



## **ENVIRONMENTAL MANAGEMENT SYSTEM**

***WASTE TRANSFER STATION***

***DEPOT HIRE LTD***

***RAMPARTS INDUSTRIAL ESTATE***

***BERWICK UPON TWEED***

***TD15 1TQ***



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## 1.0 Site Introduction

This Management System has been prepared to identify and minimise the risk of pollution, including those arising from operations, maintenance, accidents, incidents, nonconformances, closure and those drawn to the attention of the operator/site management as a result of complaints; and carried out under the environmental permit issued to the company.

**Operator:** Mr Frank Flannigan

**Facility:** Depothire Ltd

Operated and permitted at: Ramparts Industrial Estate, Berwick upon Tweed, TD15 1TQ

**Permit reference:** TBC

**Waste returns reference:** TBC

The company operate a Waste Transfer Facility accepting wastes primarily arising from industrial, commercial and household wastes.

### 1.1 Site Location

The site lies within an industrial estate, bounded by commercial business and coastal features. The nearest residential properties are located approximately 350m from the site.

### 1.2 Site Permit

The permit will allow the site to carry out activities under a Bespoke Environmental Permit as a Commercial, Household and Industrial Waste Transfer Station.

### 1.3 Drawings

TBC

### 1.4 Site Activities

Waste management activities are listed within the permit.

The following activities are authorised on site;

- D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)
- R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)
- D14: Repackaging prior to submission to any of the operations numbered D1 to 13
- D9: Physico-chemical treatment not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12
- R3: Recycling/reclamation of organic substances which are not used as solvents
- R4: Recycling/reclamation of metals and metal compounds R5: Recycling/reclamation of other inorganic materials

- R5:

In undertaking these activities, the site is limited to.

- Treatment consisting only of manual sorting or manual separation of waste into different components for disposal, (no more than 50 tonnes per day) or recovery.
- No more than a total of 50 tonnes of intact and shredded waste vehicle tyres (waste codes 16 01 03 and 19 12 04) shall be stored at the site

Wastes are accepted inside the transfer building, then sorted and segregated manually into separate fractions. Wastes will be stored once segregated by hand either internally (wood, cardboard, plasterboard for example) or plastic, metals, aggregates and soils. Plant machinery is used to load materials into containers/skips or into stockpiles.

The different grades of waste will mainly consist of:

- Paper
- Cardboard
- Wood
- Plastic
- Soil
- Stone/Rubble
- Scrap metal

## 1.5 Permitted Wastes

The site will accept waste listed in the permit.

Wastes are accepted inside the transfer building, then sorted and segregated manually into separate fractions. Wastes will be stored once segregated by hand either internally (wood, cardboard, plasterboard for example) or plastic, metals, aggregates and soils. Plant machinery is used to load materials into containers/skips or into stockpiles.

## 1.6 Site Layout and Drainage

The Site Layout Plan demonstrates the infrastructure and waste storage and treatment areas on site.

All site surfaces are impermeable, made up of concrete.

## 1.7 Hours of Operation

The site operates:

Monday – Friday 08.00 – 17.00

Saturday – 09.00 -12.00

Sunday – closed

Christmas day – closed

New Year's Day – closed

All Waste Operation will be carried out within these hours

All Other Public Bank Holidays will be treated as Normal Working Days

## 1.8 Site Notice Board

A notice board is erected at the site entrance, displaying the following information:

- The site name and address;
- The name of the permit holder and operator;
- The Environmental Permit number and accompanying statement stating that the site is permitted by the Environment Agency.;
- Environment Agency contact details, Emergency No. 0800 80 70 60 and General Enquires No. 03708 506 506;
- Operator's "out of hours" emergency contact;
- Operating hours.

Additional signs are displayed around the site for operational and health & safety purposes. All staff and visitors will be required to comply with the requirements of all signs whilst on site.

## 1.9 Staff and Site Management

The table below details the number of staff when the site is open for the reception and processing of waste.

Position	Employees	Responsibilities
Site Manager/Supervisor	X 1	Ensuring the site is being operated in accordance with Environmental Permit
Site operatives	X 1	Waste handling/processing, reception and plant operation
TCM	X1	Ensuring the site is being operated in accordance with Environmental Permit

## 1.10 Staff Training

Staff and temporary staff employed will receive appropriate training to enable them to carry out their role safely and effectively, also to allow the site to be operated within the current legislation and guidelines and also to ensure company procedures are followed.

Records of training will be kept and updated accordingly.

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.

Mr Frank Flannigan is the Technically Qualified Manager on site. Competency is maintained by undertaking a continuing competency test every two years.



## 1.11 Document Control

This document is considered to be a 'working' document that will be reviewed and updated annually (if required) or as required should any of the following occur:

- the results of any testing of this document indicate that changes are required;
- a change or review of legislation;
- a change in site operations; or
- if the site is instructed to do so by the EA.

## 1.12 Reporting

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.

## 1.13 Notifications

The Environment Agency shall be notified without delay following the detection of:

- (a) any malfunction, breakdown or failure of equipment or techniques, accident or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution;
- (b) the breach of a limit specified in these standard rules; or
- (c) any significant adverse environmental effects.

Written confirmation of actual or potential pollution incidents and breaches of emission limits shall be submitted within 24 hours.

Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.

