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Appropriate Measures Report – Non-Hazardous and Inert Waste

Prepared for:

AO Recycling Limited

Stafford Park Plastics Recycling Facility

11 Stafford Park

Telford

TF3 3AY

Contents Amendment Record

This report has been issued and amended as follows:

Revision	Description	Date	Author	Reviewer	Approver
0.1	Draft for internal review	September 2024	RM	GK	GK
1.0	First Issue to client	September 2024	RM	GK	GK

Executive Summary

The purpose of this Appropriate Measures (AM) report to explain the standards (appropriate measures) that regulated facilities permitted to store, treat or transfer (or both) non-hazardous and inert waste should consider.

The guidance applies to permitted waste management facilities including:

- household waste recycling facilities (civic amenity sites)
- waste transfer stations
- materials facilities
- inert waste, aggregate, soil and incinerator bottom ash treatment facilities
- treatment facilities for processing waste such as wood, tyres, plastics and mattresses

The guidance does not apply to all non-hazardous and inert wastes. It does not apply to exclusions from the Waste Framework Directive (WFD) or to certain processes which may involve non-hazardous or inert waste, such as:

- chemical treatment
- producing recycled paper and card
- using waste-derived fuel
- waste incineration or co-incineration, pyrolysis and gasification
- landfill of waste, or deposit for recovery activities
- treating landfill leachate
- in-situ remediation of contaminated soil
- mobile plant

In the guidance, the term ‘handling’ covers all site-based activities relating to waste, except for storage. Handling includes treatment as well as transfer activities like loading, unloading and moving waste within the facility.

There is overlap between Best Available Techniques (BAT) for waste installation facilities and necessary measures for waste operation facilities. The Environment Agency uses the term ‘appropriate measures’ to cover both sets of requirements.

The appropriate measures in this guidance apply to both new and existing facilities that store, treat or transfer (or both) non-hazardous or inert waste.

For existing facilities, if the cost of complying with the appropriate measures is disproportionate to the environmental benefit, immediate compliance may not be reasonable. Through permit reviews, the Environment Agency will assess the current operating techniques of existing facilities against the relevant appropriate measures.

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Section 1.0: Introduction

1.1 Background

AO Recycling Ltd is the recycling arm of a large white goods retailer. The company is based in Telford. The organizations main activities involve the recycling of Waste Electric and Electronic Equipment (WEEE) such as refrigerators, cookers, dishwashers etc. AO Recycling Ltd. has been trading since 2009 and is currently employing more than 250 people covering 3 sites, which includes the Plastics Recycling Facility (PRF) located at Stafford Park.

AO Recycling brings together AO with the former owners and managers of The Recycling Group (TRG). This Shropshire based business has more than a decade long track record in WEEE recycling. Having traded since 2009. AO Recycling is currently employing more than 300 people, covering three sites.
AO Recycling runs its own in-house transport which means that very bespoke and tailored WEEE collection and disposal service can be offered to customers.
The main processes are:

- collection of waste.
- acceptance of waste to the permitted site.
- sorting of waste.
- pre-destruction processing of waste.
- destruction.
- dispatch of clean, recycled materials for re-use.

The PRF Site accepts up to 50,000 tonnes per annum of mixed plastic waste originating from end-of-life refrigerators, WEEE, large domestic appliances and small domestic appliances. The waste is treated in a staged separation process. A maximum of 2,592 tonnes of waste can be stored on Site at any one time.

The PRF accepts mixed plastics from the shredding of end-of-life refrigerators, WEEE, large domestic appliances and small domestic appliances in the form of approximately 962 tonnes per week of Acrylonitrile butadiene styrene (ABS), Polystyrene (PS), Polypropylene (PP), PP filled, brominated and Polyvinyl Chloride (PVC) plastics.

The application of all aspects of the organisation's Integrated Management System (IMS) is rigorously assessed both internally and by external parties to ensure compliance with BS EN ISO 9001:2015 Quality Management Systems, BS EN ISO 14001:2015 Environmental Management Systems and BS ISO 45001:2018 Occupational Health and Safety Management Systems, legal and other requirements.

Section 2.0: General Management Appropriate Measures

The following measures apply to all processes and operation. These are appropriate measures for the environmental management of a regulated facility permitted to store, treat or transfer (or both) non-hazardous and inert waste.

Ref	AM requirement	Measures in place
2.1	**Management System**	
1	*You must have an up-to-date written management system, and activities at your facility must follow it. Your management system must incorporate the following features.* *You have:* • *management commitment, including from senior managers* • *an environmental policy that is approved by senior managers and includes the continuous improvement of the facility's environmental performance, so you can identify pollution risks and minimise them through appropriate measures* *You plan and establish the resources, procedures, objectives and targets needed for environmental performance alongside your financial planning and investment.* *You implement your environmental performance procedures, paying particular attention to:* • *staff structure and relevant responsibilities* • *staff recruitment, training, awareness and competence* • *communication (for example of performance measures and targets)* • *employee involvement* • *documentation* • *effective process control* • *maintenance programmes*	The purpose of AO Recycling Integrated Management System (IMS) Manual is to provide interested parties with a context of the organisation's ability to achieve outcomes of BS EN ISO 9001:2015 Quality Management Systems, BS EN ISO 14001:2015 Environmental Management Systems and BS ISO 45001:2018 Occupational Health and Safety Management Systems. AO Recycling reviews external and internal issues relevant to its Organisation periodically to ensure that it remains relevant to its activities and that any new or emerging Strengths, Weaknesses, Opportunities or Threats are identified with appropriate actions and responsibilities assigned. Consideration is given to the: ○ positive or negative factors or conditions. ○ external context and issues, such as legal, regulatory, technological, competitive, cultural, social, political, and economic environments. ○ internal context and issues, such as values, culture, organisation structure, knowledge, and performance of the business. ○ determination and requirements of the needs and expectations of interested parties relevant to the IMS. ○ authority and ability to exercise control and influence. ○ activities, products, and services relevant to the business.

Ref	AM requirement	Measures in place
	• *management of change* • *emergency preparedness and response* • *making sure you comply with environmental legislation* *You check environmental performance and take corrective action, paying particular attention to:* • *monitoring and measurement* • *learning from incidents, near misses and mistakes, including those of other organisations* • *records maintenance* • *independent (where practicable) internal or external auditing of the management system to confirm it has been properly implemented and maintained* *Senior managers must review the management system to check it is still suitable, adequate and effective at least annually. Improvements should be carried out within a reasonable time, based on the level of environmental risk.* *You review the development of cleaner technologies and their applicability to site operations. We would expect cleaner technologies to be considered:* • *as a result of substantiated pollution incidents* • *when reviewing management systems* • *when planning investment decisions, for example new items of plant* *When designing new plant, you must assess the environmental impacts from the plant's operating life and eventual decommissioning. You must make sure that new plant is authorised by your environmental permit.* *You must have a written procedure for proposing, considering and approving changes to procedures or infrastructure related to storing or treating waste or pollution control. This is so you can track and control the process of change.*	Documented information is retained as evidence to support that the context of the organisation has been considered in the IMS. AO Recycling's monitors and reviews actions and assigned responsibilities for all S.W.O.T via the organisation's risk register. AO Recycling periodically identifies, reviews, and monitors the needs and expectations of all interested parties. As defined in the standards, interested parties are any 'person or organisation that can affect, be affected by or perceive itself to be affected by a decision or activity'. AO Recycling identifies the needs and expectations of the following parties and, via various aspects of its IMS achieves intended outcomes: ○ legal and Regulatory authorities. ○ customers. ○ internal stakeholders (AO World Plc, AO Recycling Board, AO Recycling Employees, Shareholders). ○ suppliers & Distributors, Contractors and Subcontractors. ○ Professional Bodies. ○ Trade Associations. ○ Assessment bodies. ○ Local Community. ○ general public. ○ media. The organisation manages the needs and expectations of interested parties throughout all stages of its activities, by developing and maintaining open and collaborative relationships with all stakeholders.

Ref	AM requirement	Measures in place
	You consider the risks that a changing climate poses to your operations. You have appropriate plans in place to assess and manage future risks. *You compare your facility's performance against relevant sector guidance and standards on a regular basis, known as 'sectoral benchmarking'.* *You have and maintain the following documentation as part of your management system:* • *inventory of emissions to air and water* • *residues management plan* • *accident management plan* • *site infrastructure plan* • *site condition report for new facilities or where you are increasing the facility's area* • *odour management plan, if required* • *noise and vibration management plan, if required* • *dust, mud and litter management plans, if required* • *pest management plan, if required* • *fire prevention plan, unless your facility does not handle combustible waste* • *climate change risk assessment and adaptation plan* *Your management system must include a schedule of inspection and maintenance for all pollution control infrastructure, including for example the:* • *impermeable surfacing and drainage system* • *ducts of abatement systems* *You must have a document control procedure that clearly describes how and when you will periodically review documentation and maintain version control.*	AO Recycling maintains an interested parties register to ensure that control measures for ensuring the needs and expectation of all interested parties have been considered and are implemented. A review of all interested parties and identified control measures is conducted as part of the Management Review Process. Senior Management at AO Recycling demonstrates leadership and commitment with respect to all its Quality, Health, Safety and Environmental Management. This commitment is clearly defined in the organisation's policy statements and reflected throughout its procedural documents and systems of work. To achieve this, the organisation's Top Management: ○ take accountability for the effectiveness of the IMS. ○ take overall responsibility and accountability for the prevention of work-related injury and ill health, as well as the provision of safe and healthy workplaces and activities. ○ ensure that organisational policies are established and maintained which are compatible with the organisation's context, its strategic direction and clearly communicate its commitment to Quality, Health & Safety and Environmental management. ○ establish and maintain Quality, Health, Safety and Environmental objectives for the IMS that are compatible with the organisation's context and its strategic direction. ○ ensures the IMS requirements are integrated into the Organisation's business processes.

Ref	AM requirement	Measures in place
	Your management system must clearly set out the actual physical capacity of your facility to store and handle waste, which may be less than the quantity limits allowed by your permit. You must specify limits for the maximum: • *waste storage capacity at any one time* • *daily and annual throughputs* • *residence time for waste* *When doing this, you must take into account the characteristics of your facility and the waste types and the pollution risks, for example fire and odour.* *Your limits must also reflect the constraints of the available space and waste handling processes. You must include factors like seasonal changes in supplies of inputs, and markets for outputs. More information on understanding capacity is available in our RGN 2 guidance.*	○ ensure that physical and financial resources are made available for the implementation, management, and continual improvement of the IMS. ○ promote the importance of effective management and of conforming to the IMS requirements. ○ promote and implement a process approach and risk-based thinking. ○ fulfil the organisation's compliance obligations. ○ participate in the IMS review process AO Recycling's Senior Management are 'customer focused' ensuring that all customer needs, applicable statutory & regulatory requirements are understood and met. An emphasis on enhancing customer satisfaction is also achieved via open and consistent communication. Customers are encouraged to also provide feedback as to the quality of service provided and opportunities for improvement. AO Recycling's Senior Management encourages worker participation in the development, implementation, and maintenance of its IMS. To achieve this, AO Recycling protects workers from reprisals when reporting incidents, hazards, risks, and opportunities, implements processes for the consultation and participation of workers and supports the establishment and functioning of health and safety committees. All roles, responsibilities, and authorities relevant to all AO Recycling employees are outlined in roles, responsibilities and authorities' section of this

Ref	AM requirement	Measures in place
		policy manual. In addition, roles and responsibilities are described in job position descriptions, employee contracts and work instructions. **AO Recycling Environmental Policy** AO Recycling is committed to pursuing excellence in everything it does, and this includes the protection of the environment. **General Principles** AO Recycling and its management team are committed to the care of the environment and the prevention of pollution. AO Recycling seeks to recycle waste electric and electronic equipment in conformance with the relevant environmental legislation using the best available techniques and to the highest standard. To ensure the achievement of the above commitment, AO Recycling has implemented an environmental management system which satisfies the requirements of BS EN ISO 14001. An essential feature of the environmental management system is a commitment to continually improving environmental performance and the prevention of pollution which involves all levels of the business from senior management to operatives. We expect staff, visitors, contractors and other employers who work at AO Recycling to share this commitment by complying with our policies and our procedures and to understand that they too have legal and moral obligations to themselves and to one another. This policy is communicated to all staff during the induction process.

Ref	AM requirement	Measures in place
		All members of AO Recycling staff are challenged with promoting our commitment to the environment and to meeting the high environmental standards and objectives.
2.2	**Staff Competence**	
1.	*Your facility must be operated at all times by an adequate number of staff with appropriate training, qualifications and competence. You must keep records of training, qualifications and relevant experience.*	AO Recycling ensures that any worker engaged to undertake activities or provides a service is suitably qualified and has sufficient competence. Prior to employment the HR Department identifies the required experience, qualifications, etc. required by prospective candidates. These requirements are clearly defined in all position descriptions, with competency and experience assessed as part of the interview process. To further support the competency of all workers, the organisation maintains a training matrix that identifies all qualification, training & other requirements for various defined roles. The register is maintained by Managers in collaboration with HR/SHEQ Team and is regularly reviewed and updated to ensure workers hold all current licences, accreditation, and experience. AO Recycling maintains a Procedure to assist with the identification of all aspects of the organisation's training requirements. This includes statutory & regulatory requirements, health, safety & environmental legal obligations, as well as other requirements to which the organisation subscribes. AO Recycling maintains a Procedure in order to ensure that all contractors and subcontractors maintain current licences and accreditation and possess relevant experience and competence prior to work being undertaken. Contractor's competence and qualifications are monitored using the Approved Contractor Register and associated records.
2.	*If you operate a 24-hour process, you must have:*	The Site is operational between 06:00 and 22:00 on weekdays, during which time at least one staff member will be present on Site. In the event of a fire, the

Ref	AM requirement	Measures in place
	• *remote or telemetric systems to make sure an alarm would be raised in the event of an incident during unmanned hours* • *appropriate personnel on call to deal with these incidents* *You must explain these procedures in your management system.*	Fire Service would be able to gain immediate access during these hours. The Site will not open on Saturday, Sunday or public holidays.
3.	*The design, installation and maintenance of infrastructure, plant and equipment must be carried out by competent people, including Construction Quality Assurance where appropriate.*	AO Recycling maintains design and development procedure and associated processes to manage the design and development of new products, services and processes. The following aspects of the design and development process are considered: ○ identification and evaluation of need for new products, services and processes; ○ planning – determining the stages, resources and controls required; ○ inputs – identifying the requirements essential in realising new product, service, process; ○ controls – to ensure results to be achieved are defined, verification activities, validation activities; ○ outputs – which meet input requirements and are adequate; ○ changes – either during process or after, are identified, reviewed and controlled and do not impact on conformity to requirements. AO Recycling shall retain documented information on all aspects of the design and development process.
4.	*You must have appropriately qualified managers for your waste activity who are members of a government approved technical competence scheme and who attend the facility as set out in our attendance guidance.*	Technical competence is maintained at all times and records kept of attendance.
5.	*Staff carrying out waste acceptance checks, including sampling and analysis of waste, must be appropriately trained and competent to:* • *classify and characterise waste properly*	AO Recycling ensures that any worker engaged to undertake activities or provides a service is suitably qualified and has sufficient competence.

Ref	AM requirement	Measures in place
	• *identify whether it is suitable for your facility* • *manage any loads that do not conform to waste acceptance criteria* • *determine end of waste products*	To further support the competency of all workers, the organisation maintains a training matrix that identifies all qualification, training & other requirements for various defined roles. The register is maintained by Managers in collaboration with HR/SHEQ Team and is regularly reviewed and updated to ensure workers hold all current licences, accreditation, and experience.
2.3	**Accident Management Plan**	
1.	*As part of your written management system you must have a plan for dealing with any incidents or accidents that could result in pollution, including near misses.*	Appropriate and prompt action is taken in the event of an incident occurring, investigations of accidents, incidents and near misses are carried out by the relevant section manager.

