand and clays |
| **02** | **WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING** |
| **02 01** | **Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing** |
| 02 01 01 | Soil from cleaning and washing vegetables |
| **02 02** | **Wastes from the preparation and processing of meat, fish and other foods of animal origin** |
| 02 02 02 | Shellfish shells from which the soft tissue or flesh has been removed |
| **02 03** | **Wastes from fruit, vegetables, cereals, edible oils, cocoa, coffee, tea and tobacco preparation and processing; conserve production; yeast and yeast extract production, molasses preparation and fermentation** |
| 02 03 01 | Soil from cleaning and washing vegetables |
| **02 04** | **Wastes from sugar processing** |
| 02 04 01 | Soil from cleaning and washing beet |
| **10** | **WASTES FROM THERMAL PROCESSES** |
| **10 01** | **Wastes from power stations and other combustion plants (except 19)** |
| 10 01 05 | Gypsum (solid) |
| 10 01 07 | Gypsum (sludge) |
| **10 02** | Wastes from the iron and steel industry |
| **10 11** | **Waste from manufacture of glass and glass products** |
| 10 11 12 | Clean glass other than those mentioned in 10 11 11 |
| **10 12** | **Wastes from manufacture of ceramic goods, bricks, tiles and construction products** |
| 10 12 08 | Ceramics, bricks, tiles and construction products (after thermal processes) |
| **10 13** | **Wastes from manufacture of cement, lime and plaster and articles and products made from them** |
| 10 13 14 | Concrete |
| **15** | **WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED** |
| **15 01** | **Packaging (including separately collected municipal waste packaging)** |
| 15 01 07 | Clean glass |
| **17** | **CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)** |
| **17 01** | **Concrete, bricks, tiles and ceramics** |
| 17 01 01 | Concrete |
| 17 01 02 | Bricks |
| 17 01 03 | Tiles and ceramics |

| | |
|---|---|
| 17 01 07 | Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06 |
| **17 02** | **Wood, glass and plastic** |
| 17 02 02 | Clean glass |
| **17 03** | **Bituminous mixtures, coal tar and tarred products** |
| 17 03 02 | Road base and road planings (other than those containing tar) |
| **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 including stone filter media free from sewage contamination |
| 17 05 06 | Dredging spoil other than those mentioned in 17 05 05 (sand and aggregate only) |
| 17 05 08 | Track ballast other than those mentioned in 17 05 07 |
| **17 08** | **Gypsum-based construction material** |
| 17 08 02 | Gypsum other than that mentioned in 17 08 01 |
| **17 09** | **Other construction and demolition wastes** |
| 17 09 04 | Mixtures of soil, bricks, stones and concrete |
| **19** | **WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE** |
| **19 08** | **Wastes from waste water treatment plants not otherwise specified** |
| 19 08 02 | Washed sewage grit (waste from desanding) free from sewage contamination |
| **19 12** | **Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified** |
| 19 12 05 | Glass free from contamination |
| 19 12 09 | Minerals (for example sand, stones) |
| 19 12 12 | Other Waste (including mixtures of waste) from mechanical treatment of waste other than those mentioned in 19 12 11 |
| **19 13** | **Wastes from soil and groundwater remediation** |
| 19 13 02 | Solid wastes from soil remediation other than those mentioned in 19 13 01 |
| **20** | **MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS** |
| **20 01** | **Separately collected fractions (except 15 01)** |
| 20 01 02 | Glass free from contamination |
| **20 02** | **Garden and park wastes (including cemetery waste)** |
| 20 02 02 | Soil and stones |

# Appendix B – Process Flow Diagrams

Physical Treatment Process Flow Diagram.