## 2.0 Site and Emergency Contacts

ORGANISATION / PERSON	CONTACT TELEPHONE NUMBER
<b>FIRE EMERGENCY</b>	<b>999</b>
<b>FIRE LOCAL</b>	<b>During office hours:</b>  Office hours are Monday to Thursday, 8.30am to 5pm, and 8.30am to 4.30pm Friday.  Telephone: 01670 621111  Email: <a href="mailto:FireReception@northumberland.gov.uk">FireReception@northumberland.gov.uk</a>  <b>Outside of office hours:</b>  Telephone: 01670 627599  Email: <a href="mailto:Fcontrol@northumberland.gov.uk">Fcontrol@northumberland.gov.uk</a>
<b>POLICE EMERGENCY</b>	<b>999</b>
<b>ENVIRONMENT AGENCY – Incident Hotline</b>	<b>0800 80 70 60</b>
<b>HSE</b>	<b>0345 300 9923</b>
<b>NORTHUMBRIAN WATER</b>	<b>0345 717 1100</b>
<b>NORTHERN POWER GRID</b>	<b>0800 66 88 77</b>
SITE CONTACT	CONTACT TELEPHONE NUMBER
Operator <b>Mr Frank Flannigan</b>	<b>07768 002200</b>

## 3.0 Standard Operating Procedures

### 3.1 Emergency Procedures

An emergency is considered to be an event or incident that has, or has the potential to, cause immediate harm to the environment, employees, neighbours, on site property, neighbouring property, and/or result in a legal non-compliance that puts the company and its business at risk.

#### 3.1.1 Fire

Any outbreak of fire at the site shall be treated as an emergency. In the event of fire, the following action will be taken:

- The fire brigade will be notified immediately, and the EA as soon as practicable;
- The burning area will be isolated and attempts will be made to extinguish the fire utilising the on-site fire extinguishers, if safe to do so;
- Contaminated site runoff will be isolated and prevented from entering any unsurfaced ground; and
- The site will be evacuated if the fire is not containable.

The area of fire must be evacuated without generating panic. Site personnel must ensure that no persons or vehicles re-enter the affected area. The emergency meeting point is opposite the site entrance.

#### 3.1.2 Flooding

The site is not located in a designated flood zone.

#### 3.1.3 Severe accident or fatality

In the event of a severe accident or fatality, the ambulance service should be contacted immediately.

The site's designated first aider will employ emergency first aid as appropriate.

Where an accident results in a casualty requiring an individual to be taken to hospital, the Health and Safety Executive (HSE) will be notified as soon as practicable.

#### 3.1.4 Major spillage

In the event of a major spillage which has the potential to cause pollution or off-site contamination, the Operator/Site Management will immediately contact the EA via the incident hotline (**0800 80 70 60**) and the emergency services. Any staff or visitors will follow instructions and take appropriate actions taking into consideration the risks associated with the spilt substance.

If appropriate and safe to do so, action will be taken to prevent the transmission of the substance(s).

#### 3.1.5 Communication

In the event of an emergency, the occupants of neighbouring properties will be contacted and advised of the incident, its severity and contingency arrangements that may include evacuation.

In all cases after an event, an **Accident and Incident Record** (5) is completed. An investigation may be carried out by the Operator/Site management or other designated person. The incident will be reported to the relevant authorities including:

- Environment Agency
- Health & Safety Executive
- Northumbrian Water

### **3.1.6 Training**

Suitable and sufficient training and information shall be provided to all relevant employees in order that they are aware of their duties in an emergency situation. Such training shall be recorded and updated as required on either electronic or physical records held in the site office.

### **3.1.7 Testing and Reporting**

Records shall be kept of maintenance and testing of safety equipment.

Evacuation drills and mock spill incidents and accidents shall be staged at six monthly intervals. The Operator/Site Management shall maintain a record of these.

## **3.2 Waste Acceptance**

The following procedures outline the pre-acceptance and acceptance measures that will be followed at all times.

Waste shall only be accepted.

- (a) it is of a type listed within the permit;
- (b) it conforms to the description in the documentation supplied by the producer and holder;
- (c) it is visually inspected on arrival and before it enters the treatment process to ensure that it complies with the permit.

### **3.2.1 Pre-acceptance procedures to assess waste**

Waste materials brought to site by both company vehicles and 3<sup>rd</sup> parties so a waste carriers check is required.

Pre acceptance is carried out by the company when initially booking in incoming loads.

The customer will be informed of the site acceptance rules including the list of non-permitted wastes (such as asbestos/electrical wastes).

In the event of third parties are delivering or removing waste from the site, the site manager/TCM will undertake a check of the relevant waste carrier's licence in place by verifying the waste carriers licence document.

Should there be the need to conduct further verification the licence can be checked to ensure that the vehicle is properly licensed by using one of the following methods:

- Contacting the Environment Agency on 08708 506 506 to request an instant Waste Carrier Validation Check; or
- Online on the Environment Agency's waste carrier register at: <http://www.environment-agency.gov.uk/epr/search.asp?type=register>.

If vehicles are arriving from the same company/under same contract the Waste Carrier Licence may cover all vehicles.

### 3.2.2 Waste Transfer Note

All deliveries to site are pre booked due to the nature of the business and in relation to capacity on site. A transfer note accompanies all incoming loads to site.

In the event of third parties delivering waste to site a transfer note is required to accompany incoming wastes.

Waste will be described in the waste transfer note with reference to the European Waste Catalogue (EWC) Codes with the appropriate code number. A copy of the list of wastes that can be accepted on site can be found in the site's environmental permit. The Site Manager and site operatives will be trained to identify a correctly completed waste transfer note.

Upon the receipt will check that the waste transfer note includes signed confirmations that the waste hierarchy has been applied correctly under the Environmental Permitting (England and Wales) Regulations 2010 (as amended). The waste hierarchy illustrates the most and least favoured options of disposal (1 being the most favoured):

1. Prevention;
2. Minimisation;
3. Reuse;
4. Recycling;
5. Recovery/energy recovery; and
6. Disposal.

The waste transfer note will record the below information:

- a description of the waste
- any processes the waste has been through
- how the waste is contained or packaged
- the quantity of the waste
- the place and date, time of transfer
- the name and address of both parties
- details of the permit, licence or exemption of the site receiving the waste
- the licence or registration number of the person handing over the waste, any waste management licence and registered carrier details
- the appropriate European Waste Catalogue (EWC) code of the waste
- the Standard Industry Code (SIC)

All waste transfer notes will be kept for the lifetime of the permit.

### 3.2.3 Waste Acceptance Procedure

The following steps will be followed for all incoming wastes from customers. The Site Manager/TCM and any site operatives will be trained to understand and implement the following waste acceptance procedures:

All waste we receive must come under the heading of non-hazardous waste. No special waste or liquid is permitted our staff are trained to inform customers of what waste is acceptable and what is not. Our drivers carry out visual checks of the skips upon collection any waste deemed inappropriate will be rejected. The driver will fill out a rejection form.