2.	*The accident management plan must identify and assess the risks the facility poses to human health and the environment. Particular areas to consider may include:*
	• *waste types*
	• *transferring substances, for example filling (including overfilling) or emptying of vessels and containers*
	• *preventing incompatible substances coming into contact with each other*
	• *failure of plant and equipment, for example storage tanks and pipework, or blocked drains*
	• *failure of containment, for example bund failure or drainage sumps overfilling*
	• *making the wrong connections in drains or other systems*
	• *failure to contain firefighting water*
	• *failure of abatement systems*
	• *hazardous atmospheres in confined spaces*
	• *failure of main services, for example power, steam or cooling water*
	• *checking the composition of effluents before their emission*
	• *vandalism and arson*
		AO Recycling Ltd. ('AO Recycling Stafford Park' or the 'Facility') has identified through risk assessment that incidents with the potential for fire or the uncontrolled releases of a hazardous substances could occur at its premises. This in turn could pose a substantial threat to health and safety and as such suitable emergency response plan must be established relating to evacuations and the defensive or offensive responses or clean-ups conducted by a group of selected and trained employees or by other designated responders (i.e., mutual aid groups, local fire departments, etc.).
		Emergency response is required for, but is not limited to a:
		• release requiring immediate attention because of imminent danger.
		• release posing, or has the potential to pose:
		  ○ conditions that are immediately dangerous to life or health (IDLH).
		  ○ a serious threat of fire or explosion (exceeds or has the potential to exceed the lower explosive limit or lower flammable limit).
		  ○ high levels of exposure to toxic substances

Ref	AM requirement	Measures in place
	• *operator error* • *accessibility of control equipment in emergency situations* • *extreme weather conditions, for example flooding or very high winds*	○ uncertainty whether employees in the work area can handle the severity of the hazard with PPE and equipment provided and the exposure limit could easily be exceeded. • response comes from outside the immediate release area. • release requiring evacuation of employees in the area; and/or • where a situation is unclear, or data are lacking on important factors.
3.	*You must assess the risk of accidents and their possible consequences. You can use our risk assessment guidance to help you to do this. Risk is the combination of the likelihood that a hazard will occur and the severity of the impact resulting from that hazard.* *Having identified the hazards, you can assess the risks by addressing six questions:* • *how likely is it that the accident will happen?* • *what may be emitted and how much?* • *where will the emission go – what are the pathways and receptors?* • *what are the consequences?* • *what is the overall significance of the risk?* • *what can you do to prevent or reduce the risk?*	AO Recycling maintains a procedure and work instructions to support the identification of Health and Safety hazards, the risk assessment process and controls to be implemented to reduce risks related to its activities and services over which it has control or influence. Health and Safety hazards are identified and analysed for risks in the organisations risk assessments. Risk assessments are monitored, reviewed, and revised either periodically, or where there has been a significant change, e.g. people, equipment, process, legislation or after an accident, incident or near miss.
4.	*The depth and type of accident risk assessment you carry out will depend on the characteristics of your facility and its location.* *The main factors to take into account are the:* • *scale and nature of the accident hazard presented by the facility and its activities* • *risks to areas of population and the environment (the receptors)*	Through collaboration with Department Managers, compliance staff of AO Recycling are competent to make sure risk assessment and environmental aspects are documented and actions undertaken where there are risks to people, property, the environment, AO Recycling or AO.com.

Ref	AM requirement	Measures in place
5.	*Through your accident management plan, you must also identify the roles and responsibilities of the staff involved in managing accidents. You must provide them with clear guidance on how to manage each accident scenario, for example as a result of a spillage of a potentially polluting liquid*	AO Recycling ensure that appropriate and prompt action is taken in the event of an incident occurring and investigate or aid in the investigation of accidents, incidents and near misses.
6.	*You must have a suitably trained facility employee available at all times who will act as an emergency coordinator and will take lead responsibility for implementing the accident management plan.*	AO Recycling ensure personnel are trained to the required standards.
7.	*You must train your employees so they can perform their duties effectively and safely and know how to respond to an emergency.*	AO Recycling ensure personnel are trained to the required standards.
8.	*You must also:* • *show how you will communicate with relevant authorities, emergency services and neighbours (as appropriate) before, during and after an accident* • *implement emergency procedures, including for safe plant shutdown and site evacuation* • *implement post-accident procedures that include carrying out an assessment of the harm an accident may have caused and the remediation actions you will take* • *consider the impact of accidents on the function and integrity of plant and equipment* • *have contingency plans to relocate or remove waste from the facility, and suspend incoming waste* • *test the accident management plan by carrying out emergency drills and exercises*	An emergency contact sheet is included in the ERP. In the event of a fire the following procedure will be followed: • The Site Manager or individual nominated by the Site Manager will locate the emergency contact list included in Appendix 8. • In the event of a large fire, 999 will be dialled first. • The Site Manager or individual nominated by the Site Manager will phone each of the local businesses included in Appendix 8, followed by the sewage service if appropriate to do so; and • Finally, the EA incident hotline will be dialled once the situation is under control. Senior Personnel are designated as Emergency Incident Controller & Business Continuity Core Team, responsible for coordinating all emergency functions. Primary responsibilities: • Maintain a current Emergency Response Plan. • Evaluate emergency risk and develop/maintain emergency response plans and procedures.

Ref	AM requirement	Measures in place
		• Activate the Emergency Response Plan. • Lead the emergency response. • Inform the Business Continuity Team of the potential outage and impacts. • Receive and disseminate information about an emergency. • Prevent unauthorised entry into hazardous or secured areas. • Coordinate shutdown and start-up procedures with the appropriate personnel. • Ensure that vital records are protected from the effects of a disaster. • Follow up with appropriate notifications to governmental regulatory agencies; and • Assess the incident and make recommendations to revise the Emergency Response Plan accordingly.
9.	*After a flooding event you must inspect and assess the integrity of affected plant and equipment, in particular infrastructure that may have been in contact with floodwater or groundwater. Tank inspections should include non-destructive testing methods to verify their integrity.*	The Site lies within a flood zone 1 and therefore has a low probability of flooding.
10.	*You must take the following measures, where appropriate, to prevent events that may lead to an accident.* *You must have appropriate procedures set out in your accident management plan.*	Periodic inspections and tests are conducted on all safety sensitive installations and equipment to ensure that they continue to work as effectively as originally intended by their design and purpose, consequently helping to protect health and safety of all personnel at AO Recycling Stafford Park premises. The planned inspection, test and maintenance schedules are designed to identify any adjustments or repairs that the emergency control systems may require. There are key spare parts available and contingency plans in place for machinery breakdown including the control systems.
2.3	**Accident Management Plan – Preventing accidental emissions**	

Ref	AM requirement	Measures in place
11.	*You must make sure that you contain the following (where appropriate) and route to the effluent system (where necessary and lawful):* • *process waters* • *site drainage waters* • *emergency firefighting water* • *chemically contaminated waters* • *spillages*	The Site Manager or individual nominated by the Site Manager will phone the sewage service if appropriate to do so;
12.	*You must have planned for how you will manage the impacts of tidal surges and storm water flows. You must consider abnormal operating scenarios and incidents, for example, by providing buffer storage capacity. You should take into account the:* • *nature of the pollutants* • *potential pathways* • *effects of downstream waste water treatment* • *sensitivity of the receiving environment*	The Site lies within a flood zone 1 and therefore has a low probability of flooding. Site Management responsible for implementing risk management measures in accordance with the Site's Integrated Management System (IMS), which is certified to ISO 9001, 14001 & 45001.
13.	*If buffer storage capacity is required, you can only discharge from it after you have assessed the water for contamination, in order to identify an appropriate disposal route.*	When analysis report is obtained, it shall be reviewed to determine if the effluent exceeds any limits/thresholds stated in the Site's Environmental Permit and Site's Consent to Discharge. If the analysis results are below all limits/thresholds, the effluent can be discharged into the drainage network with a flow rate no greater than 2 m/s. Temperature and pH shall be tested prior to discharge from the discharge point to make sure that the effluent is within the boundaries stated on the Site's Consent to Discharge. Note: The maximum volume of trade effluent to be discharged in any continuous period of 24 hours shall not exceed 90 cubic metres.

Ref	AM requirement	Measures in place
		If analysis shows that any threshold/limit has been reached, the effluent shall be transferred to a suitably licenced site via a licenced waste carrier. The effluent will be treated according to what limits were breached. If POPs are found to be in the effluent, treatment shall be high temperature incineration.
14.	*You must implement spill contingency procedures to minimise the risk of an accidental spill entering watercourses or sewers or contaminating land.*	The site drainage system is provided with a penstock (sluice gate) to control or isolate water flows. In an event that surface water becomes contaminated, the penstock may be closed to contain spillages and leaks up to a pre-defined capacity. The penstock system is subject to planned maintenance and is periodically tested and inspected and relevant records are retained.
15.	*You must take account of additional firefighting water flows or firefighting foams, as set out in our fire prevention guidance. You may need infrastructure like emergency storage lagoons to prevent contaminated firefighting water from reaching a receiving water body.*	During a fire, it is anticipated that a maximum of 494,942.4 litres of water will run off the waste. The primary and secondary means of containment detailed below provide sufficient containment for all likely firewater arising from an incident. (In reality the fire-water to be contained will be less as a significant proportion will evaporate.) Waste Storage Area Kerbing and Containment Bund (Primary) The Site benefits from 15cm kerbing at the perimeter of the Site, with the only exception being the site entrance and exit. A containment bund has been placed between the processing building and southern kerbing to contain any runoff from the waste storage area. As a primary means of containment on Site, the kerbing and containment bund can hold 599.7 m3 9 (599,700 litres) of water. This ensures any potentially contaminated firewater generated in the waste storage area is fully contained. The containment of firewater here will enable the Fire Service to recycle it if appropriate to extinguish the fire.

Ref	AM requirement	Measures in place
16.	*You must consider and, if appropriate, plan for the possibility that you may need to contain or abate accidental emissions from:* • *overflows* • *tank failures* • *tank wall penetrations* • *site plant or machinery leaks*	Hazardous material tanks are situated within designated locations provided with impervious and chemically compatible secondary containment with sufficient capacity to contain at least 25% of the total volume of the primary containers or 110% of the volume of the largest container, whichever is greater, hence minimising the risk of a spill incident from a tank to escape. All secondary containment bunds on site are subject to periodic inspections and relevant records are retained.
2.3	**Accident Management Plan – Security measures**	
17.1	*You must have security measures (including staff) to prevent unauthorised access to your facility, so preventing:* • *damage to equipment* • *theft* • *illicit dumping and fly-tipping* • *arson*	The Site is enclosed by perimeter fencing and benefits from a Site entrance gate designed to prevent unauthorised access. The Site will be operational between 06:00 and 22:00 on weekdays with a significant amount of Site operatives present at these times.
17.2	*Depending on your risk assessment, facilities must use an appropriate combination of:* • *security guards* • *total enclosure (usually with fences)* • *controlled entry points* • *lighting* • *warning signs* • *24 hour surveillance, such as CCTV*	Outside of working hours or during any periods of shut down for maintenance, the Site will be monitored remotely using CCTV which will be observed by a member of staff at AO's Halesfield Site. All doors to buildings will be locked when not in use and the factory building is protected by a monitored alarm system.
2.3	**Accident Management Plan – Fire Prevention**	
18.	*If your permit allows you to store or treat combustible waste, you must have a fire prevention plan that meets the requirements of our guidance.*	

Date	Version	Author	Description of Change	Authorised by:

Ref	AM requirement	Measures in place
		April 2019 | V2 | MP | FPP prepared for AO Recycling Limited | AS 15/08/2023 | V3.1 | MP | FPP review and update. POPs added section 1.7.2 & amended 3.5.3 | GD 14/08/2024 | V4.1 | MP | FPP review and update. | AS Next Review: 14/08/2029
2.3	**Accident Management Plan – Other accident prevention measures**	
19.	*You must maintain plant control in an emergency using one or a combination of:* • *alarms* • *trips and interlocks* • *automatic control systems* • *tank level readings such as ultrasonic gauges, high level warnings, process interlocks and process parameters*	Operational features, such as heater and control systems, are fitted with emergency prevention devices including interlocks and remote shut-off valves, are provided with sprinkler protection and are generally contract maintained and all subject to planned preventative maintenance.
20.	*You must:* • *make sure that all the measurement and control devices you would need in an emergency are easy to access and operate in an emergency situation* • *maintain plant in a good state through a preventive maintenance programme and a control and testing programme* • *use techniques such as suitable barriers to prevent moving vehicles damaging equipment*	Spill absorbent pads and clean-up kits with relevant PPE are stored at designated Spill Kit Stations to enable timely response to minor spill incidents and potentially support post emergency clean-up. Cordons/barriers preventing access and other methods of warning (sirens, beacon lights etc.) the public and others are put in place where appropriate. Adequate workplace signage is provided both to aid evacuation and to enable emergency response. Where required, the signs provided are illuminated. Emergency Response Kits comprising yellow/red high visibility vests, torches, radios, and spare batteries are located at designated locations at the premises for use by members of the Emergency Response Team.

Ref	AM requirement	Measures in place
	• *implement procedures to avoid incidents due to poor communication between operating staff – during shift changes and following maintenance or other engineering work*	The Site always maintains good housekeeping to ensure that: • Emergency routes are kept unobstructed. • Emergency signage are visible. • Emergency response equipment are accessible; and • Incidents are more likely noticeable at early stages. AO Recycling has developed evacuation procedures to define required staff action, communication, and arrangements for contacting the emergency services.
2.3	**Accident Management Plan – Record keeping and procedures**	
21.	*You must:* • *keep an up to date record of all accidents, incidents, near misses, changes to procedures, abnormal events, and the findings of maintenance inspections* • *carry out investigations into accidents, incidents, near misses and abnormal events and record the steps taken to prevent their reoccurrence* • *maintain an inventory of substances which are present (or likely to be) and which could have environmental consequences if they escape*	• Head of Compliance SHEQ Manager is responsible for the collation of accident, incident and quality data, analyse and inputting the information into Management Review. • Head of Department, Operations, Plant, Department Managers are responsible for ensuring that appropriate and prompt action is taken in the event of an incident occurring and investigate or aiding in the investigation of accidents, incidents and near misses. • AO Recycling maintains a procedure and associated processes to identify potential for emergency situations and incidents that can impact on health, safety, the environment, or quality of the services associated with its operations.
22.	*You must notify the Environment Agency without delay if you detect any of the following events and they are causing, or may cause, significant pollution:* • *a malfunction* • *a breakdown or failure* • *an accident* • *emission of a substance not controlled by an emissions limit*	In the event of a significant event the following procedure will be followed: • The Emergency Response Co-ordinator or Deputy will locate the emergency contact list; • In the event of a large fire, 999 will be dialled first;

Ref	AM requirement	Measures in place
	• *breach of an emissions limit*	• The Emergency Response Co-ordinator or Deputy will phone each of the local businesses included in Appendix 01 of the FPP, followed by the sewage service if appropriate to do so; and • Finally, the EA incident hotline will be dialled once the situation is under control. • In the event of a major spillage immediate action will be taken to contain the spillage and prevent liquid from entering surface water drains and the unsurfaced ground. The spillage will be cleared immediately and placed in containers for off-site disposal and the EA will be notified.
2.4	**Contingency Plan and Procedures**	
1.	*You must implement a contingency plan so that you:* • *comply with all of your permit conditions and operating procedures during maintenance or shutdown at your facility, including disruption at other facilities that would affect supplies to your facility or the removal of waste from it* • *do not exceed limits in your permit and continue to apply appropriate measures for storing and handling waste* • *stop accepting waste unless you have a clearly defined method of recovery or disposal and enough permitted capacity*	The Site has been certified by an accredited certification body to ISO 14001:2015. As part of our management system, we have arrangements to deal with emergency preparation and response. We have in place an Emergency Response Strategy, which addresses issues such as pre-emergency planning, co-ordination with outside parties, roles and responsibilities, passive and active protection, Emergency response and post emergency recovery. In addition, there is an escalation process in place, which activates Business Continuity Plans. There are contingency plans to deal with an outage at the Stafford Park Site. These contingencies include sending plastic flake to other processors depending on the current capacity of the industry, this could involve using the Site at Halesfield 13, Telford. Note: AO Recycling discounted sending plastic to other plastic processors. We discounted this option due to the current limited capacity within the industry. If

Ref	AM requirement	Measures in place
		we used this option, the plastic would most likely be sent for EfW via high temperature incineration rather than treatment.
2.	*You must have contingency procedures to make sure that, as far as possible, you know in advance about any planned shutdowns at waste management facilities to which you send waste.*	Planned shutdowns at waste management facilities to which AO send waste are taken in to consideration when despatching wastewater.
3.	*You must make your contracted or regular customers are aware of your contingency plan and of the circumstances in which you would stop accepting waste from them.*	Contracted customers are aware of the AO contingency plan and of the circumstances in which AO would stop accepting waste from them.
4.	*You must consider whether the sites or companies you rely on in your contingency plan:* • *can take waste at short notice* • *are authorised to do so in the quantities and types likely to be needed, in addition to carrying out their existing activities*	Other sites and companies are authorised to do so in the quantities and types likely to be needed, in addition to carrying out their existing activities
5.	*If you could exceed your permitted limits, or compromise your storage or handling procedures, you must not discount alternative disposal or recovery options on the basis of extra cost or geographical distance.*	Temporary storage for additional waste at the is authorised for this storage and the appropriate infrastructure is in place at the site.
6.	*You must not include unauthorised capacity in your contingency plan. If your contingency plan includes using temporary storage for additional waste at your facility, then you must make sure that your facility is authorised for this storage and you have the appropriate infrastructure in place.*	Temporary storage for additional waste at the is authorised for this storage and the appropriate infrastructure is in place.
2.4	**Contingency Plan and Procedures – Contingency measures for treatment only**	
7.	*Your management procedures and contingency plan must:* • *identify your technology's known or predictable malfunctions and the procedures, spare parts, tools and expertise needed to deal with them – so you can minimise predictable malfunctions and fix them quickly*	Periodic inspections and tests are conducted on all safety sensitive installations and equipment to ensure that they continue to work as effectively as originally intended by their design and purpose, consequently helping to protect health and safety of all personnel at AO Recycling Stafford Park premises. The

Ref	AM requirement	Measures in place
	• *include a record of spare parts held, especially critical spares, or state where you can get them from and how long it would take* • *have a defined procedure to identify, review and prioritise items of plant which need a preventative regime* • *include all equipment or plant whose failure could directly or indirectly affect the environment or human health – if the equipment or plant is process critical then you may need to stop accepting waste or shut down your process* • *make sure you have the spare parts, tools, and competent staff needed before you start maintenance*	planned inspection, test and maintenance schedules are designed to identify any adjustments or repairs that the emergency control systems may require. There are key spare parts available and contingency plans in place for machinery breakdown including the control systems.
8.	*If you produce an end-of-waste material, your contingency planning must consider storage capacity for end-of-waste products and materials that fail the end-of-waste specification.*	End-of-waste products and materials that fail the end-of-waste specification are temporarily stored on site prior to despatch.
9.	*Your management system must include procedures for auditing your performance against all of these contingency measures and for reporting the audit results to the site manager.*	AO Recycling maintains a procedure and associated processes that defines the mechanism of internal audits to determine conformity with the requirements of the Integrated Management System. This includes an annual assessment of the effectiveness of the organisation's IMS, as well as evaluation of legal and other requirements. The procedure determines audit criteria, scope, frequency and methodology and details responsibilities and requirements for planning and conducting internal audits, and for reporting results and maintaining records. An audit program is maintained to assess the effectiveness of processes for quality, health, safety & environmental management. The program includes planned audits, compliance evaluations and inspections of IMS procedures, instructions, and processes.

Ref	AM requirement	Measures in place
		An Internal Audit Register has been developed and maintained to manage the internal audit programme.
2.5	**Facility Decommissioning**	
1.	*You must consider the decommissioning of the facility at the design stage and make suitable plans to minimise risks during decommissioning.*	The site is currently operational, however new treatment processes are designed with planned decommissioning of the facility.
2.	*For existing facilities where potential risks are identified, you must implement a programme of design improvements. These design improvements must make sure that you:* • *avoid using subsurface tanks and pipework* • *drain and clean out vessels and pipework before dismantling* • *use insulation which you can remove easily without dust or hazard* • *use recyclable materials, taking into account operational or other environmental objectives*	Options for design improvements are investigated to: • avoid using subsurface tanks and pipework • drain and clean out vessels and pipework before dismantling • use insulation which you can remove easily without dust or hazard • use recyclable materials, taking into account operational or other environmental objectives
3.	*You must maintain a decommissioning plan to demonstrate that:* • *plant can be decommissioned without causing pollution* • *the site will be returned to a satisfactory condition*	A site closure plan will be maintained to demonstrate that, in its current state, the installation can be decommissioned to avoid any pollution risk and return the site of operation to a satisfactory state. The plan is kept updated as material changes occur. Common sense is used in the level of detail, since the circumstances at closure will affect the final plans. However, the closure plan includes: • either the removal or the flushing out of pipelines and vessels where appropriate and their complete emptying of any potentially harmful contents • plans of any underground pipes and vessels • the method and resource necessary for the clearing of tanks • the removal of asbestos or other potentially harmful materials unless agreed that it is reasonable to leave such liabilities to future owners

Ref	AM requirement	Measures in place
		• methods of dismantling buildings and other structures, which gives protection of surface and groundwater • testing of the soil to ascertain the degree of any pollution caused by the activities and the need for any remediation to return the site to a satisfactory state as defined by the initial site report
4.	*You should identify non-productive or redundant items such as tanks, pipework, retaining walls, bunds, reusable waste containers, ducts, filters and security systems and implement a programme of decommissioning and removal.*	Options for identifying non-productive or redundant items such as tanks, pipework, retaining walls, bunds, reusable waste containers, ducts, filters and security systems and implement a programme of decommissioning and removal are regularly undertaken.
5.	*You should follow our guidance on how land and groundwater should be protected at permitted facilities. You should plan for producing a site condition report, if needed to surrender your permit.*	The site condition report is updated as per the EA template.

Section 3.0: Waste Pre-acceptance, Acceptance and Tracking

These are appropriate measures for waste pre-acceptance, acceptance and tracking at a regulated facility permitted to store, treat or transfer (or both) non-hazardous and inert waste.

Ref	AM requirement	Measures in place
3.1	**Waste Pre-acceptance**	
1.	*You must implement waste pre-acceptance procedures so that you know enough about a waste (including its composition) before it arrives at your facility. You need to do this to assess and confirm that the waste is technically and legally suitable for your facility. If you accept the waste, you must keep records to justify your decision. Your pre-acceptance procedures must follow a risk-based approach, considering:* • *the source and nature of the waste* • *potential risks to process safety, occupational safety and the environment (for example from odour and other emissions)* • *knowledge about the previous waste holder(s)*	The Site follows strict waste acceptance and rejection procedures ensuring that only wastes detailed in the permit are accepted and that no non-conforming waste is accepted on Site. The procedure adopted by all Site operatives is as follows. **Procurement** Recycled plastic waste from shredding of end-of-life refrigerators, WEEE, large domestic appliances and small domestic appliances will be accepted on site. The Senior Transport and Administration Manager will ensure that all deliveries are scheduled, and no unauthorised or unexpected deliveries will be allowed to offload their waste at Stafford Park. **Weighbridge** Waste will be weighed at the weighbridge, where the Weighbridge Operator will check consignment notes and issue weighbridge tickets. **Waste types and verification** Only waste detailed in the permit is accepted on Site. To ensure that only permitted waste is accepted on Site, and to verify that the deliveries originate from pre-accepted sites and contain correct material, the Weighbridge Operator will check the weighbridge tickets and Waste Transfer Notes presented to them by the driver, against their list of expected deliveries as basic

Ref	AM requirement	Measures in place
		characterisation. Furthermore, all deliveries will undergo visual checks upon their arrival to Site by trained Site Operatives. **Compliant waste** If the waste is found to be compliant, the delivery driver will be instructed to deposit the load into the correct bay, under the supervision of the Site Management or designated member of staff. Incoming, unprocessed waste will be stored in Bays 6-9. **Non-compliant waste** If any non-compliant waste arrives on site, it will be refused, and the driver informed. Furthermore, the issue will be raised with company management and the producer sites. In the event that the waste has already been deposited in the bays, the driver will be asked to remove it. If the driver has left the site, the waste will be isolated and stored in the non-complaint waste quarantine area until its removal to a suitably licenced facility can be arranged.
2.	*Some facilities receive waste on an ad hoc basis. In those instances pre-acceptance checks can still be carried out before the waste is accepted. For example, through the exchange of information at the weighbridge before acceptance on site.*	All waste inputs are pre-booked.
3.	*When you receive a customer query, and before the waste arrives at your facility, you must get enough information from the waste producer to satisfy yourself that the waste has been properly assessed and classified as set out in WM3*	The customer's requirements are confirmed by AO Recycling before acceptance, when the customer does not provide a documented statement of their requirements. AO Recycling retains documented information, as applicable; a) On the results of the review; and b) On any new requirements for the products and services
4.	*In the case of household and similar non-household waste (including skip waste) waste is pre-accepted by the terms and conditions of the contract in place (for*	Not applicable at the Site.

Ref	AM requirement	Measures in place
	example skip waste companies excluding fridges and freezers or hazardous wastes). There should also be a visual pre-acceptance check before removal from the producer's premises.	
5.	*For commercial and industrial waste you must get the following information in writing or electronic form:* • *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* • *an estimate of the quantity you expect to receive in each load and in a year* *For mirror entry LoW codes (as defined in WM3), you must keep the evidence that you have made an assessment of the waste to assign the relevant mirror entry code.*	Waste will be subject to strict waste acceptance procedures to identify, reject and/or segregate potentially non-conforming waste. • Only waste authorised by the EP will be accepted at the Site. • All wastes will be subject to inspection and checking against the declaration on the waste transfer note. If unauthorised waste is delivered to the Site, it will be segregated and stored in a designated quarantine area prior to export from Site. • Site Management responsible for implementing risk management measures in accordance with the Site's Integrated Management System (IMS), which is certified to ISO 9001, 14001 & 45001.
6.	*You do not need to have sample information if the origin of the waste is reliably understood, and it clearly shows that the waste is non-hazardous. However, a visual assessment alone will not be enough to assess whether mirror entry waste is hazardous or not.*	Only waste detailed in the permit is accepted on Site. To ensure that only permitted waste is accepted on Site, and to verify that the deliveries originate from pre-accepted sites and contain correct material, the Weighbridge Operator will check the weighbridge tickets and Waste Transfer Notes

<table>
<tr><th>Ref</th><th>AM requirement</th><th>Measures in place</th></tr>
<tr><td></td><td></td><td>presented to them by the driver, against their list of expected deliveries as basic characterisation. Furthermore, all deliveries will undergo visual checks upon their arrival to Site by trained Site Operatives.</td></tr>
<tr><td>7.</td><td>If the waste is a mirror entry and has not been properly assessed, you must assume it is the hazardous entry as a precautionary measure. This is likely to mean that you cannot accept it at your facility. The pre-acceptance information should be verified by contacting or visiting the producer. Dealing with staff directly involved in waste production can help to fully characterise a waste.</td><td>Site is authorised to accept both non-hazardous and hazardous waste streams.
<table>
<tr><th>EWC Code</th><th>Description</th></tr>
<tr><td>16</td><td>Wastes not otherwise specified in the list</td></tr>
<tr><td>16 02</td><td>wastes from electrical and electronic equipment</td></tr>
<tr><td>16 02 15*</td><td>hazardous components removed from discarded equipment - plastics from domestic and commercial appliances only</td></tr>
<tr><td>16 02 16</td><td>components removed from discarded equipment other than those mentioned in 16 02 15 – non-hazardous plastics from domestic appliances only</td></tr>
<tr><td>19</td><td>Wastes from waste management facilities, off-site wastewater treatment plants and the preparation of water intended for human consumption and water for industrial use</td></tr>
<tr><td>19 02</td><td>wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation)</td></tr>
<tr><td>19 02 04*</td><td>premixed wastes composed of at least one hazardous waste - plastics from domestic appliances only</td></tr>
<tr><td>19 10</td><td>wastes from shredding of metal-containing wastes</td></tr>
<tr><td>19 10 06</td><td>other fractions other than those mentioned in 19 10 05 - non-hazardous plastics resulting from treatment of domestic appliances only</td></tr>
<tr><td>19 12</td><td>wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified</td></tr>
<tr><td>19 12 04</td><td>plastic and rubber - non-hazardous plastics resulting from treatment of domestic appliances only</td></tr>
<tr><td>19 12 11*</td><td>other wastes (including mixtures of materials) from mechanical treatment of waste containing hazardous substances - plastics from domestic appliances only</td></tr>
</table></td></tr>
</table>

Ref	AM requirement	Measures in place
		19 12 12 — other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11- non-hazardous plastics resulting from treatment of domestic appliances only
8.	*Analysis of samples must be carried out by laboratories who are UKAS or MCERTs accredited for the prescribed test.*	Samples are despatched to accredited laboratories only.
9.	*After a waste has been properly assessed and classified, you must technically assess the waste's suitability for storage and treatment at your facility to make sure you can meet your permit conditions. You must make sure that the waste complies with your facility's treatment capabilities and you are permitted to take that waste.*	In addition to storing accepted waste on site in Bays 6-9, Bays 1-5 are dedicated to the storage of waste produced on site. Note: some waste streams are stored in Bays 6-9 as they are hazardous and may contain POPs. See for reference OP17-SP: Maintenance & control of drainage network.
10.	*You must keep pre-acceptance records for at least 3 years, with records preferably held electronically, following receipt of the waste. If an enquiry does not lead to receipt of the waste, you do not need to keep records.*	Pre-acceptance records are held electronically for at least 3 years following receipt of the waste. If an enquiry does not lead to receipt of the waste, records are not kept.
11.	*You must reassess the information required at pre-acceptance if the:* • *waste changes* • *process giving rise to the waste changes* • *waste received does not to conform to the pre-acceptance information* *In all cases you must reassess the information required at pre-acceptance on an annual basis.*	Waste information required at pre-acceptance is reassessed on an annual basis as a minimum.
12.	*When you agree that you will accept waste from a customer, you should decide and record what parameters you will check at the acceptance stage. The checks could be visual, physical, chemical and odour-based parameters. You must also record the criteria for non-conformance or rejection. The person checking the waste for acceptance can also decide on their own additional parameters.*	AO Recycling ensures that it has the ability to meet the requirements for products and services offered to customers. AO Recycling conducts a review before committing to supply products and services to a customer, to include: a) Requirements specified by customer, including the requirements for delivery and post-delivery activities; b) Requirements not stated by the customer, but necessary for the specified intended use, when known; c) Requirements specified by AO Recycling;

Ref	AM requirement	Measures in place
		d) Statutory and regulatory requirements applicable to the products and services; and e) Contract or order requirements differing from those previously expressed.
3.2	**Waste Acceptance**	
1.	*You must implement waste acceptance procedures to check that the characteristics of the waste received matches the information provided to you during waste pre-acceptance. This is to confirm the waste is as expected and that you can accept it. If the waste does not conform to the pre-acceptance information, you may still be able to accept the waste, but you must confirm first that your permit allows it and that your facility can handle it appropriately. Otherwise, you must reject the waste.*	ISO8.1, procedure 30. Recycled plastic waste from shredding of end-of-life refrigerators, WEEE, large domestic appliances and small domestic appliances is accepted on site. The Senior Transport and Administration Manager will ensure that all deliveries are scheduled, and no unauthorised or unexpected deliveries will be allowed to offload their waste at Stafford Park.
2.	*Your procedures should follow a risk-based approach, considering:* • *the source, nature and age of the waste* • *potential risks to process safety, occupational safety and the environment (for example, from odour and other emissions)* • *the potential for self-heating* • *knowledge about the previous waste holder(s)*	An essential feature of the environmental management system is a commitment to continually improving environmental performance and the prevention of pollution which involves all levels of the business from senior management to operatives.
3.	*When deciding whether to accept waste, you must also check that the relevant storage areas and treatment processes in your facility have the physical capacity needed to handle the waste. You must not accept waste if this capacity is not available, or if you would breach your permit by doing so.*	AO operates a first-in first out procedure to ensure that waste that has been stored the longest is removed first. Stockpiles will be rotated with every new waste deposit and when the waste is transferred to onsite plant for treatment. Prior to the deposit of newly processed waste within any stockpile, the existing stockpiled waste will be moved forwards (and therefore turned) to allow the new waste to be deposited at the back of the bay.
4.	*You must visually check wastes and verify them against pre-acceptance information and transfer documentation before you accept them on site. The extent of the initial visual check is based on the waste type and how it is packaged.*	To ensure that only permitted waste is accepted on Site, and to verify that the deliveries originate from pre-accepted sites and contain correct material, the Weighbridge Operator will check the weighbridge tickets and Waste Transfer Notes presented to them by the driver, against their list of expected deliveries