- The site will weigh and record the weights of wastes;

- Waste will arrive on site with the relevant paperwork (waste transfer note and any sampling schedules/results) for initial checks. Any discrepancies will be resolved before the waste is officially accepted on-site. The Site Manager will ensure that no non-conforming waste is accepted for processing.
- Upon arrival on site the load will be further inspected and validated against the waste transfer note. One copy will be held on-site and if an external customer the other given to the driver of the vehicle.
- A visual inspection will be taken to ensure consistency with the waste transfer note.
- Checks on storage capacity are made daily to ensure that suitable space is available for any incoming wastes.
- Wastes will be tipped in the specific tipping area, the waste will be subject to visual inspection by site staff. In the event that any non-permitted waste is observed, it will be removed and moved to the quarantine area.

If the load is rejected, the waste transfer note will be completed with the reason for rejection, and the vehicle directed off site/or waste reloaded and taken back to the producer or to a suitably permitted facility.

### **3.2.4 Non-compliant waste**

If waste is found to be non-compliant prior to being unloaded, the details will be recorded, and the vehicle/waste turned away. Should wastes be found to be non-compliant following receipt onto site, then the waste will be:

- reloaded on to the delivery vehicle for transport off-site to a suitably permitted facility; or
- removed to a designated quarantine skip/area, pending removal off-site to the producer or to a suitably permitted facility.

All records of non-compliant waste received at the site will include the following details:

- the quantity;
- reason for non compliance;
- characteristics;
- origin;
- photographs;
- delivery date and time; and
- the identity of the producer and carrier.

This record will be made in the site diary and the EA informed if significant loads are received in error.

## **3.3 Non-Conforming Waste Procedure**

If waste is found to be non-conforming, the following procedure is to be followed;

1. Notify the relevant EA officer(s) of significant loads as soon as is practicable;
2. If the carrier's vehicle is still present, the waste should, wherever possible, be reloaded back onto the carrier's vehicle/ or refused and returned to the member of the public;
3. If the material is reloaded onto the carrier's vehicle: the office of the carrier should be notified by telephone; the details including time of call and contact name are to be recorded in the Site Diary (or other recording system); and a copy of the Waste Rejection Record is to be retained;
4. If the carrier or customer has departed the site, and if it is considered safe to do so, the waste is to be photographed where possible, placed in a quarantine area pending the outcome of further investigations;

5. If the waste is of unknown composition, it is to be isolated at the operational area pending further investigations. This is to be achieved by the placement of cones or other barriers around the waste;
6. Further investigations may include contact with the carrier/customer and the producer to seek to determine the likely composition of the waste. These investigations are to be undertaken by the Site Manager or other designated person;
7. If the waste is confirmed as not being permitted for recovery at the site, the waste is to be directed to an alternative, suitably licensed facility; and
8. Wherever possible, rejected waste is to be removed from the site within 24 hours of receipt at the site; however, identification of suitable disposal facilities may result in the waste being stored for a longer period prior to removal from the facility (e.g. contaminated soils/WEEE)

### **3.3.1 Waste Rejection Note**

The Waste Rejection Record is to be completed and cross referenced in the Site Diary. It should include the following details:

- Date and time;
- Producer/Customer details;
- Carrier/Customer details;
- Transfer note reference number;
- Description of waste;
- Volume of waste;
- Photographs of the waste;
- European Waste Catalogue (EWC) code;
- Non-conforming waste; and
- Actions agreed and taken.

## **3.4 Incoming Waste and Waste Storage**

The permitted annual throughput is 75,000 tonnes.

Storage areas are to be regularly inspected and maintained, including site surfacing and stockpile management.

Daily visual inspections will ensure that:

Unless stored or treated outside as specified waste:

- a) all bulking, transfer or treatment of waste shall be carried out inside a building;
- b) all waste shall be stored in a building or within a secure container.
- c) all waste shall be stored and treated on an impermeable surface with sealed drainage system.

Specified waste (soils, stones etc) shall be tipped, inspected and stored externally, treated on hard standing or on an impermeable surface with sealed drainage system.

Wastes are stored and segregated in designated stockpiles and containers.

Site capacity will be managed on a daily basis.

Waste will be stored in line with the site layout plan, the site layout plan designates all storage areas.

Should storage areas on site reach capacity, no further waste shall be accepted, and waste will be diverted to a suitably permitted facility.

### **3.5 Waste Treatment**

The permit allows manual treatment only, of incoming wastes.

Incoming wastes post acceptance may be subject to manual treatment with the removal of any low level contaminants within source segregated loads (plastic/wood/metals). These contaminants will be stored in a stockpile or container for disposal off site or further recovery.

Paper and cardboard is separated out and transported to a recycling facility. Wood is sorted and separated and placed into a segregated area of the yard and or inside the sorting shed. Roll on Roll off skips which are supplied to us by McKenzie Recycling Centre in Edinburgh are then filled up and collected approximately twice per week.

Scrap metal will be extracted from the skips as well as brought in from customers. It is sorted into the various types of metal and placed inside skips to be transported to European Metal Recycling in Blaydon Newcastle upon Tyne.

Wastes are then subject to mechanical lifting to move wastes into the appropriate storage area.

Soil is tipped inside the unit and segregated into its own area. It is then transported to Viridor Landfill Site in Dunbar.

Stone and rubble will be stored eternally in the yard, it is either disposed of to landfill or used under an appropriate exemption.

### **3.6 Waste Outputs**

Once waste sorting operations have been undertaken in a controlled manner, materials stored and bulked pending removal for further recovery.

#### **3.6.1 Residual Waste**

Following manual waste treatment, a fraction of general waste may be generated. This waste will be sent for further recovery also.

### **3.7 Site Security**

The site benefits from metal lockable security gates to the entrance and a secure perimeter boundary. The main entrance is closed at 5pm.