Ref	AM requirement	Measures in place
		as basic characterisation. Furthermore, all deliveries will undergo visual checks upon their arrival to Site by trained Site Operatives.
5.	*You must check and validate all transfer documentation and resolve discrepancies before you accept the waste. If you believe the incoming waste classification or description is incorrect or incomplete, then you must address this with the original waste producer or waste carrier (or both) during waste acceptance. You must record any non-conformance. If you have assessed the waste as acceptable for on-site storage or treatment, you must document this*	To ensure that only permitted waste is accepted on Site, and to verify that the deliveries originate from pre-accepted sites and contain correct material, the Weighbridge Operator will check the weighbridge tickets and Waste Transfer Notes presented to them by the driver, against their list of expected deliveries as basic characterisation. Furthermore, all deliveries will undergo visual checks upon their arrival to Site by trained Site Operatives.
6.	*You must have clear criteria that you use to identify non-conforming wastes and wastes to be rejected. You must also have written procedures for recording, reporting and tracking non-conforming and rejected wastes. These must include:* • *using quarantine storage* • *notifying the relevant customer or waste producer* • *recording a summary of your justification for accepting non-conforming waste in your electronic (or equivalent) system* *You must take measures to prevent the recurrence of non-conforming and rejected wastes.*	If the waste is found to be compliant, the delivery driver will be instructed to deposit the load into the correct bay, under the supervision of the Site Management or designated member of staff. Incoming, unprocessed waste will be stored in Bays 6-9. If any non-compliant waste arrives on site, it will be refused, and the driver informed. Furthermore, the issue will be raised with company management and the producer sites. In the event that the waste has already been deposited in the bays, the driver will be asked to remove it. If the driver has left the site, the waste will be isolated and stored in the non-complaint waste quarantine area until its removal to a suitably licenced facility can be arranged.
7.	*Where you reject waste which has been classified as hazardous, you must follow the procedure set out in our rejected loads guidance.*	All rejected hazardous waste will follow this guidance Hazardous waste: rejected loads guidance - GOV.UK (www.gov.uk)
8.	*You must weigh each load of waste on arrival to confirm the quantities against the accompanying paperwork, unless alternative reliable and representative systems are available (for example, based upon density and volume). You must record the weight in your electronic or equivalent systems, so you can monitor available capacity at your*	Waste will be weighed at the weighbridge, where the Weighbridge Operator will check consignment notes and issue weighbridge tickets.

Ref	AM requirement	Measures in place
	facility. Records of incoming waste are not required for waste from householders deposited at Household Waste Recycling Facilities.	
9.	*The person carrying out waste acceptance checks must be trained to effectively identify and manage any non-conformances in the loads received, so you comply with your Duty of Care for waste and your permit conditions.*	To further support the competency of all workers, the organisation maintains a training matrix that identifies all qualification, training & other requirements for various defined roles. The register is maintained by Managers in collaboration with HR/SHEQ Team and is regularly reviewed and updated to ensure workers hold all current licences, accreditation, and experience.
10.	*Your procedures must make sure that your staff watch waste being unloaded, so you can quarantine the waste if necessary before it is mixed with other material.*	All deliveries will undergo visual checks upon their arrival to Site by trained Site Operatives.
11.	*Offloading and reception areas must have an impermeable surface with self-contained drainage, to prevent any potentially polluting liquid from escaping off site. This requirement does not apply if your facility's permit allows only inert wastes and does not require impermeable surfacing with self-contained drainage.*	The storage bays will be located on impermeable surfacing and benefit from bunding and kerbing to contain leaks and spillages.
3.3	**Quarantine**	
1.	*Your facility must have a dedicated waste quarantine area or areas which you use to temporarily store waste being rejected, or non-conforming waste whilst it is being assessed. Quarantine areas must have impermeable surface with self-contained drainage if there is a risk of contaminated runoff from the quarantined waste.*	If any non-compliant waste arrives on site, it will be refused, and the driver informed. Furthermore, the issue will be raised with company management and the producer sites. In the event that the waste has already been deposited in the bays, the driver will be asked to remove it. If the driver has left the site, the waste will be isolated and stored in the non-complaint waste quarantine area until its removal to a suitably licenced facility can be arranged.
2.	*Where there is a risk of fugitive emissions from quarantined waste you must store it in closed or covered containers or within a building.*	No risk arises from fugitive emissions from quarantined waste.
3.	*Quarantine storage must be separate from all other storage and clearly marked as a quarantine area*	In the event of non-compliant waste being identified within the waste load, the vehicle will be requested to remove the load off Site immediately. If the vehicle has already unloaded the waste, it will be moved to the noncompliant waste quarantine skip and removed off Site within 72 hours.

Ref	AM requirement	Measures in place
4.	*You should store the waste in quarantine in closed containers or cover it to prevent emissions if appropriate. For example, you should sheet quarantined contaminated soil or store it in a covered skip to prevent rainfall or wind from mobilising pollutants.*	In the event of non-compliant waste being identified within the waste load, the vehicle will be requested to remove the load off Site immediately. If the vehicle has already unloaded the waste, it will be moved to the noncompliant waste quarantine skip and removed off Site within 72 hours.
5.	*You must have written procedures for dealing with wastes held in quarantine, including a maximum storage volume. The maximum storage time must take account of the potential for odour generation, pest infestation and storage conditions. If the waste is infested or odorous you must remove it within 24 hours or sooner*	*To manage wastes held in quarantine, AO have detailed written procedures that cover several key aspects:* • *Identification and Documentation: These clearly identify and document the type of waste, its source, and the reason for quarantine. This helps in tracking and managing the waste effectively.* • *Storage Conditions: Specify the storage conditions, including the maximum storage volume and duration. The maximum storage time considers potential risks such as odour and other emissions.* • *Segregation: Ensure that quarantined waste is stored separately from other waste to prevent contamination. This is achieved by using designated quarantine areas that are clearly marked.* • *Monitoring and Inspection: Regular monitoring and inspection of the quarantined waste to ensure it remains within the specified conditions. This includes checking for any signs of leakage, odour, or other issues.* • *Disposal Plan: AO has a clear plan for the disposal of quarantined waste once it is deemed safe or necessary to do so. This is contingent upon the waste type and outlet options..* • *Record Keeping: AO maintain detailed records of all quarantined waste, including the date it was quarantined, the expected disposal date, and any inspections or actions taken during the quarantine period.*
3.4	**Waste Tracking**	

Ref	AM requirement	Measures in place
1.	*You should use an electronic or equivalent system to hold up-to-date information about the available capacity of different parts of your facility, for example reception, quarantine, treatment and storage areas. If you do not have an electronic system you still need to hold the equivalent level of information. You should use a pre-booking system to make sure that you have enough waste storage and process capacity for the incoming acceptable waste.* *Your electronic or equivalent system must hold all the information generated during:* • *pre-acceptance* • *acceptance* • *non-conformance or rejection* • *storage* • *repackaging* • *treatment* • *removal off site* *This information must be readily accessible.*	AO Recycling recognises that to provide and maintain a consistently high quality in the work it undertakes, and the material it produces, an effective Quality Management System (QMS) is necessary to ensure that proper communication, work control and accountable records are generated for all work undertaken.
2.	*You must create records and update them to reflect deliveries, on-site treatment and despatches. Your tracking system will also operate as a waste inventory and stock control system, including both wastes and end-of-waste materials produced at your facility. It must include this information as a minimum:* • *the date the waste arrived on site* • *the original producer's details (or unique identifier)* • *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*	AO Recycling maintains a procedure, work instructions and records to assist in determining, providing and maintaining an up to date record of the waste held on site.

Ref	AM requirement	Measures in place
	• *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 accepting or rejecting waste streams and who have decided on recovery or disposal options* • *details that link waste to relevant transfer notes* • *details of any non-conformances and rejections, including consignment notes for waste rejected because it is hazardous*	
3.	*The electronic (or equivalent) system must be able to report for each of LoW code:* • *the total quantity of waste present on site at any one time* • *a breakdown of the waste quantities you are storing pending on-site 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 your management system and permit* • *the length of time the waste has been on site compared with the limits in your management system and permit*	The system is able to report on each LoW code.
4.	*The electronic (or equivalent) system must also be able to report the total quantity of end-of-waste materials on site at any one time, and where that material is located based on the site plan.*	*The system is also able to report the total quantity of end-of-waste materials on site at any one time, and where that material is located based on the site plan.*
5.	*You must store back-up copies of records off site. These records must be readily accessible in an emergency.*	Back up records are held in the Cloud.
6.	*You must keep acceptance records for a minimum of 2 years after you have treated the waste or removed it off site. You may have to keep records for longer if they are required for other purposes, for example hazardous waste consignment notes.*	AO Recycling maintains a procedure and supporting processes ensure the control of all aspects of document and data management. The procedure clearly defines: • How documents can be located.

Ref	AM requirement	Measures in place
		• How documents are reviewed and revised, as necessary. • Documents are authorised prior to release and are circulated to named persons or locations. • Documents that need to be retained for historical or legal purposes are clearly marked as withdrawn. • Where documents are held on computer for direct reference, any printed copy is automatically classified as 'uncontrolled'.

Section 4.0: Waste Storage

<table>
<tr><th>Ref</th><th>AM requirement</th><th>Measures in place</th></tr>
<tr><td>4.0</td><td colspan="2">Waste Storage</td></tr>
<tr><td>1.</td><td>You must have waste storage and handling procedures. You must store and handle waste in a way that makes sure you prevent and minimise pollution risks by using appropriate measures.</td><td>The mixed plastics that the Site accepts may contain Persistent Organic Pollutants (POPs). In addition, there may be some waste outputs that contain POPs.
Bays 6 - 9 are used to store these materials. Bays 6 - 9 has impermeable roofing to prevent the occurrence of run-off entering the drainage network. In addition, procedures are in place regarding handling and storage or materials, drainage protection, spill controls etc.</td></tr>
<tr><td>2.</td><td>You must store waste in locations that minimise the unnecessary handling of waste.</td><td>Storage of waste pre- and post- processing takes place on impermeable concrete surfacing within the following areas:
External Bays 1-10; and
External General Waste Skip (site generated from offices and site operatives).</td></tr>
<tr><td>3.</td><td>Waste handling must be carried out by competent staff using appropriate equipment. You must use mechanical unloading technologies where it is possible, safe and practicable to do so.</td><td>AO Recycling ensures that infrastructure required for the operation of its processes and to achieve conformity of its products and/or services is in place. The Organisation considers the following requirements:
Buildings and associated utilities
Equipment, including hardware and software
Transportation resources
Information and communication technology.</td></tr>
<tr><td>4.</td><td>Where possible, you should locate storage areas away from watercourses and sensitive perimeters, for example those close to public rights of way, housing or schools. You must store all waste within the security protected area of your facility to prevent unauthorised access and vandalism.</td><td>
<table>
<tr><th>Receptor Name</th><th>Receptor Type</th><th>Direction from Site</th><th>Approximate Distance from Site Boundary (m)</th></tr>
<tr><td colspan="4">Local receptors located within 1000m of the EP boundary as shown on Drawing 003</td></tr>
<tr><td>Stafford Park Commercial/Industrial Area</td><td>Commercial/Industrial</td><td>North, East, South and West</td><td>Adjacent</td></tr>
</table>
</td></tr>
</table>

<table>
<tr><th>Ref</th><th>AM requirement</th><th>Measures in place</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>Stafford Park 11</td><td>Local Transport Network</td><td>East</td><td>Adjacent</td></tr>
<tr><td>Railway Line</td><td>Local Transport Network</td><td>South</td><td>Adjacent</td></tr>
<tr><td>Roads</td><td>Local Transport Network</td><td>North, East, South and West</td><td>Adjacent</td></tr>
<tr><td>Open Ground</td><td>Open Ground</td><td>East</td><td>110</td></tr>
<tr><td>Agricultural Land</td><td>Agricultural</td><td>East, South</td><td>300</td></tr>
<tr><td>Surface Water Drain</td><td>Surface Water Feature</td><td>South</td><td>310</td></tr>
<tr><td>Shifnal Properties</td><td>Residential</td><td>Southeast</td><td>510</td></tr>
<tr><td>Telford Properties</td><td>Residential</td><td>West</td><td>770</td></tr>
<tr><td>Sports Court</td><td>Recreational</td><td>West</td><td>780</td></tr>
<tr><td>Priorslee Lake</td><td>Surface Water</td><td>North</td><td>790</td></tr>
<tr><td>Telford Sailing Club</td><td>Recreational</td><td>North</td><td>800</td></tr>
<tr><td>University of Wolverhampton</td><td>Educational</td><td>Northwest</td><td>830</td></tr>
<tr><td>K M Commercial Repairs</td><td>Industrial & Commercial</td><td>South</td><td>850</td></tr>
<tr><td>Sports Court</td><td>Recreational</td><td>Northwest</td><td>920</td></tr>
<tr><td>Motorway Services</td><td>Commercial</td><td>Northeast</td><td>940</td></tr>
<tr><td colspan="4">Ecology and Cultural and Natural Heritage identified within 1km of the EP boundary as shown on Drawing 003</td></tr>
<tr><td>Ancient Woodland</td><td>Ancient Woodland</td><td>East</td><td>970</td></tr>
</table>
</td></tr>
<tr><td>5.</td><td>You must clearly document in your management system the maximum storage capacity of your facility and its designated storage areas. You must regularly monitor the quantity of stored waste against the allowed maximum capacities, and not exceed them. You must define capacity in terms of, for example:
cubic metres or tonnage
numbers of skips or other containers
maximum tank or vessel capacities</td><td>
<table>
<tr><th>Identifier</th><th>Waste Type</th><th>Max Storage Time (months)</th><th>Length (m)</th><th>Width (m)</th><th>Height (m)</th><th>Maximum volume when bagged (m^3)</th><th>Maximum volume when loose (m^3)</th></tr>
<tr><td>Bay 1</td><td>Bagged Processed Plastic/ Processed Waste</td><td>3</td><td>12</td><td>9</td><td>3.8</td><td>410.4</td><td></td></tr>
<tr><td>Bay 2</td><td>Bagged Processed Plastic/ Processed Waste</td><td>3</td><td>12</td><td>9</td><td>3.8</td><td>410.4</td><td></td></tr>
<tr><td>Bay 3</td><td>Bagged Processed Plastic/</td><td>3</td><td>12</td><td>9</td><td>3.8</td><td>410.4</td><td></td></tr>
</table>
</td></tr>
</table>