The site has CCTV covering the site entrance and operational areas. This footage is saved for approximately 1 month.

No unauthorised persons are allowed access to the site and a record is to be kept of all authorised visitors.

All visitors to the site are required to report to the site office and sign in the visitors' book.

Regular inspections of the site are to be carried out to ensure that all gates, fencing and infrastructure are in a safe and secure condition. The findings of the inspection shall be recorded and any defects shall be rectified promptly.



Fencing and gates are to be maintained and repaired to ensure their continued integrity. In the event that damage is sustained, repairs are to be made by the end of the working day. If this is not possible, suitable measures are to be taken to prevent any unauthorised access to the site and permanent repairs are to be made as soon as practicable.

Operational procedures will ensure continual monitoring and maintenance of the security provisions at the site.

### 3.8 Site Inspections

The Site Manager/TCM or designated member of staff is to carry out a weekly inspection the site, completing the Site Inspection Sheet.

A walkaround of the site completing the required list of checks is carried out, answering yes or no as to whether the site is compliant or not. Any defects and remedial actions are also recorded when complete.

If there are any issues identified not in the scope of the inspection checklist, these comments will also be recorded in the site diary and addressed.

### 3.9 Monitoring and Control

There are no listed point source emissions from the site therefore there are no conditions of the environmental permit that set specific emissions limits.

Should any such parameter be imposed in the future then this procedure would be reviewed and amended accordingly.

### 3.10 Traffic Management

All vehicles must adhere to the site speed limit (5mph site speed limit).

Drivers are responsible for ensuring that their vehicle is safely loaded. Unsafe loads will not be accepted at the site and will not be allowed to leave the site until they have been made safe.

Drivers waiting to tip at the facility shall follow the instructions of site management and shall only tip in the designated area, unless advised otherwise.

No tipping shall take place over sorted stockpiles. Vehicles on site tipping or loading will be supervised by the Site Manager/or site operative.

Drivers must remain in the cab or stand well clear of the vehicle during loading or tipping.

Once the vehicle has been loaded it must be securely sheeted or covered before leaving the site.

When sheeting and unsheeting the vehicle ensure that the engine is switched off, the ignition key removed, and the parking brake is on.

### 3.11 Noise Management and Minimisation

All waste management operations on-site shall be conducted so as to prevent or reduce noise nuisance off-site. Noise shall be limited to such levels that are unlikely to cause pollution of the environment or harm to human health or serious detriment to the amenity of the locality outside the site boundary.

All site operations shall be conducted in such a manner that noise from such operations does not give rise to unacceptably high levels of noise.

The main sources of noise are as follows:

- Noise from vehicular movements (site access road and internal site movements);
- Dropping material from height and;
- Noise from operation of site plant including loading and unloading of materials.

It is considered that the generation of vibration as a result of operations at the site will not be significant.

The Site Manager and any staff employed at the site are trained in the need to minimise site noise and are responsible for monitoring and reporting excessive noise when carrying out their everyday roles.

### **3.11.1 Plant and Equipment**

Where practicable, the selection and use of low-noise equipment or alternative working methods is to be adopted to minimise the generation of noise at source. Inspection and repairs are to be undertaken in accordance with the manufacturers' recommendations.

Noise control is to be implemented through one or more of the following procedures:

- Care is to be taken during the unloading and loading of materials. For example, minimise drop heights to prevent unnecessary noise creation.
- Weekly checks are conducted with an auditory assessment made.
- Incoming wastes will be placed on the site surface not dropped from height.
- Site operations including treatment are restricted to hours specified in the planning consent.
- Timing of noisy works away from evenings and weekends.
- Follow site speed limits and ensure they are complied with by any vehicles using the site.
- Switch off plant and vehicles when not in use.

Plant is to be selected and operated to minimise noise. All site plant and machinery shall be operated and maintained in accordance with manufacturer's specifications. Site plant will be subject to a planned preventative maintenance schedule.

Auditory inspections shall be carried out in response to complaints.

A record of the inspection findings and any complaints are to be made in the Inspection Sheet or Diary and on the Complaint Recording (Form 7).

### **3.11.2 Monitoring**

If a noise problem is noticed or a complaint is received, it will be immediately dealt with by the Site Manager. The source of the problem will then be investigated, and appropriate corrective action will be taken.

In the event that noise derived from the site is detected beyond the site boundary by the Site Manager which in their opinion could give rise to complaints, investigation action shall be taken without delay. The nature of the investigation shall take into consideration weather conditions at the time and any operational issues together with the nature of the receptors. The following remedial action may be appropriate:

- Relocate plant and equipment to less sensitive locations;
- Minimising waste treatment operations;
- Undertake maintenance on equipment that will reduce noise levels;
- Modify plant to incorporate noise suppression equipment; and

Replace noisy plant and equipment with quieter models.

### 3.11.3 Complaint Records

A record relating to the management and monitoring of any noise complaints is to be maintained and documented in Form 7 (Complaints Record Form). The information required to complete the complaint form is as follows:

- Telephone number and location of caller (if provided);
- Date, time and duration of offending noise;
- Callers description of the noise and any other comments;
- Weather conditions;
- Wind strength and direction;
- Detail any other complaints about the noise;
- Potential noise sources that could give rise to the complaint;
- Operating conditions at the time of the noise issue;
- Any follow up taken with the caller; and if required
- Updates to this document.

## 3.12 Odour Management

The nature of the waste materials handled at the site means that odour is not likely to be an issue.

Notwithstanding this, a number of measures are to be employed to ensure that odorous wastes are not accepted at the site and, if accepted, are handled appropriately.

Odour control is to be implemented through the following procedures:

- Adhere to strict waste acceptance procedures to ensure only permitted wastes are accepted on-site;
- Keep the site clean and tidy by way of a regularised housekeeping regime;
- The Site Manager/Operatives are to monitor for odours throughout the working day;
- In the event that odours are detected, investigations are to be undertaken to determine the cause and appropriate remedial action taken;
- In the event that non-conforming wastes are delivered to site eg; contaminated material, they should be isolated and removed from site at the earliest opportunity. If identified on the vehicle the waste is to remain in the vehicle and be sent off site to a suitably permitted facility; and
- If identified following a delivery, the waste will be removed to a designated quarantine area pending removal off site to a suitably licensed facility.

### 3.12.1 Odour Survey

An odour survey or 'sniff test' is to be carried out by the TCM/Site Manager or designated person when on site. The findings and any comments will be recorded on the Site Inspection Sheet.

## 3.13 Pest Management

The nature of the waste materials handled at the site means that pest infestations are not likely to be an issue. Notwithstanding this, operations at the site are to be undertaken such that infestation or colonisation by pests are prevented.

On a weekly basis, the site will be inspected for pests by the Site Manager or designated person and recorded in the Site Inspection Sheet. Should any pest activity be noted this is to be recorded and relevant actions and monitoring recorded.

All waste areas can be accessed and kept clean to prevent historic wastes providing a source for rodents/pests/flies.

Site operatives employed on site are to be vigilant and report any potential infestations to the Site Manager, who will ensure appropriate measures are taken.

The following procedures will be followed to control and monitor any insect and rodent infestations:

- Surfaces used for the storage of waste are to be kept clean;
- Staff welfare/office areas will be kept clean and free of waste and exposed foodstuff;
- The site is to be monitored on a weekly basis for any visible signs of rodent or insect activity, such as runways, and the findings logged in the site check sheet;
- If any signs of potentially problematic numbers of pests or vermin are discovered at the site, the Site Manager or designated person is to contact a pest contractor as soon as possible; and
- Should the use of pesticides or other means of pest control be recommended, they must only be implemented by persons qualified/trained to carry out the necessary measures.

### **3.13.1 Management of pesticides**

In the event pest control products are required to be stored on site, the Site Manager or designated person will;

- Buy only enough pesticide for 3-6 months.
- Store pesticides away from waste stockpiles and operational areas.
- Keep pesticides in their original containers with the labels intact.
- Store in a separately and secure structure, away from children and pets.
- Do not store pesticides in cabinets near food, medical supplies or cleaning products.
- Do not store pesticides near water supplies.
- Flammable pesticides should be stored away from sources of heat, flame, or spark.
- Store pesticides in a dry area to prevent the deterioration of containers.
- Inspect pesticide containers frequently for damage.

Any waste/out of date pesticides are to be disposed of as per the manufacturer's instructions.

## **3.14 Litter Management**

All waste management operations on-site are to be undertaken to minimise windblown litter outside the site boundary. Due to the nature of wastes accepted on site litter should not arise during acceptance, treatment or storage.

Wastes are stored internally and externally in designated containers and stockpiles which provides containment of any potential windblown litter.

Weather conditions are monitored on a daily basis. During high winds care will be taken when unloading/loading wastes where the risk of windblown litter/debris is increased.

The external road is hosed down and swept with our road sweeper twice per day to keep dust levels down.

The yard is hosed down with water to help suppress dust and the main roller doors can also be closed to keep dust contained.

Staff also walk the perimeter to check for any litter each evening.

The site is to be operated to comply with the following principles:

- Adhere to strict waste acceptance procedures to ensure only permitted wastes are accepted on site;
- In the event of any nuisance from litter occurring, pick up the litter immediately;
- The Site Manager or designated person is to undertake a visual inspection, with a litter pick of the site and site perimeter; and
- All vehicles entering and exiting site will be covered/sheeted to prevent the escape of litter/dust.

On-site inspections for litter shall be made daily and remedial actions noted in diary and recorded on the Weekly Site Inspection Sheet.

### 3.15 Dust Management

Wastes handled on site are not expected to generate dust. However, during traffic movements entering and exiting the site, there is a risk that some dust could occur temporarily.

In order to prevent the generation of dust, the Site Manager/TCM or site operatives must follow the mitigation measures proposed below to minimise and avoid any fugitive dust emissions to the surrounding area.

- All wastes are to be stored within the designated areas;
- Adhere to the site's speed limit;
- Be vigilant in noticing if dust is being visually generated;
- Cease site waste movement operations during periods of high winds to reduce the risk of dust leaving site;
- Where required, operational areas are to be kept tidy to reduce dust emissions;
- If areas are dusty dampen down using the site water supply/hose;
- Utilise the site road brush if required to clear areas external pavement/roadways that are visually showing dust deposits from site operations.

Visual inspections are to be carried out by the Site Manager or designated person on a daily basis, and more frequently if required during dry and windy conditions. Weather conditions are monitored on a daily basis. During processing a checklist is also provided to record weather conditions, dust suppression if used and visual monitoring.

A 2 high screen/barrier along the perimeter of the site provides containment of any potential windblown litter that may impact on sensitive receptors.

The Site Manager or designated person shall assess the need for remedial action and implement such action where necessary. A record of the inspection findings and remedial action taken will be made on the site inspection sheet.

#### 3.15.1 Dust Monitoring

If dust is being generated the Site Manager or designated person will walk around the site and adjacent roads to determine if and dust from the site is causing an impact.

If dust from the site is causing an impact, the activities causing it will be ceased.

A note will be made in the site diary of action taken and a record made on the Site Inspection Sheet.

## 3.16 Training Procedure

The below procedure covers the training requirements for any staff employed on site and to maintain continued competence on site.

The site is to be managed by sufficient numbers of staff competent to operate the site without causing pollution. Staff are to have clearly defined roles and responsibilities.

Training is to be provided when:

- A new employee/site operative begins work on-site;
- New equipment is introduced on-site, thereby changing the site's operating procedures;
- An audit identifies a particular training need; and
- New procedures are introduced, or procedures set out within the EMS or FPP are amended.

### 3.16.1 Site Operative Training

The Site Manager or TCM is responsible for ensuring that all site operatives receive the correct level of training and that all new site operatives receive an induction. All new site operatives are to be provided with clear instructions regarding their individual tasks and requirements.