<table>
<tr><th>Ref</th><th>AM requirement</th><th>Measures in place</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td></td><td>Processed Waste</td><td></td><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td>Bay 4</td><td>Bagged Processed Plastic/ Processed Waste</td><td>3</td><td>12</td><td>9</td><td>3.8</td><td>410.4</td><td></td></tr>
<tr><td>Bay 5</td><td>Bagged Processed Plastic/ Processed Waste</td><td>3</td><td>12</td><td>9</td><td>3.8</td><td>410.4</td><td></td></tr>
<tr><td>Bay 6</td><td>Loose/Bagged Unprocessed Plastic</td><td>3</td><td>12</td><td>9</td><td>3.8</td><td>410.5</td><td>281.57[3]</td></tr>
<tr><td>Bay 7</td><td>Loose/Bagged Unprocessed Plastic</td><td>3</td><td>12</td><td>9</td><td>3.8</td><td>410.5</td><td>281.57[3]</td></tr>
<tr><td>Bay 8</td><td>Loose/Bagged Unprocessed Plastic</td><td>3</td><td>12</td><td>9</td><td>3.8</td><td>410.5</td><td>281.57[3]</td></tr>
</table>
</td></tr>
<tr><td>6.</td><td>You should clearly mark all waste storage areas and provide signs indicating the type of waste stored there.</td><td>All waste storage areas are clearly marked, and signs provided indicating the type of waste stored there.</td></tr>
<tr><td>7.</td><td>You must not accumulate wastes. You must treat wastes or remove them from the site as soon as possible. You must prioritise the treatment or off-site transfer of waste based on:
its type
its age on arrival
the date of arrival
the duration of storage on site</td><td>AO operates a first-in first out procedure to ensure that waste that has been stored the longest is removed first. Stockpiles are rotated with every new waste deposit and when the waste is transferred to onsite plant for treatment. Prior to the deposit of newly processed waste within any stockpile, the existing stockpiled waste will be moved forwards (and therefore turned) to allow the new waste to be deposited at the back of the bay.</td></tr>
<tr><td>8.</td><td>Except for inert waste, you must follow the first-in-first-out principle, unless you need to prioritise more recently received wastes because they pose a higher risk of pollution.</td><td>AO operates a first-in first out procedure to ensure that waste that has been stored the longest is removed first.</td></tr>
</table>

Ref	AM requirement	Measures in place
9.	*You must minimise refuse derived fuel (RDF) and solid recovered fuel (SRF) storage durations. You must implement an auditable bale identification system so that you can remove bales in date order.*	Not applicable to the operations carried out at the Site.
10.	*You must securely wrap bales of RDF and SRF with high-density polyethylene (HDPE) membrane or equivalent. This is to prevent water entering, access by pests and odour release. You should inspect bales regularly and rewrap any that are damaged. If they are wrapped securely, you can store them outside (unless your permit forbids this). If you store bales outside, your fire prevention plan must manage the risks from solar heating during hot weather.*	Not applicable to the operations carried out at the Site.
11.	*You must thoroughly clean storage bays and containers on a regular basis to prevent the build-up of aging waste, which will be a source of odour and attract vermin*	The Site undergoes regular cleaning using mobile plant and wash down hoses/jet wash to prevent a build-up of debris and dust on Site. The results of all daily and weekly monitoring are recorded in the Site Diary, as well as any remedial actions.
12.	*All waste containers must be fit for purpose, that is:* • *in sound condition* • *not corroded, if metal* • *have well-fitting lids* • *suitable for the contents* • *with caps, valves and bungs in place and secure* *within the manufacturer's designed lifespan, particularly for plastic containers*	All waste containers are fit for purpose and are regularly inspected.
13.	*You must inspect storage areas, containers and infrastructure regularly to make sure there is no loss of containment. You must deal with any issues immediately. You must keep written records of the inspections. You must clean up and log any spillages of waste.*	Suitably qualified personnel carry out daily checks of the Site to identify the risks and inspect the stockpiles and infrastructure. This ensures that the Site does not reach a level of overcapacity in respect to storage and that there is no loss of containment.
4.1	**Segregation**	

Ref	AM requirement	Measures in place
1.	*You should keep different types of waste segregated if contamination would inhibit the recovery of the waste.*	The mixed plastics that the Site accepts may contain Persistent Organic Pollutants (POPs). In addition, there may be some waste outputs that contain POPs. Bays 6 - 9 are used to store these materials. Bays 6 - 9 has impermeable roofing to prevent the occurrence of run-off entering the drainage network. In addition, procedures are in place regarding handling and storage or materials, drainage protection, spill controls etc. An overview of these procedures is documented in OP17-SP: Maintenance & control of drainage network.
2.	*Where paper, plastic, metal or glass have been collected separately, they must not be mixed with other waste or material. This duty applies where you are required to keep wastes separate and to help with or improve waste recovery.*	*Not applicable to the operations carried out at the Site.*

Section 5.0: Waste Treatment

Ref	AM requirement	Measures in place
5.0	**Waste Treatment**	
1.	*Waste treatment must have a clear and defined benefit. You must fully understand, monitor and optimise your waste treatment process to make sure that you treat waste effectively and efficiently. The treated output material must meet your expectations and be suitable for its intended disposal or recovery route. You must identify and characterise emissions from the process and take appropriate measures to control them at source.*	AO Recycling Ltd is the recycling arm of a large online electrical appliance retailer. The organisations main activities involve the recycling of Waste Electric and Electronic Equipment (WEEE) such as refrigerators, cookers, dishwashers etc. This is set out in the WEEE directive 2012/19/EU and transposed into UK legislation – Waste Electrical and Electronic Equipment Regulations 2013.
2.	*You must prevent unwanted or unsuitable material from entering subsequent waste treatment processes.* *You must have accurate and up-to-date written details of your treatment activities and the abatement and control equipment you are using. You should include information about the characteristics of the waste to be treated and the waste treatment processes, including:* • *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 for example separation, compaction, shredding, heating, cooling or washing* • *an equipment inventory, detailing 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 (schematics)* • *the hourly processing capability of waste treatment equipment*	The audited recycling process and associated management systems have met the requirements of Recycling Process Audit Scheme Version 1.0, in line with EN 15343:2007 and has the required procedures in place in order to ensure the traceability of recycled plastics produced listed in the annex of the certificate.

Ref	AM requirement	Measures in place
	• *a summary of operating and maintenance procedures* *The extent of the information about your treatment activities will depend on the nature, scale and complexity of your facility and the range of environmental impacts it may have. It is also based on the type and amount of wastes processed.*	
3.	*You must have up-to-date written details of the measures you will take during abnormal operating conditions to make sure you continue to comply with permit conditions. Abnormal operating conditions include:* • *unexpected releases* • *start-up* • *momentary stoppages* • *shutdown*	Senior Personnel are designated as Emergency Incident Controller & Business Continuity Core Team, responsible for coordinating all emergency functions. Primary responsibilities: • Maintain a current Emergency Response Plan. • Evaluate emergency risk and develop/maintain emergency response plans and procedures. • Activate the Emergency Response Plan. • Lead the emergency response. • Inform the Business Continuity Team of the potential outage and impacts. • Receive and disseminate information about an emergency. • Prevent unauthorised entry into hazardous or secured areas. • Coordinate shutdown and start-up procedures with the appropriate personnel. • Ensure that vital records are protected from the effects of a disaster. • Follow up with appropriate notifications to governmental regulatory agencies; and • Assess the incident and make recommendations to revise the Emergency Response Plan accordingly.
5.1	**Soils and inert waste**	
1.	*Soil and aggregate washing is a physico-chemical treatment (not a separation or sorting activity) and you must categorise the outputs as set out in WM3.*	Not applicable to the operations carried out at the Site.
5.2	**Waste treatment outputs, including fines**	

Ref	AM requirement	Measures in place
1.	*You must not make assumptions about the nature of the outputs from your waste treatment processes. You must make sure that you appropriately classify the outputs following WM3 If you do not, you may breach your Duty of Care for waste and commit an offence under the Environmental Protection Act 1990.* *This is particularly important for fines arising from shredding and trommelling processes, which generally:* • *require disposal at cost* • *contain a range of contaminants* • *are likely to be subject to a mirror entry code in the LoW, for example 19 12 11* versus 19 12 12*	*When analysis report is obtained, it shall be reviewed to determine if the effluent exceeds any limits/thresholds stated in the Site's Environmental Permit and Site's Consent to Discharge.* *If the analysis results are below all limits/thresholds, the effluent can be discharged into the drainage network with a flow rate no greater than 2 m/s. Temperature and pH shall be tested prior to discharge from the discharge point to make sure that the effluent is within the boundaries stated on the Site's Consent to Discharge.* *Note: The maximum volume of trade effluent to be discharged in any continuous period of 24 hours shall not exceed 90 cubic metres.* *If analysis shows that any threshold/limit has been reached, the effluent shall be transferred to a suitably licenced site via a licenced waste carrier. The effluent will be treated according to what limits were breached.* *If POPs are found to be in the effluent, treatment shall be high temperature incineration.*
2.	*Any hazardous waste taken from your facility must be consigned following our guidance Dispose of hazardous waste.*	All hazardous waste taken from the Site will be consigned following EA guidance.
3.	*If an output is not waste, for example because end-of-waste criteria have been met, or the material has been produced in accordance with a Quality Protocol (resource framework), then you do not need to store the output within your permitted area. However, non-waste materials are still able to cause pollution, for which you remain liable. You must implement appropriate measures to prevent and minimise risks of pollution from non-waste and waste materials.*	*The Site stores non-waste materials and materials that are covered by the non-packaging plastics: quality protocol.* *They are still able to cause pollution and are considered in the FPP due to the potential for them to cause or increase the impact of a fire on the Site and also remain able to cause pollution.*
5.3	**Waste treatment for landfill**	
1.	*If you are handling or treating waste before you send it to landfill follow our guidance Dispose of waste to landfill.*	Not applicable to the operations carried out at the Site.

Section 6.0: Emissions Control

Ref	AM requirement	Measures in place
6.1	**Enclosure within buildings**	
1.	*Enclosing activities within buildings can be an appropriate measure for preventing and minimising emissions of pollution, given that an appropriately designed building will reduce a range of types of pollutants, in particular, noise, dust and odour. A partially enclosed building may be an appropriate measure on its own, or together with other appropriate measures, depending on the site-specific circumstances.*	Storage of waste pre- and post- processing takes place on impermeable concrete surfacing within the following areas: • External Bays 1-10; and • External General Waste Skip (site generated from offices and site operatives). The building benefits from a MX5 addressable 2-loop fire detection system which covers the offices, both on the ground and first floor and main factory. The factory floor, which houses the processing plant and mobile plant, has automatic fire detection with XP95 beam detectors linked to the fire alarm panel. An external company monitors the fire alarm system and will automatically alarm the fire brigade if activated outside operational hours. The alarm company will also call selected personnel from a 'cascade list'. In addition, the Site has an appropriate distribution of manually operated fire alarm call points at each fire exit. Site operatives will be trained in the detection of fires and therefore will provide an additional level of management for fire detection. In the event that a fire is noticed on the factory floor, staff will be trained to use the manually operated fire call points.
2.	*If your waste treatment activities are likely to cause (or are causing) significant pollution at sensitive receptors which cannot be addressed by alternative measures, then you must carry out that waste treatment activity within an enclosed building.*	Waste treatment is carried out entirely within the process building.

Ref	AM requirement	Measures in place
3.	*You must also carry out non-treatment activities, such as storing and transferring waste (including loading and unloading) in enclosed buildings if these activities are likely to cause (or are causing) significant pollution at sensitive receptors which cannot be addressed by alternative measures.* *An enclosed building means a construction designed to provide sheltering cover and minimise emissions of noise, particulate matter, odour and litter. It must be enclosed on all sides. Its doorways must be as small as practicable and covered with fast-acting doors which default to the closed position. You must keep its windows closed unless you need to open them for ventilation. Dirty (process contaminated) air must pass through appropriate abatement before being emitted from the building.*	The mixed plastics that the Site accepts may contain Persistent Organic Pollutants (POPs). In addition, there may be some waste outputs that contain POPs. Bays 6 - 9 are used to store these materials. Bays 6 - 9 has impermeable roofing to prevent the occurrence of run-off entering the drainage network. In addition, procedures are in place regarding handling and storage or materials, drainage protection, spill controls etc. An overview of these procedures is documented in OP17-SP: Maintenance & control of drainage network.
4.	*Material transfer and storage systems and equipment (for example conveyors, hoppers, containers and tanks) can extend outside the enclosed building so long as they are also fully enclosed.*	Bays 6 - 9 are used to store these materials. Bays 6 - 9 has impermeable roofing to prevent the occurrence of run-off entering the drainage network. In addition, procedures are in place regarding handling and storage or materials, drainage protection, spill controls etc.
5.	*You must regularly assess your enclosed building's integrity. You should consider using BS EN ISO 9972:2015 to demonstrate building containment. This method is based on fan pressurisation. You should carry out a smoke test at least annually and where potential faults in building integrity are likely to be causing pollution such as odour.*	AO Recycling ensures that infrastructure required for the operation of its processes and to achieve conformity of its products and/or services is in place. The Organisation considers the following requirements: • Buildings and associated utilities • Equipment, including hardware and software • Transportation resources • Information and communication technology.
6.	*Enclosed buildings must be ventilated to provide a safe working environment for employees. Your building's ventilation system must be properly designed and effective in order for the building to provide adequate containment and prevent fugitive emissions and unacceptable noise. The engineer designing the*	AO Recycling maintains a procedure and supporting processes to ensure that procurement processes control potential hazards and reduce Health, Safety, Environmental and Quality risks associated with products, raw materials,

Ref	AM requirement	Measures in place
	ventilation system must be appropriately qualified. To validate the size of supply points (louvers), and the volume of dirty air that needs to be extracted, the engineer must understand and consider: • *the needs of the occupants working in the building* • *heat release* • *the volume of moist gas emissions that will be generated*	substances, new equipment/machinery, services etc. being introduced into the workplace. The application of all aspects of the organisation's Integrated Management System (IMS) is rigorously assessed both internally and by external parties to ensure compliance with BS EN ISO 9001:2015 Quality Management Systems, BS EN ISO 14001:2015 Environmental Management Systems and BS ISO 45001:2018 Occupational Health and Safety Management Systems, legal and other requirements.
7.	*The air inside the enclosed building must be maintained under negative pressure, or you must install a localised extraction system that extracts dirty air from sources of pollution within the building. Sources that could potentially benefit from localised extraction include:* • *shredders and trommels* • *waste loading and unloading areas* • *odorous stockpiles*	The Site currently receives post-consumer shredded plastic waste from WEEE from AO Recycling's plant at Halesfield 15 and from third parties. Incoming mixed plastic waste is processed using a two-stage density sink/float separation process in order to remove contaminants and heavy (brominated and non-brominated) plastics. Please note that there are no changes to the currently accepted input material. The resulting ABS, PS and PP fractions are then; • transferred to granulators to reduce size to 10mm, • fed through a cyclone to remove any residual liquid, • followed by dedusting equipment to remove dust.
8.	*You must regularly assess the integrity of your building for damage that could result in fugitive emissions, including noise breakthrough. You must prevent and minimise damage by implementing a maintenance programme.*	AO Recycling ensures that infrastructure required for the operation of its processes and to achieve conformity of its products and/or services is in place. The Organisation considers the following requirements: • Buildings and associated utilities • Equipment, including hardware and software • Transportation resources • Information and communication technology.

Ref	AM requirement	Measures in place
9.	*You must implement measures to control door opening, to make sure that the engineered ventilation system works as effectively as possible. It must direct emissions to the abatement system, rather than letting them escape as fugitive emissions through doors or windows. If you use negative pressure, it must be maintained when doors are opened, and you must monitor the pressure to demonstrate its effectiveness. Additional measures to minimise fugitive emissions may be required in some cases, for example installing an airlock entry system.*	Doors are only opened to allow access/egress.
10.	*To reduce emissions of noise and vibration, the building must have an appropriate minimum surface density. You must install acoustic seals on doors and windows, following advice from an acoustic specialist.*	Site access and operational areas are maintained and repaired to minimise emissions of noise due to uneven and poor surfacing. If horns or alarms are deemed to cause unacceptably high levels of noise, alternative technologies will be explored and implemented Plant is selected and operated to minimise noise Plant is fitted with noise silencers where possible. All Site plant and machinery is operated and maintained in accordance with manufacturer's specifications. Auditory inspections are carried out daily and in response to complaints.
6.2	**Point source emissions to air (channelled emissions)**	
1.	*You must use appropriate measures to make sure that you collect, extract and direct all process emissions to an appropriate abatement system for treatment before release.* *You must identify the main chemical constituents of your facility's point source emissions as part of your inventory of emissions to air. You must include the speciation of volatile organic compounds (VOCs) if you have identified them in the inventory and it is practicable to do so. You must characterise your emissions sufficiently to make sure that your chosen abatement systems are effective.*	An H1 assessment of emissions to air has been undertaken.

Ref	AM requirement	Measures in place
2.	*You must make an assessment of the fate and impact of the substances emitted to air, following the Environment Agency's risk assessment guidance.*	An H1 assessment of emissions to air has been undertaken.
3.	*To reduce point source emissions to air (for example dust and odorous compounds) from the treatment of waste, you must use an appropriate combination of abatement techniques. Or you must demonstrate to us that your alternative abatement is equally effective. The appropriate combination of abatement techniques would include one of more of:* • *adsorption* • *biofiltration, biotrickling or bioscrubbing* • *cyclone* • *fabric filter* • *water injection (into a shredder)*	All waste processing takes place within the main building. All fines and dust generated are captured and retained by a dust extraction system within the building.
4.	*You must assess and design vent and stack locations and heights to make sure dispersion capability is adequate and noise pollution is prevented. You may need to carry out dispersion modelling to establish whether the height of the vent or stack allows emissions to disperse appropriately, preventing any impacts on receptors.*	An H1 assessment of emissions to air has been undertaken.
5.	*Where monitoring is required, including for odour, you must install suitable monitoring points which meet the sampling standard for the relevant pollutants.*	An H1 assessment of emissions to air has been undertaken.
6.	*You must have procedures to make sure that you correctly operate, monitor and maintain abatement equipment.*	An H1 assessment of emissions to air has been undertaken.
7.	*Your monitoring should demonstrate the effectiveness of the abatement, so that you can take preventative or corrective action as necessary.*	An H1 assessment of emissions to air has been undertaken.

Ref	AM requirement	Measures in place
8.	*You should implement contingency measures for abatement system down-time and for any abnormal events, for example biofilter media change. These should include suspending operations until the site is back under control or having standby abatement available.*	Coordinated shutdown and start-up procedures with the appropriate personnel.
9.	*You should design and operate abatement systems to minimise water vapour plumes.*	Not applicable.
6.3	**Fugitive emissions to air**	
1.	*You must use appropriate measures to prevent and minimise fugitive emissions to air, including dust, mud and litter, odour and noise and vibration.*	Processed wastes shall be handled and stored with due care in order to avoid release of hazardous substances into air, water, or soil, as a result of damage and/or leakage. Processed wastes which can be loaded onto trailers for removal from site shall have the following conditions followed: • Trailer curtains are kept closed until the Site is ready to load. • Trailer curtains are closed immediately after loading.
2.	*You must use your waste pre-acceptance, waste acceptance and site inspection checks and procedures to identify and manage wastes that could cause, or are causing, fugitive emissions to air. When you identify any such wastes you must:* • *take appropriate risk-assessed measures to prevent and control emissions* • *prioritise their treatment or transfer* *Where necessary to prevent fugitive emissions to air from the storage or handling of wastes, you should use a combination of the following measures:* • *use fully enclosed material transfer and storage systems and equipment outside buildings, for example conveyors, hoppers, containers, tanks and skips*	The incoming plastic waste originates from a metal shredding process and may contain residual amounts of fine material. Waste will arrive within sheeted or enclosed vehicles if possible to ensure no escape of dust during transit. Wastes will be stored in dedicated external storage bays. The main treatment building benefits from roller action doors which will be kept closed when movements of waste are not taking place. All waste processing will take place within the main building. All fines and dust generated will be captured and retained by a dust extraction system within the building.

Ref	AM requirement	Measures in place
	• *store and handle the waste within a suitably enclosed area (for example bays), a building or enclosed building* • *keep doors closed except when access is required* • *keep enclosed buildings and equipment under adequate negative pressure with an appropriate abated air circulation or extraction system, locating air extraction points close to potential emission sources* • *use fast-acting or 'airlock' doors that default to closed*	
3.	*You must have an appropriate, regular maintenance programme covering all buildings, plant and equipment. It must help prevent emissions or minimise them. Your maintenance programme must include:* • *a leak detection and repair programme to promptly identify and mitigate any fugitive emissions of organic compounds from treatment plant and associated infrastructure (for example, pipework, conveyors or tanks)* • *regular inspection and cleaning of all waste storage and treatment areas and equipment (including conveyor belts) to avoid large scale contamination activities* • *preventing plant and equipment from corroding (for example, conveyors or pipes) – including selecting and using appropriate construction materials, and lining or coating equipment with corrosion inhibitors*	AO Recycling ensures that infrastructure required for the operation of its processes and to achieve conformity of its products and/or services is in place. The Organisation considers the following requirements: • Buildings and associated utilities • Equipment, including hardware and software • Transportation resources • Information and communication technology.
4.	*You should monitor and log weather conditions – temperature, wind speed and direction, and describe any precipitation (for example none, drizzle, heavy rain, snow). You can use this information to identify when dispersion conditions are poor (that is, periods of warm, calm weather with wind blowing towards sensitive receptors). You can also use it to inform decisions to implement additional short-*	Weather conditions are monitored.

Ref	AM requirement	Measures in place
	term pollution control contingency measures. If you have a weather station you should position it carefully, for example not placing it in between buildings. There is guidance in the World Meteorological Organization's Guide to Meteorological Instruments and Methods of Observation.	
5.	*Relying on dispersion and wind direction to minimise pollution at sensitive receptors must be a last resort and you must not use it instead of measures that prevent and reduce pollution at source.*	The Site is located within an area of industrial properties. The nearest residential receptors are 510m southeast of the Site. Using dispersion and wind direction to minimise pollution at sensitive receptors is not relied as extrusion will only be carried out within the main processing building. The main treatment building benefits from roller action doors which will be kept closed when extrusion takes place. Extruded pellets are not dusty in nature and will be stored in bulk bags.
6.3	**Fugitive emissions to air – Other measures for dust, mud and litter**	
6.	*If your activities are likely to produce dust and particulates, mud or litter that could cause pollution at sensitive receptors, or if such pollution has been substantiated, you must implement and regularly review a dust, mud and litter management plan. You must do this following our guidance. Your dust, mud and litter management plan must explain how you will prevent and minimise emissions of dust, mud and litter from your facility*	The Site is located within an area of industrial properties. The nearest residential receptors are 510m southeast of the Site. Using dispersion and wind direction to minimise pollution at sensitive receptors is not relied as extrusion will only be carried out within the main processing building. The main treatment building benefits from roller action doors which will be kept closed when extrusion takes place. Extruded pellets are not dusty in nature and will be stored in bulk bags.
7.	*Measures such as litter fencing and micro-netting should be located as close as possible to areas where you load and unload light-weight loose waste, if this activity is done outdoors. You should not rely on fences and screens at the perimeter of your facility to stop litter escaping.*	Processed wastes shall be handled and stored with due care in order to avoid release of hazardous substances into air, water, or soil, as a result of damage and/or leakage. Processed wastes which can be loaded onto trailers for removal from site shall have the following conditions followed:

Ref	AM requirement	Measures in place
		• Trailer curtains are kept closed until the Site is ready to load. • Trailer curtains are closed immediately after loading.
8.	*Measures such as mist sprays should be located as close as possible to point source emissions of dust, for example at conveyors, trommels, shredders, and at building entrances – except where this would increase odour from biodegradable waste.* *If measures such as using hoses and road sweepers do not prevent mud escaping onto the public highway, you must take further measures and you must consider installing a high-pressure wheel wash. Regardless of the measures you use, you must make sure that you minimise water consumption, and that contaminated water does not escape from your facility, unless you can lawfully discharge it.*	Waste accepted on Site will consist only of mixed plastics with a negligible quantity of other contaminants. The waste will not contain any odorous materials. All waste accepted on Site will be pre-treated. Incoming waste material is stored in dedicated external bays before treatment within the main processing building The main processing building benefits from roller shutter doors that remain closed except when waste is being transferred to and from the building; Waste handling is kept to a minimum. Strict waste acceptance procedures are adhered to, to ensure only permitted wastes are accepted on Site. If odorous waste is delivered to Site it will be segregated and removed at the earliest opportunity. It will then be re-loaded into the delivery vehicle or loaded into a sealable container. The Site will be monitored for odours by Site personnel throughout each shift. If odours are detected, investigations will be undertaken to determine the cause and appropriate remedial action taken.
6.3	**Fugitive emissions to air – Other measures for odour**	
9.	*If your activities are likely to produce odour pollution at sensitive receptors, or such pollution has been substantiated, you must implement and regularly review an odour management plan following our guidance, which includes H4 Odour management. Your odour management plan must explain how you will prevent and minimise odorous emissions from your facility.*	Waste accepted on Site will consist only of mixed plastics with a negligible quantity of other contaminants. The waste will not contain any odorous materials. All waste accepted on Site will be pre-treated. Incoming waste material is stored in dedicated external bays before treatment within the main processing building The main processing building benefits from roller shutter doors that remain closed except when waste is being transferred to and from the building;

Ref	AM requirement	Measures in place
		Waste handling is kept to a minimum. Strict waste acceptance procedures are adhered to, to ensure only permitted wastes are accepted on Site. If odorous waste is delivered to Site it will be segregated and removed at the earliest opportunity. It will then be re-loaded into the delivery vehicle or loaded into a sealable container. The Site will be monitored for odours by Site personnel throughout each shift. If odours are detected, investigations will be undertaken to determine the cause and appropriate remedial action taken.
10.	*You must reject waste that is highly odorous as part of your pre-acceptance and waste acceptance procedures. This is unless you can handle and treat these wastes within an enclosed building with appropriate odour control measures, including extraction via odour abatement. Otherwise, you should talk to the waste supplier to stop it happening again. You should avoid receiving aged waste, for example by refusing to accept waste from other transfer stations that do not have strict inventory controls and documented holding times.*	If odorous waste is delivered to Site it will be segregated and removed at the earliest opportunity. It will then be re-loaded into the delivery vehicle or loaded into a sealable container.
11.	*You must make sure that odorous waste arrives at and leaves your facility in covered or enclosed vehicles. Mesh covers are not adequate to control odour. You should minimise how long potentially odorous waste is kept at your facility, in particular under anaerobic conditions. Making smaller stockpiles increases natural aeration, reducing the risk of anaerobic biodegradation which can cause odour.*	If odorous waste is delivered to Site it will be segregated and removed at the earliest opportunity. It will then be re-loaded into the delivery vehicle or loaded into a sealable container.
12.	*You should wash empty vehicles before they leave your facility, to remove any residues which may be or become odorous. You must make sure the run-off from this process is contained and lawfully discharged.*	Waste accepted on Site will consist only of mixed plastics with a negligible quantity of other contaminants. The waste will not contain any odorous materials.

Ref	AM requirement	Measures in place
13.	*You should not allow contaminated liquids to pool for long periods of time, as they can be a source of odour. If you do not have a drainage system inside the building that can collect the leachate or dirty water, then you will need other appropriate measures. You should take action to avoid ponding or pooling. Industrial vacuum cleaners can be used to suck up liquids. You should clean any spillages immediately.*	*Processed wastes which have the potential to contain Persistent Organic Pollutants (POPs) shall be stored in Bays 7-10 in bagged form.* *Other processed wastes shall be stored in Bays 1-6 in bagged form.* *The storage bays are located:* • *on impermeable surfacing and benefit from bunding and kerbing to contain leaks and spillages.* • *Provided with spillage collection facilities relevant to the type of waste stored* *Bays 7-10 have an impermeable covering to prevent the occurrence of run-off into the drainage network. All wastes which have the potential to contain Persistent Organic Pollutants (POPs) will need to be stored within these bays.* *Therefore, the following wastes shall be stored within these bays:* • *Incoming raw material wastes* • *Heavies waste (in-process waste output)* • *Sludge waste (in-process waste output)* • *Dust waste (in-process waste output)* *The Site has a Topographic gradient of 3-5% in a S-E direction. Under normal circumstances surface water would not enter the bays.* *In the event of a heavy rain/flood scenario, AO have the following controls to prevent contamination of surface water from wastes stored within bays 7-10:* • *Regular monitoring of bays to check surface water has not entered bays.* • *Temporary bunding, using spillage collection facilities located onsite.* *Bags shall be undamaged and be in a condition to prevent emissions which give rise to an adverse environmental impact.* *Damaged bags shall be repaired promptly.*

Ref	AM requirement	Measures in place
14.	*You must cover odorous or potentially odorous waters or liquids or keep them in enclosed tanks or containers.*	If odorous waste is delivered to Site it will be segregated and removed at the earliest opportunity. It will then be re-loaded into the delivery vehicle or loaded into a sealable container.
15.	*Using masking agents (for example dry nano systems, ozone systems and ionisation systems) is a way of attempting to disguise an odour problem. If you understand and process wastes efficiently then you will not need to use masking agents. We do not consider this technology an appropriate measure.*	Masking agents are not used on site.
6.3	**Fugitive emissions to air – Other measures for noise and vibration**	
16.	*If your activities are likely to produce noise or vibration pollution at sensitive receptors, or such pollution has been substantiated, you must implement and regularly review a noise and vibration management plan. Follow our guidance H3 part 2 noise assessment and control. Your noise and vibration management plan must explain how you will prevent and minimise emissions of noise and vibration from your facility.*	The Site is located within an area dominated by industrial/commercial premises. There are no residential receptors within 500m of the Site. All treatment of waste takes place within the main processing building. Vehicle movements are restricted to operations within the daytime period. Speed limits will be implemented for vehicles using the Site and traffic calming measures will be implemented to enforce speed limits. Site access and operational areas are maintained and repaired to minimise emissions of noise due to uneven and poor surfacing. If horns or alarms are deemed to cause unacceptably high levels of noise, alternative technologies will be explored and implemented Plant is selected and operated to minimise noise Plant will be fitted with noise silencers where possible. All Site plant and machinery is operated and maintained in accordance with manufacturer's specifications. Auditory inspections will be carried out daily and in response to complaints.
17.	*For noise, your noise and vibration management plan must be informed by a noise impact assessment carried out following the methodology of BS*	Not applicable.

<table>
<tr><th>Ref</th><th>AM requirement</th><th>Measures in place</th></tr>
<tr><td></td><td>4142:2014+A1:2019 ‘Methods for rating and assessing industrial and commercial sound’.</td><td></td></tr>
<tr><td>18.</td><td>For vibration, your noise and vibration management plan must be informed by a vibration impact assessment carried out following the methodology of BS 6472-1:2008 ‘Guide to evaluation of human exposure to vibration in buildings. Vibration sources other than blasting’.</td><td>Not applicable.</td></tr>
<tr><td>6.4</td><td colspan="2">Point source emissions to water (including sewer)</td></tr>
<tr><td>1.</td><td>You must identify the main chemical constituents of your facility’s point source emissions to water and sewer as part of your inventory of emissions.</td><td>At the laboratory, the samples will be analysed for the following Persistent Organic Pollutants (POPs):
<table>
<tr><th>CAS Number</th><th>Name</th><th>Limit of Detection</th></tr>
<tr><td>40088-47-9 and others</td><td>Tetrabromodiphenyl ether $C_{12}H_6Br_4O$</td><td rowspan="5">0.004 µg/l for Deca bromodiphenyl ether</td></tr>
<tr><td>32534-81-9 and others</td><td>Pentabromodiphenyl ether $C_{12}H_5Br_5O$</td></tr>
<tr><td>36483-60-0 and others</td><td>Hexabromodiphenyl ether $C_{12}H_4Br_6O$</td></tr>
<tr><td>68928-80-3 and others</td><td>Heptabromodiphenyl ether $C_{12}H_3Br_7O$</td></tr>
<tr><td>1163-19-5 and others</td><td>Decabromodiphenyl ether $C_{12}Br_{10}O$</td></tr>
</table>
In addition, the following shall be analysed:
Tetrabromobisphenol A</td></tr>
</table>

Ref	AM requirement	Measures in place
		• Antimony • The COD from acidified dichromate expressed as O. • Phosphorus • Copper • Zinc • Oil • pH • Temperature
2.	*You must assess the fate and impact of the substances emitted to water and sewer following the Environment Agency's risk assessment guidance.*	If analysis shows that any threshold/limit has been reached, the effluent shall be transferred to a suitably licenced site via a licenced waste carrier. The effluent will be treated according to what limits were breached. If POPs are found to be in the effluent, treatment shall be high temperature incineration.
3.	*Discharges to water or sewer must comply with the conditions of an environmental permit and a trade effluent consent.*	If the analysis results are below all limits/thresholds, the effluent can be discharged into the drainage network with a flow rate no greater than 2 m/s. Temperature and pH shall be tested prior to discharge from the discharge point to make sure that the effluent is within the boundaries stated on the Site's Consent to Discharge. If analysis shows that any threshold/limit has been reached, the effluent shall be transferred to a suitably licenced site via a licenced waste carrier. The effluent will be treated according to what limits were breached. If POPs are found to be in the effluent, treatment shall be high temperature incineration.
4.	*Relevant sources of waste water include:* • *runoff from all waste storage and handling areas, including loading and unloading areas* • *process water* • *condensate collected from treatment process*	Wastewater is not treated on site.