In particular, emphasis is to be made in ensuring all site operatives are aware of the following aspects and environmental considerations:

- The aims and objectives of the Environmental Policy of the company;
- The conditions set out in the environmental permit, such as: permitted waste codes (EWC) and activities;
- Regulatory implications of the environmental 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 conditions set out in the environmental permit;
- Prevention of accidental emissions and action to be taken should accidental emissions occur; and
- Training on plant and site specific equipment;
- The roles and responsibilities of all site operatives to ensure that all aspects of this EMS are complied with.

Training is to be provided as required to ensure that site operatives are familiar with their responsibilities and the conditions of the environmental permit. Training will also ensure that site operatives will be fully aware of how to maintain optimal plant performance.

A training records are kept in the site office for all site operatives. Staff responsibilities and training records are to be kept:

- recordings each employee's name and position within the company;
- the training required by each individual site operative;
- the date due and carried out;
- a date for a refresher of the training; and
- any further comments.

Regular toolbox training is also carried out, recorded and signed by staff.

All site operatives are to be aware of basic Health and Safety basic requirements, and also any specific Health and Safety related elements with respect to their role on site.

Any contractors enrolled on site will receive a suitable induction for Health and Safety and environmental risks.

Training records are kept up-to-date and stored on the computer system or paper training certificates are kept in the office.

### **3.16.2 Technically Competent Manager**

All operations at the site are to be under the control of a technically competent person as directed by the permit.

Copies of certification and qualification dates will be displayed in the site office. Every two years a continuing competency assessment is required to refresh and requalify the qualified person.

## **3.17 Accident Procedure**

The company recognises the importance of the prevention of accidents that may have environmental consequences and that it is crucial to limit those consequences. The company has developed a system to identify, assess and minimise the environmental risks and hazards of accidents and their consequences.

This accident management plan is to be implemented and maintained at the site to ensure the site and any site operatives are fully prepared for such incidents. The accident management plan is to 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.

This accident management plan describes the techniques to be implemented to minimise the risks posed to the environment. Activities affecting the health and safety (H&S) of any operatives, contractors and visitors are separately managed in compliance with H&S regulation.

### **3.17.1 Hazard Identification**

The following hazards have been identified:

- fire and explosion;
- loss of containment – spillage and leakage;
- unauthorised waste receipt and processing;
- security and vandalism; and
- flooding.

Risk assessments in relation to the identified hazards are included below.

### **3.17.2 Control Techniques**

The Site Manager or designated person ensures that:

- All incidents, near misses, abnormal events, changes to procedures and significant findings of maintenance inspections are logged and recorded in the Form 5 (Accident and Incident Record).
- Any site operatives employed have training requirements identified and the relevant training provided.

Accident Scenario and Consequence	Probability of accident occurring	Magnitude of Potential Impact	Risk rating before mitigation	Risk Management	Residual Risk Rating (following mitigation)
<p>Spillage or leakage during transfer/overfilling of substances e.g fuelling Oils, Fluids etc</p> <p>Spillage or leakage of fuels, oils and fluids could result in a release to the environment affecting local land quality, surface water or groundwater.</p>	Medium	Moderate	Medium	<p>Care is to be taken during the transfer of fluids to ensure that spillages/leaks are minimised.</p> <p>In the event of a spillage, use a spill kit to clean up the spill. Spill kits are located onsite.</p> <p>Storage tanks and containers are to be checked on a weekly basis to ensure there is sufficient capacity to prevent overfilling.</p> <p>In the event of a major spillage, which is causing or is likely to cause polluting emissions to the environment, immediate action is to be taken to contain the spillage and prevent liquid from entering surface water drains. The spillage shall be cleared immediately and placed in containers for offsite disposal, and the EA informed.</p>	Low
<p>Containment failure i.e. tank rupture, vehicle strike etc</p> <p>Spillage or leakage of fuel oils and fluids could result in a release to the environment affecting local land quality, surface water or groundwater.</p>	Low	Moderate	Medium	<p>Containers containing hazardous oils and fluids are stored in designated areas away from the permitted area.</p> <p>Vehicle operators are to maintain a safe distance from, tanks, drums, containers etc at all times.</p> <p>Plant and equipment is not to be refuelled in the permitted area.</p>	Low
Plant and equipment failure	Medium	Moderate	Medium	Plant and equipment are to be maintained in accordance with the manufacturer's recommendations.	Low



Accident Scenario and Consequence	Probability of accident occurring	Magnitude of Potential Impact	Risk rating before mitigation	Risk Management	Residual Risk Rating (following mitigation)
<p>Failure of plant and equipment can lead to impacts upon the environment if maintained or operated in accordance with the manufacture's recommendations.</p>				<p>Plant and equipment are to be operated in accordance with the manufacturer's instruction manuals.</p> <p>Plant utilised in the permitted area (if broken down or leaking) shall be removed off site immediately, or if it cannot be moved must have spill trays/bungs in place to control any escaping fluids.</p> <p>Induction training and refresher training is to be provided to staff in the safe operation of plant and equipment relevant to their role.</p> <p>Inspection of plant and equipment is to be undertaken on a daily basis to check for faults and ensure safeguards are in place for example pressure of vessels, guards on tools etc.</p> <p>In the event of a failure or suspected fault with an item of plant or piece of equipment, site management should ensure that the equipment is shut off in a safe manner and not used until the equipment can be repaired or replaced.</p>	
<p>Unauthorised waste receipt and processing</p> <p>Acceptance of unauthorised materials could result in impacts upon the environment for example odour, contamination of land, surface water or groundwater etc</p>	Low	Moderate	Medium	<p>Strict waste acceptance procedures are to be employed at the site as described in the Waste Acceptance Procedure.</p> <p>All wastes are to be subject to visual inspection and checking against the waste transfer note.</p> <p>In the event that unauthorised waste is delivered to the site, the waste is to be segregated and stored in a designated quarantine area prior to export from site to a facility licensed for its handling.</p>	Low
<p>Fire</p> <p>Risk of fire and electrical fires from</p>	Low	Severe	Medium	<p>All vehicles delivering waste will be checked for any evidence of waste that is on fire or that is smouldering on arrival at the site This</p>	Low

Accident Scenario and Consequence	Probability of accident occurring	Magnitude of Potential Impact	Risk rating before mitigation	Risk Management	Residual Risk Rating (following mitigation)
<p>incoming waste vehicles or plant</p> <p>Air transport of smoke, spillages and contaminated firewater by direct run off from site and via surface water drains.</p>				<p>is unlikely due to the waste types accepted at the site.</p> <p>The plant inspection schedule includes checks of electrical equipment used at the site to ensure that any faults are identified and repaired.</p> <p>Fire extinguishers are provided at designated locations.</p> <p>Smoking is not permitted in operational areas of the site.</p> <p>Regular assessment (Fire Audit) and training of employees in fire prevention.</p> <p>No wastes are to be burned on the site and any fire at the site is to be treated as an emergency.</p> <p>In the event of fire, the following action is to be taken:</p> <ul style="list-style-type: none"> <li>• Notify the fire brigade immediately and the Environment Agency as soon as practicable;</li> <li>• Isolate the burning area from other combustible materials and make attempts to extinguish the fire using the onsite fire extinguishers if safe to do so;</li> <li>• Where possible, try to prevent fire water from leaving the site; and</li> <li>• Evacuate the site if the fire is not containable.</li> </ul>	

Accident Scenario and Consequence	Probability of accident occurring	Magnitude of Potential Impact	Risk rating before mitigation	Risk Management	Residual Risk Rating (following mitigation)
<p>Security and vandalism</p> <p>Unauthorised access resulting in loss of containment or fire.</p>	Low	Moderate to Mild	Medium/Low	<p>The site has the following security measures in place;</p> <ul style="list-style-type: none"> <li>• Fencing: fencing extends around the site preventing access other than through the main gates</li> <li>• 24hr CCTV security in place</li> <li>• Inspection: Site fencing and gates are checked daily by the operations staff to identify deterioration and damage, and the need for any repairs. This would be recorded on the Site Inspection sheet or site diary.</li> <li>• Maintenance and repair: gates and fencing are to be maintained and repaired to ensure their continued integrity. In the event that damage is sustained, repairs are to be made by the end of the working day. If this is not possible, suitable measures should be taken to prevent any unauthorised access to the site and permanent repairs affected as soon as practicable;</li> <li>• Authorised access system: all visitors to the site are required to register in the site diary and sign out again on exit to minimise the risk of unauthorised visitors being present on site; and</li> <li>• Monitoring techniques: operational procedures, including regular inspections will ensure continual monitoring of security provision at the site.</li> <li>• In the event of a breach of security at the site, the cause will be investigated, and appropriate mitigation measures implemented. This will be recorded in the Accident and Incident Record Form. Records will include inspections and maintenance of security fencing and gates, breaches of</li> </ul>	Low

Accident Scenario and Consequence	Probability of accident occurring	Magnitude of Potential Impact	Risk rating before mitigation	Risk Management	Residual Risk Rating (following mitigation)
				security, investigations and actions taken.	
Flooding  Could lead to potentially contaminating liquids impacting on local land quality, surface water and groundwater.	Low	Moderate / Severe	Medium	The site is not located within an area identified by the Environment Agency as at risk of flooding.	Low

## 3.18 Spillage Procedure

The site is assessed for risk and control measures implemented to prevent/minimise the risk of a spillage.

All site surfaces will be inspected daily for the presence of spillages when the site is in operation. Any contaminated surface debris contaminated by oils, paint or fuels will be cleaned up and placed in a separate container and sent to a suitably permitted site for disposal.

### 3.18.1 On-site control procedures

To prevent spills or escape of oils/fluids on site the below control measures are put in place;

- Fuels and oils on site are stored in a designated area away from the permitted area;
- Spill kits on site; and
- Fuels and oils are stored away from moving vehicles and plant to prevent damage to containers/storage areas and to reduce the risk of contamination of waste and product onsite.

### 3.18.2 Major Spillage

In the event of a major spillage on site the Site Manager or designated person is to be contacted immediately and informed of the situation.

The spillage must be cordoned off. Site personnel must ensure that no persons or vehicles re-enter the affected area.

Should a major spillage occur, a check shall be conducted to ensure that all persons present on-site are safe and accounted for.

Any spillage of hazardous materials at the site shall be treated as an emergency and action taken as soon as practicable to absorb or contain it using the spill kit on site.

If the spillage cannot be controlled on-site, then a specialist contractor is to be contacted by telephone immediately.

The Operator/Site Manager is to contact the Environment Agency by telephone, and in writing, as soon as reasonably practicable, after a major spillage of hazardous materials to advise them of the incident and of the action taken.

A record in the site diary and incident report must be filled in to record any spills and action taken.

### 3.18.3 Minor Spillage

Action taken as soon as practicable to absorb or contain it using the spill kit on site.

A record in the site diary must be filled in to record any spills including remedial action taken.

Spill kits will be clearly visible on-site for all personnel and contractors to see with adequate signage to instruct anyone on-site of the location of these.

Full training is to be provided to all relevant staff on the correct use of the Spill Kits.

Spill kits are checked on a weekly basis to ensure there is sufficient supplies and equipment available.

### 3.19 Maintenance Procedure

All maintenance audits and monitoring for plant and equipment will be carried out in accordance with the manufacturer's specifications.

This procedure includes a proactive approach to maintenance programs. The site manages plant and equipment servicing and MOT records using a site maintenance planner.

Defect sheets are completed for all plant/machinery and repairs carried out by staff or by a suitably qualified mechanic. Defect sheets are checked by the Site Manager or designated site staff.

Maintenance of all equipment is overseen by the Site Manager, with the following information compiled;

- the item that will require maintenance;
- how often maintenance will need to be carried out;
- a record of any particular maintenance instructions; and
- who on site will be responsible for each maintenance check.

This will ensure that if any site operatives employed are aware of their particular responsibilities for maintenance checking and ensure that any site operatives are aware of any amendments and additional maintenance required.

When a maintenance issue is dealt with, the site diary will be updated.