Ref	AM requirement	Measures in place
	• *waste compactor runoff* • *vehicle washing* • *washing of containers and vessels* • *soil washing effluent* • *vehicle oil and fuel leaks* • *spills and leaks* • *rainwater from bunds around containers and tanks* *If you need to treat waste water before discharge or disposal, you must use appropriate treatment techniques. An appropriate combination of treatment techniques, for example, could include silt or solids removal and using an oil separator to manage site drainage.*	
5.	*You must segregate uncontaminated water streams (for example clean runoff from roofs) from those that require treatment.*	Uncontaminated water streams (for example clean runoff from roofs) are kept separate from those that require disposal.
6.	*You must separate contaminated water streams based on pollutant content and treatment required. For example, you may need to collect and treat separately contaminated surface runoff water and process water.*	The mixed plastics that the Site accepts may contain Persistent Organic Pollutants (POPs). In addition, there may be some waste outputs that contain POPs. Bays 6 - 9 are used to store these materials. Bays 6 - 9 has impermeable roofing to prevent the occurrence of run-off entering the drainage network. In addition, procedures are in place regarding handling and storage or materials, drainage protection, spill controls etc. An overview of these procedures is documented in OP17-SP: Maintenance & control of drainage network.
6.5	**Fugitive emissions to land and water**	
1.	*You must use appropriate measures to control potential fugitive emissions and make sure that they do not cause pollution. See the guidance on emissions to water and leaks from containers.*	All waste is stored and treated on impermeable surfacing within the main processing building and external storage yard. Due to the nature of the waste to be accepted and the operations on Site, there is no contaminated run off generated under normal operating conditions.

Ref	AM requirement	Measures in place
		The site drainage system comprises two strands: a foul drainage and surface water drainage. A penstock valve is used to contain firewater entering the foul drainage system. The surface water drainage system contains an underground retention chamber with an oil interceptor. The oil interceptor enables the removal of sediment and oil from the water. Additionally, the retention chamber provides containment for any dirty runoff and benefits from a valve which can be closed to prevent water leaving the site. This has the dual benefit of preventing contaminated water running to surface water receptors, and also ensuring firewater pools on site for reuse by the Fire Service. Site operatives are trained in the use of the valve.
2.	*You must design appropriate surfacing and containment or drainage facilities for all operational areas, taking into account:* • *collection capacities* • *surface thicknesses* • *strength and reinforcement* • *falls* • *materials of construction* • *permeability* • *resistance to chemical attack* • *inspection and maintenance procedures* • *relevant standards of construction* • *end use, for example by tracked or wheeled vehicles or vehicle weight*	AO Recycling maintains design and development procedure and associated processes to manage the design and development of new products, services and processes. The following aspects of the design and development process are considered: • Identification and evaluation of need for new products, services and processes; • Planning – determining the stages, resources and controls required; • Inputs – identifying the requirements essential in realising new product, service, process; • Controls – to ensure results to be achieved are defined, verification activities, validation activities; • Outputs – which meet input requirements and are adequate; • Changes – either during process or after, are identified, reviewed and controlled and do not impact on conformity to requirements. AO Recycling retain documented information on all aspects of the design and development process.

Ref	AM requirement	Measures in place
3.	*Your drainage infrastructure must:* • *prevent incompatible wastes coming into contact with each other* • *make sure that fire cannot spread*	The mixed plastics that the Site accepts may contain Persistent Organic Pollutants (POPs). In addition, there may be some waste outputs that contain POPs. Bays 6 - 9 are used to store these materials. Bays 6 - 9 has impermeable roofing to prevent the occurrence of run-off entering the drainage network. In addition, procedures are in place regarding handling and storage or materials, drainage protection, spill controls etc. An overview of these procedures is documented in OP17-SP: Maintenance & control of drainage network.
4.	*You must store and treat all waste on an impermeable surface with contained drainage that meets CIRIA 736 or an equivalent approved standard. The impermeable surfaces must have sealed construction joints. These requirements do not apply in designated areas where the waste being stored or handled does not pose any significant risk of contaminating surface water or ground water. You must appropriately isolate these designated areas from other operational areas so that there cannot be any flows between them. This includes in the event of an accident, for example a fire.*	Storage of waste pre- and post- processing takes place on impermeable concrete surfacing within the following areas: • External Bays 1-10; and • External General Waste Skip (site generated from offices and site operatives).
5.	*You must provide bunds for all tanks containing liquids (whether waste or otherwise) that could be harmful to the environment if spilled. Bunds must meet CIRIA 736 or an equivalent approved standard and:* • *be impermeable, stable and resistant to the stored materials* • *have no outlet (that is, no drains or taps) and drain to a blind collection point* • *have pipework routed within bunded areas with no penetration of contained surfaces* • *be designed to catch leaks from tanks or fittings*	The storage bays will be located on impermeable surfacing and benefit from bunding and kerbing to contain leaks and spillages. The bays have been designed to ensure that the storage volumes are compliant with FPP guidance. The water tank and external sludge dewatering tank also benefit from bunding to contain any leaks or spillages. Each bund is capable of containing at least 110% of the volume of the tank within the bund. Bunds are impermeable and resistant to stored materials.

Ref	AM requirement	Measures in place
	• *have an appropriate capacity* • *have regular visual inspections – any contents must be pumped out or otherwise removed under manual control after checking for contamination* • *be fitted with a high level probe and an alarm (as appropriate) if not frequently inspected* • *have tanker connection points within the bund (where possible), and if not possible you must provide adequate containment for spillages or leakage* • *have programmed engineering inspections (extending to water testing if structural integrity is in doubt)* • *be emptied of rainwater regularly to maintain the containment capacity*	
6.	*All above-ground tanks containing liquids (whether waste or otherwise) that could be harmful to the environment if spilled must be kept on an impermeable surface with contained drainage that meets CIRIA 736 or an equivalent approved standard. You must fit the tanks with alarms and cut-out systems to detect and prevent leaks and spills.*	Diesel fuel storage tank will have an integral bund capable of containing 110% of the tank capacity Containers used for the storage of other process liquids and maintenance oil, will be stored over drip trays or within a bunded area bund capable of containing at least 110% of the volume of the largest container within the bund or 25% of the total tank volume within the bund, whichever is the greater Drip trays/bunds will be inspected visually on a regular basis by the Site staff to ensure the continued integrity of the drip trays/bunds and identify the requirement for any remedial action.
7.	*You must minimise using subsurface equipment and infrastructure and decommission it where possible. For subsurface structures, you must:* • *establish and record the routing of all site drains and subsurface pipework* • *identify all subsurface sumps and storage vessels* • *engineer systems to minimise leakages from pipes and make sure they can be detected quickly if they do occur*	Not applicable.

Ref	AM requirement	Measures in place
	• *provide secondary containment or leakage detection for subsurface pipework, sumps and storage vessels – vessels must be fitted with alarms and cut-out systems to detect and prevent spills when filling* • *establish an inspection and maintenance programme for all subsurface structures, for example, pressure tests, leak tests, material thickness checks or CCTV*	
8.	*You must provide secondary containment that meets CIRIA 736, or an equivalent approved standard, for all drums and other mobile containers which:* • *are greater than 200 litres in capacity and are kept outside* • *contain liquids (waste or otherwise) that could be harmful to the environment if spilled*	Diesel is stored externally in a 2,500l bunded fuel tank. Containers used for the storage of other process liquids and maintenance oil, will be stored over drip trays or within a bunded area bund capable of containing at least 110% of the volume of the largest container within the bund or 25% of the total tank volume within the bund, whichever is the greater.
9.	*You must comply with the oil storage regulations. These apply to non-hazardous wastes such as vegetable and cooking oil, as well as to biofuels and mineral oils.*	Diesel is stored externally in a 2,500l bunded fuel tank in a store compliant with the Oil Storage Regulations.
10.	*You must provide appropriate buffer storage capacity at your facility to store waste waters, taking into account:* • *potential abnormal operating scenarios and incidents* • *the nature of any polluting substances and their impact on the downstream waste water treatment plant and receiving environment* *You must have appropriate measures to monitor, treat and reuse the water held in the buffer storage before discharging.*	The Site slopes slightly with the highest point being the entrance/exit on the eastern boundary. Run-off will therefore pool in the centre and west of the Site. This is further demonstrated on Drawing 004 which shows the drainage of the site running from the east to the west. Considering the kerbing and sloping, the Site can contain 2,076.852m^3 10 (2,076,852 litres) of water. As a secondary means of containment, any firewater not temporarily stored within the waste storage bunding will be contained here.
11.	*You must take appropriate measures to prevent emissions from washing and cleaning activities, including:* • *containing and directing spray, liquid effluent and wash-waters to foul sewer or collecting them in a sealed system for offsite disposal – you must not discharge them to surface or storm drains*	In the event of a major spillage immediate action will be taken to contain the spillage and prevent liquid from entering surface water drains and the unsurfaced ground. The spillage will be cleared immediately and placed in containers for off-site disposal and the EA will be notified.

Ref	AM requirement	Measures in place
	• *where possible, using biodegradable and noncorrosive washing and cleaning products* • *storing all detergents, emulsifiers and other cleaning agents in suitable bunded or containment facilities, within a locked storage area, or in a building away from any surface water drains* • *preparing cleaning or disinfection solutions in contained areas of the site and never in areas that drain to the surface water system or groundwater*	The main processing building benefits from impermeable surfacing throughout and all runoff will be contained within the confines of the building. The Site will undergo regular cleaning using mobile plant and wash down hoses/jet wash to prevent a build-up of debris and dust on Site. The results of all daily and weekly monitoring will be recorded in the Site Diary, as well as any remedial actions. The site drainage system comprises two strands: a foul drainage and surface water drainage. A penstock valve is used to contain firewater entering the foul drainage system. The surface water drainage system contains an underground retention chamber with an oil interceptor. The oil interceptor enables the removal of sediment and oil from the water. Additionally, the retention chamber provides containment for any dirty runoff and benefits from a valve which can be closed to prevent water leaving the site.
12.	*You must produce and implement a spillage response plan and train staff to follow it and test it.*	Head of Department, Operations, Plant, Department Managers make sure staff at all levels receive appropriate training. Co-ordinators, Supervisors, Team Leaders make sure there is at least 1 trained spills response person on their Team at all times.
13.	*Your procedures and associated training must make sure you deal with spillages immediately. You should follow the manufacturer's health and safety advice for any products or substances involved.*	AO Recycling maintains a procedure and associated processes to identify potential for emergency situations and incidents that can impact on health, safety, the environment, or quality of the services associated with its operations. Emergency Response and Business Continuity Plans have been developed and maintained for a variety of scenarios for the site. Scenarios considered, but are not limited to: • Medical emergencies and First Aid • Fire and Evacuation • Explosion • Bomb Threat

Ref	AM requirement	Measures in place
		• Adverse Weather • Spill/Release of Hazardous Substance(s) The plans and associated procedures aid in the control of emergency situations and to overcome any consequential environmental impacts etc. In addition, emergency conditions are identified within operating procedures. All Emergency Preparedness & Response Plans are periodically tested and reviewed.
14.	*You must keep spill kits at locations close to areas where a spillage could occur and make sure relevant staff know how to use them. You must make sure kits are replenished after use.*	Co-ordinators, Supervisors, Team Leaders make sure spill kits are checked monthly and stocked fully.
15.	*You must stop spillages from entering drains, channels, gullies, watercourses and unmade ground. You must make available proprietary sorbent materials, sand, booms or drain mats for use when required.*	Materials suitable for absorbing and containing minor spillages will be maintained on Site. Minor spillages will be cleaned up immediately, using sand or proprietary absorbent to clean up liquids and placed in alternative containers. Site staff will undertake daily monitoring for evidence of spillage and leakage. In the event of a major spillage immediate action will be taken to contain the spillage and prevent liquid from entering surface water drains and the unsurfaced ground. The spillage will be cleared immediately and placed in containers for off-site disposal and the EA will be notified.
16.	*You must make sure your spillage response plan includes information about how to recover, handle and correctly dispose of waste produced from a spillage.*	Place used absorbents in disposal bags, seal in a container and mark with contents. Dispose of in accordance with regulations for the liquid absorbed.
17.	*You must have a documented inspection and maintenance programme for impermeable surfaces and containment facilities and keep records to demonstrate its implementation.*	AO Recycling identifies, plans, and implements control measures to ensure the quality, safety, environmental integrity of its processes is not compromised. A variety of operational controls employed by the organisation include, but are not limited to: • Hazard identification and Risk Assessments

Ref	AM requirement	Measures in place
		• Job safety analysis (JSA) • Work instructions • Daily pre-user checks • Housekeeping activities • Consultation and participation of employees • Risk and Legal registers, Aspects, and Impacts Register • Inspection and maintenance programmes • Permits-to-Work
6.6	**Pests**	
1.	*You must manage waste in a way that prevents pests. For example, if you do not manage flies, rats and birds they can affect operations, be a nuisance to neighbours and pose an environmental and health hazard as a potential vector for pathogens. We have produced internal guidance for our officers on fly management. Contact us if you would like a copy.*	Not applicable to the operations carried out at the Site.
2.	*If you expect pests will cause pollution, hazard or annoyance at sensitive receptors, or if this has been substantiated, you must create, use and regularly review a pest management plan, following our guidance.*	Not applicable to the operations carried out at the Site.
3.	*Your pest management plan must include procedures for:* • *inspecting for and controlling pests* • *rejecting loads of infested waste* • *treating pest infestations promptly, and removing waste if necessary* • *storing, handling and using approved pest control products – you can get information on using chemicals at work from the Health and Safety Executive*	Not applicable to the operations carried out at the Site.

Section 7.0: Emissions Monitoring and Limits

Ref	AM requirement	Measures in place
7.1	**Emissions to air**	
1.	*Your facility's emissions inventory must include information about the relevant characteristics of point source emissions to air, such as the:* • *average values and variability of flow and temperature* • *average and peak concentration and load values of relevant substances and their variability* • *presence of other substances that may affect the waste gas treatment system or plant safety, for example, oxygen, nitrogen, water vapour and dust* *Guidance on monitoring stack emissions is available.*	Analysis and H1 assessment undertaken. ELVs are not exceeded.
2.	*You must monitor fugitive emissions of dust and particulates if they are likely to cause pollution at sensitive receptors, or if this has been substantiated. There is guidance on developing monitoring strategies for assessing levels of pollutants in the ambient atmosphere and monitoring particulate matter in ambient air around waste facilities.*	Analysis and H1 assessment undertaken. ELVs are not exceeded.
3.	*You must describe your monitoring programme in your dust management plan. Visual monitoring is not effective for assessing the risk of emissions of fine particulates, for example PM_{10}. You should use dust and particulate monitors with trigger alarms instead.* *You should set alarm trigger levels to alert site staff when short-term particulate concentrations are elevated, so that you can review site practices or increase your mitigation measures. When combined with weather data, dust and particulate monitors can also provide evidence to demonstrate that your facility is not the cause of complaints. You should use a particulate limit of 75 µg/m^3 to100*	Analysis and H1 assessment undertaken. ELVs are not exceeded.