This record will include the following information;

- the item/plant/vehicle maintained;
- the frequency any further required maintenance for instance; daily, weekly or monthly;
- completed date and who carried out by; and
- any particular comments.

The records including any certificates and invoices will be kept in the site office to ensure records are available for reference or inspection.

### 3.20 Complaints Procedure

Any complaints received from the local public will be recorded on (Form 6) Complaints Record Form.

The complaint will also be recorded in the Site Diary (or other recording system).

Site Management will follow the steps set out below if a complaint is received at the site:

1. Details of the complainant (including; name, address and a telephone number) if provided.
2. Make a record of the date and time the complaint was made.
3. What happened, what was the complaint actually about?
4. Was anyone else on site or other stakeholders aware of the issue and if so, who?
5. Once confirmation is made that the complaint issue relates to the site, investigate the source of the problem.
6. Record how the site has implemented methods to ensure the issue will not cause complaint in the future.
7. Make a record of any signs of pollution. If the complaint (such as emissions to groundwater or a local watercourse) is significant, the Environment Agency will need to be contacted on 0800 807060 as soon as possible. The severity of the incident will be determined by the Site Management.

8. For significant complaints email/verbal notification will be sent to the local Environment Agency office
9. All Complaint Record forms must be signed and dated.

Any actions taken in response to the complaint will be recorded on the Complaints Record form and the site diary.

The Environment Agency will be notified of any complaints received and the actions taken in response to the complaint. The complaints received will be reviewed during site audits to ensure the source of the complaint will be avoided in the future.

## **3.21 Contingency Planning**

### **3.21.1 Breakdowns**

Minor breakdowns can be managed with repairs will being carried out within 48 hours. All sites retain parts for some critical onsite equipment, in preparation for the maintenance and repair of onsite plant.

If repairs within this timescale are not possible, plant and equipment will be sourced from within the business or hired until such time as repairs have been completed.

If any vehicle, plant or equipment breakdown leads to an interruption to waste handling or processing, discussions will take place between senior management, to discuss and plan to divert waste elsewhere until such time as the site can resume normal operations.

In the event there is a significant breakdown which will impact site operations, the EA will be notified. Discussions between the site and the EA in respect to timescales in relation to the recommencing of site operations.

In the case of total plant failure resulting in a prolonged delay in site operations, the contingency plan would be to cease all waste acceptance and utilise company fleet to remove waste from the site to third-party waste management companies until the situation was resolved.

### **3.21.2 Enforced Shutdowns**

In the event the site is shut down for example due to flooding or major staffing issues, all deliveries to site will be ceased. Site security, emergency and fire prevention measures will be maintained. Senior site management will contact EA regarding actions and timescales in relation to the recommencing of site operations.

### **3.21.3 Fire**

In the event of fire or any other major incident on site the contingency plan will be implemented. This means that all operations i.e. waste acceptance and treatment will be ceased until the Environment Agency or Fire Service advises Senior Management that it is safe to carry out the activities.

### **3.21.4 Storage Capacity**

If during the visual site inspections, Site Management identify that waste storage areas are nearing/or at storage capacity, discussions will be made with senior management. Consideration will be made whether to:

- temporary cease waste acceptance until stockpiles are manageable;
- arrange for processed material to be moved off site utilising additional transport;
- divert wastes to other suitably permitted waste management facilities.

In the event of any delay to the removal of processed material from the site, senior management will contact the relevant 'waste receiver' in order to determine the anticipated length of the delay. If information received would result in an exceedance of the storage capacity, Site management will contact the EA immediately and incoming deliveries will be ceased.

In addition, in the event of a contract failure with, or closure of, a waste receiver (and its operations) that could result in the storage of material on-site for a long period, Senior Management will contact the EA immediately.

### 3.22 Record Keeping

The company will keep the below records along with all waste duty of care records.

- Permits/exemptions issued to the site;
- other legal requirements;
- risk assessments;
- transfer notes and any hazardous consignment notes (rejected waste or remediated material from a spill);
- copies of the management system and associated plans;
- health and safety records;
- all operating procedures;
- staff competence and training records;
- emissions and any other monitoring undertaken if required;
- compliance checks, findings of investigation and actions taken;
- complaints made, findings of investigation and actions taken;
- audits of management system, findings (reports) and actions taken;
- management reviews and changes made to the management system;
- testing and sampling results;
- waste returns.

Records will be kept up to date throughout the lifetime of the permit and will include the following information:

- records of any contamination and what was done in response to those incidents;
- records of any site audits, EA inspections, infrastructure or site improvements taken to protect land and since operation.

This is to show that the Operator has taken the necessary measures to avoid any pollution risk from site activities. Should the Operator wish to surrender the permit they can use the associated records to demonstrate they have returned the site to a satisfactory state and that the condition of land and groundwater has not deteriorated as a result of site activities.

### 3.22 Closure

This procedure outlines the preparation of the closure of the site at the end of its lifetime. The purpose of this procedure is to ensure that any site operative working on site is aware of the procedures in place to ensure when the site is closed the environment is protected.

The Operator is responsible for ensuring the delivery of all procedures described in the Environmental Management System.



Any changes required are the responsibility of the Operator/Site Manager or other designated person to update and re-issue the amended procedure.

In the event the decision has been made by Operator to surrender the permit, the need to show the necessary measures to avoid any pollution risks resulting from site activities must be provided along with the site has being returned to a satisfactory state.

Keeping the site condition up to date during the life of the permit will help demonstrate this. When applying to surrender a site condition report must be submitted.

Records relating to site inspection, repairs, spillages or non-compliances shall be kept in preparation for this purpose.

## **4.0 Recording and Reporting Forms**

The below forms will be used to carry out routine checks, routine maintenance, training and reporting.

Form 1	Site Inspection Sheet
Form 2	N/A
Form 3	Non-conformance Report
Form 4	Waste Rejection Record
Form 5	Accident and Incident Record
Form 6	Complaints Record Form
Form 7	Permit to Work
Form 8	Plant Inspection Sheet (example)