Ref	AM requirement	Measures in place
	µg/m³ (over a 5-minute average) for PM_{10} as an initial trigger for action and reduce this after the system has been in place for some time.	
7.2	**Medium combustion plant directive**	
1.	*If you operate medium combustion plant or specified generators you must monitor your emissions following the Environment Agency guidance on Monitoring stack emissions: low risk MCPs and specified generators and maintain a record of the type and quantity of fuel used in the plant.*	Not applicable to the operations carried out at the Site.
2.	*If you have a generator that uses natural gas, for example in a boiler, you must comply with the specified generator regulations.*	Not applicable to the operations carried out at the Site.
3.	*You must keep periods of start-up and shut-down for medium combustion plant and specified generators to a minimum. You must notify the Environment Agency of newly installed combustion units before start-up.*	Not applicable to the operations carried out at the Site.
4.	*You must notify the Environment Agency at least 14 days in advance of any planned changes to the medium combustion plant or generator which could affect compliance with any emission limits that apply, this includes notifying us of any significant upgrades.*	Not applicable to the operations carried out at the Site.
7.3	**Emissions to water and sewer**	
1.	*Your facility's emissions inventory must include information about the relevant characteristics of point source emissions to water or sewer, such as:* • *average values and variability of flow, pH and conductivity* • *average concentration and load values of relevant substances and their variability, for example, chemical oxygen demand (COD) and total organic carbon (TOC), metals, priority substances or micropollutants*	

Ref	AM requirement	Measures in place
	• *data on bio-eliminability, for example, biochemical oxygen demand (BOD), BOD to COD ratio, biological inhibition potential (for example, inhibition of activated sludge)*	
2.	*For relevant emissions to water or sewer identified by the emissions inventory, you must monitor key process parameters (for example, waste water flow, pH, temperature, conductivity or BOD) at appropriate locations. For example, these could either be at the:* • *inlet or outlet (or both) of the pre-treatment* • *inlet to the final treatment* • *point where the emission leaves the facility boundary*	The large holding tank of collected effluent due to be discharged must be thoroughly mixed using the circulation pumps present on site. Firstly, water storage tanks 1 & 2 tanks are isolated along with the 20 m^3 water storage tank. This is done by closing V/V 3 and V/V 2 and opening V/V 1. Then closing 20m^3 water storage tank ball valve and water storage tank 1 ball valve and opening water storage tank 2 ball valve. This then creates a recirculation line. The total volume of the three tanks is 80 m^3. Then the two pumps fitted on the recirculation line are switched on to recirculate the effluent. Each pump has a flow rate of 200 litres/min, therefore 400 litres of effluent per minute is recirculated. To form a homogeneous mixture in the tanks, the pump shall recirculate the effluent for a minimum of 4 hours, as this is the length of time required to fully circulate the contents of the holding tanks. Once thoroughly mixed, a sample of 5 litres shall be taken from the top of tank 1 (whilst the pumps are still running). The 5-litre sample is manually agitated then decanted into x3 1litre sample bottles provided by an accredited laboratory. The process is then repeated for the top of tank 2. The bottom samples are taken by firstly switching off the recirculation pumps, closing V/V 1 and closing water storage tank 2 ball valve. Then the recirculation line is drained by opening the Effluent Sample Discharge Point Ball Valve. (The water is collected and retained using a suitable receptacle and will be put back into the water system after sampling is completed).

Ref	AM requirement	Measures in place
		Then the Effluent sample discharge point is closed and WST 1 Ball Valve is opened. Next effluent sample discharge point ball valve is opened and after and after flushing the line for approx.10 seconds, a 5-litre sample is collected. Discharge sampling point ball valve is immediately closed, then WST 1 ball valve is closed. Note: 'flushed' water is retained, then re-introduced back into the water system after sampling is completed. The 5-litre sample is manually agitated then decanted into x3 1litre sample bottles provided by an accredited laboratory. For the tank 2 sample, the effluent sampling discharge point ball valve is again opened to drain the line (The water is collected and retained using a suitable receptacle and will be put back into the water system after sampling is completed). Then the Effluent sample discharge point is closed and WST 2 Ball Valve is opened. Next effluent sample discharge point ball valve is opened and after flushing the line for approx.10 seconds, a 5-litre sample is collected. Discharge sampling point ball valve is immediately closed, then WST 1 ball valve is closed. Again 'flushed' water is retained, then re-introduced back into the water system after sampling is completed. The 5-litre sample is manually agitated then decanted into x3 1litre sample bottles provided by an accredited laboratory.

Section 8.0: Process Efficiency Appropriate Measures

Ref	AM requirement	Measures in place
8.1	**Energy efficiency (installations only)**	
1.	*You must create and implement an energy efficiency plan at your facility. This must:* • *define and calculate the specific energy consumption of the activity (or activities) you carry out and waste stream(s) you treat* • *set annual key performance indicators, for example specific energy consumption (expressed in kWh/tonne of waste processed)* • *plan periodic improvement targets and related actions*	AO Recycling maintains a procedure and work instructions to support the identification of environmental aspects of its activities and services that it can control and those it can influence in order to determine those that can have significant impact(s) on the environment. Environmental aspects and impacts are identified and analysed for significance in a register of Environmental Aspects and Impacts. AO Recycling plan and implement active monitoring, measurement, analysis, and improvement processes to demonstrate product conformity and to ensure conformity with, and improvement to, the Integrated Management System and the organisational policies and objectives. The organisation maintains a procedure and associated processes to ensure: • What requires measuring and monitoring. • The methods for monitoring, measuring, analysis and evaluation are applicable to ensure valid results. • When monitoring and measuring is to be performed. • How the results from monitoring and measuring are to be analysed and evaluated. • Plant and equipment that needs to be calibrated. • The effectiveness of IMS implementation. • Meaningful communication of performance with interested parties.
2.	*You must regularly review and update your energy efficiency plan as part of your facility's management system.*	AO Recycling maintains procedures and supporting processes for evaluating compliance with legal and other requirements. This is facilitated by the SHEQ Team and is achieved by a program of internal and external reviews/audits.

Ref	AM requirement	Measures in place
		AO Recycling analyses and evaluates appropriate data and information arising from monitoring and measurement. The results of analysis are used to evaluate: • Conformity of products and services • The degree of customer satisfaction • The performance and effectiveness of the IMS • If planning has been implemented effectively • The effectiveness of actions taken to address risks and opportunities • The performance of external providers • The need for improvements to the IMS.
3.	*You must have and maintain an energy balance record for your facility. This must provide a breakdown of your energy consumption and generation (including any energy or heat exported) by the type of source (electricity, gas, conventional liquid fuels, conventional solid fuels, and waste). You should provide Sankey diagrams or energy balances to show how energy is used in your waste treatment processes.*	An updated energy balance record for the facility has been commissioned.
4.	*You must regularly review and update your energy balance record as part of your facility's management system, alongside the energy efficiency plan.*	An updated energy balance record for the facility has been commissioned.
5.	*You must have operating, maintenance and housekeeping measures in relevant areas, for example:* • *air conditioning, process refrigeration and cooling systems (leaks, seals, temperature control, evaporator or condenser maintenance)* • *the operation of motors and drives* • *compressed gas systems (leaks, procedures for use) steam distribution systems (leaks, traps, insulation)* • *space heating and hot water systems*	AO Recycling plan and implement active monitoring, measurement, analysis, and improvement processes to demonstrate product conformity and to ensure conformity with, and improvement to, the Integrated Management System and the organisational policies and objectives. The organisation maintains a procedure and associated processes to ensure: • What requires measuring and monitoring. • The methods for monitoring, measuring, analysis and evaluation are applicable to ensure valid results. • When monitoring and measuring is to be performed.

Ref	AM requirement	Measures in place
	• *lubrication to avoid high friction losses* • *boiler operation and maintenance, for example, optimising excess air* • *other maintenance relevant to the activities within the facility*	• How the results from monitoring and measuring are to be analysed and evaluated. • Plant and equipment that needs to be calibrated. • The effectiveness of IMS implementation. • Meaningful communication of performance with interested parties.
6.	*You must have measures in place to avoid gross energy inefficiencies. These should include for example:* • *insulation* • *containment methods (such as seals and self-closing doors)* • *avoiding unnecessary discharge of heated water or air (for example, by fitting simple control systems such as timers and sensors)*	Measures in place include; • Using energy-efficient appliances and equipment that consume less power. • Implementing smart energy management systems that optimize energy use based on real-time data. • Encouraging energy-saving habits among individuals, such as turning off lights when not in use and unplugging devices.
7.	*You should implement additional energy efficiency measures at the facility as appropriate, following our guidance.*	AO Recycling maintains procedures and associated processes to identify and address opportunities for addressing incidents, opportunities for improvements, non-conformance and preventative actions associated with its activities.
8.2	**Raw Materials (Installations only)**	
1.	*You must maintain a list of the raw materials used at your facility and their properties. This includes auxiliary materials and other substances that could have an environmental impact.*	AO Recycling maintains a procedure and supporting processes to ensure that procurement processes control potential hazards and reduce Health, Safety, Environmental and Quality risks associated with products, raw materials, substances, new equipment/machinery, services etc. being introduced into the workplace.
2.	*You must regularly review the availability of alternative raw materials and use any suitable ones that are less hazardous or polluting. This should include, where possible, substituting raw materials with waste or waste-derived products.*	The only materials used in the process are calcium carbonate and a surfactant (see attached SDS). Regular reviews of the availability and suitability of alternative raw materials are undertaken to investigate the potential for the use of materials that are less

Ref	AM requirement	Measures in place
		hazardous or polluting. This includes, where possible, the substitution of raw materials with waste or waste-derived products.
3.	*You must justify the continued use of any substance for which there is a less hazardous alternative.*	The only materials used in the process are calcium carbonate and a surfactant (see attached SDS).
4.	*You must have quality assurance procedures to control the content of raw materials.*	*AO Recycling maintains a procedure and supporting processes to ensure that procurement processes control potential hazards and reduce Health, Safety, Environmental and Quality risks associated with products, raw materials, substances, new equipment/machinery, services etc. being introduced into the workplace.*
8.3	**Water use (Installations only)**	
1.	*You must take measures to make sure you optimise water consumption to:* • *reduce the volume of wastewater generated* • *prevent or, where that is not practicable, reduce emissions to soil and water*	Water use is optimised wherever possible.
2.	*Measures you must take include:* • *implementing a water saving plan (involving establishing water efficiency objectives, flow diagrams and water mass balances)* • *optimising the use of washing water (for example, dry cleaning instead of hosing down, using trigger control on all washing equipment)* • *recirculating and reusing water streams within the plant or facility, if necessary after treatment* • *reducing the use of water for vacuum generation (for example, using liquid ring pumps with high boiling point liquids) where relevant*	Water use is optimised wherever possible using the following methods; • Encouraging water-saving habits in staff; • Conducting regular water audits to identify areas of excessive use and potential leaks • Optimising the use of washing water

Ref	AM requirement	Measures in place
3.	*You must carry out a regular review of water use (a water efficiency audit) at least every 4 years.*	*Regular review of water use (a water efficiency audit) is undertaken at least every 4 years.*
4.	*You must also:* • *produce flow diagrams and water mass balances for your activities* • *establish water efficiency objectives and identify constraints on reducing water use beyond a certain level (usually this will be site specific)* • *identify the opportunities for maximising the reuse, and minimising the use of water* • *have a timetabled improvement plan for implementing additional water reduction measures*	An updated water efficiency plan for the facility has been commissioned.
5.	*To reduce emissions to water, you should apply these general principles in sequence:* • *use water efficient techniques at source where possible* • *reuse water within the process by treating it first if necessary – if this is not practicable, use it in another part of the process or facility that has a lower water quality requirement* • *if you cannot use uncontaminated roof and surface water in the process, you should keep it separate from other discharge streams – at least until after you have treated the contaminated streams in an effluent treatment system and have carried out final monitoring*	An updated water efficiency plan for the facility has been commissioned.
6.	*You should establish the water quality requirements associated with each activity and identify whether you can substitute water from recycled sources. Where you can, include it in your improvement plan.*	An updated water efficiency plan for the facility has been commissioned.

Ref	AM requirement	Measures in place
7.	*Where there is scope for reuse (possibly after some form of treatment) you should keep less contaminated water streams, such as cooling waters, separate from more contaminated streams.*	An updated water efficiency plan for the facility has been commissioned.
8.	*You must minimise the volume of water you use for cleaning and washing down by:* • *vacuuming, scraping or mopping in preference to hosing down* • *reusing wash water (or recycled water) where practicable* • *using trigger controls on all hoses, hand lances and washing equipment*	An updated water efficiency plan for the facility has been commissioned.
9.	*You must directly measure freshwater consumption and record it regularly at every significant usage point, ideally every day.*	An updated water efficiency plan for the facility has been commissioned.

Section 9.0: Waste Minimisation, Recovery and Disposal

Ref	AM requirement	Measures in place
9.0	**Waste minimisation, recovery and disposal**	
1.	*You must have and implement a residues management plan that:* • *minimises the generation of residues, that is solid waste arising from the treatment of waste* • *optimises the reuse, regeneration, recycling or energy recovery of residues, including packaging* • *makes sure you properly dispose of residues where recovery is technically or economically impractical*	AO Recycling ensures that outputs that do not conform to their requirements are identified and controlled to prevent their unintended use or delivery. AO Recycling takes appropriate action based on the nature of the nonconformity and its effect on the conformity of products and services. This also applies to nonconforming products and services detected after delivery of products, during or after the provision of services. AO Recycling deals with nonconforming outputs in one or more of the following ways: • Correction; • Segregation, containment, return or suspension of provision of products and services; • Informing the customer; and • Obtaining authorisation for acceptance under concession. Conformity to the requirements are verified when nonconforming outputs are corrected. AO Recycling retains documented information that: • Describes the nonconformity; • Describes the action taken; • Describes any concessions obtained; and • Identifies the authority deciding the action in respect of the nonconformity.

Ref	AM requirement	Measures in place
2.	*Where you must dispose of waste, you must carry out a detailed assessment identifying the best environmental options for waste disposal.* *You must review on a regular basis options for recovering and disposing of waste produced at the facility. You must do this as part of your management system to make sure that you are still using the best environmental options and promoting the recovery of waste where technically and economically viable.*	

Appendix A: Recycling Process Certificate

RecyClass

RECYCLING PROCESS CERTIFICATE

AO Recycling Limited

Address: Stafford Park 11, Telford, TF3 3A
Country: United Kingdom
Registration office address: AO Park, 5a The Parklands,
BL6 4SD, Bolton,
Country: United Kingdom

The audited recycling process and associated management systems have met the requirements of Recycling Process Audit Scheme Version 1.0, in line with EN 15343:2007 and has the required procedures in place in order to ensure the traceability of recycled plastics produced listed in the annex of this certificate.
Certification compliant with EN 15343:2007.

Certification Module: General
Type of audit: Initial
Chain of custody model: Segregation
Traceability level: 1
Process overview: Granulation and washing to create flake
Input Plastic waste: PS & PP
Type and source of waste: Post consumer – WEEE from waste electronic and electrical equipment
Recycled Output: PS & PP Flake
Pre-processed waste outputs: None

Audit Report and Certificate Code:
RP057-AOR-07-24-CIR-PC

Date of the audit:
18/07/2023

Period of validity*:
18/07/2023 to 17/07/2024

**Validity conditions and terms of use may be found in the Audit Scheme documents.*

CERTIFIED BY:

Name of the auditor
Peter Coe

Certification Body name Cirrus Environmental and Planning Consultancy Limited

Address
9 Well Cross, Edith Weston,
Oakham, Rutland, LE15
8HG United Kingdom

CIRRUS

Certificate of Compliance Version 1.0
RecyClass - Avenue de Broqueville 12, 1150 Brussels - Belgium - Phone : +32 2 315 24 60 - info@recyclass.eu - www.recyclass.eu

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