

CONNINGBROOK BALLAST HOLE

Environmental Permit Application

Operating Techniques

Prepared for: Brett Aggregates Limited

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Drawing 003	Environmental Site Setting
Drawing CON/187	Proposed Restoration Contours

APPENDICES

Appendix B2_1	IMS Summary (QHEST Manual Contents)
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1.0 Introduction

Brett Aggregates Limited (Brett) has instructed SLR Consulting Limited (SLR) to prepare an Environmental Permit (EP) application under the Environmental Permitting (England and Wales) Regulations 2016 (as amended) for approval for the use of waste in the restoration of a 'ballast hole' (arising from historic removal of sand and gravel) near to the Conningbrook Recycling Facility (Ref: XP3394VP) owned and previously operated by Brett. Herein the facility will be referred to as 'the Site'.

This Operating Techniques (OT) document sets out best practice for operating the site, based on legislation and best available techniques in the industry.

The OT will be reviewed and updated on an annual basis or because of any of the following activities (list not exhaustive):

- The issue of an EP variation by the Environment Agency (EA);
- A material change to the operational process;
- A substantiated complaint; or
- Any changes in legislation or guidance documents applicable to the Conningbrook Ballast Hole Site.

This OT document is supplemented by the following documents submitted with the EP application for Conningbrook Ballast Hole:

- Associated Drawings including: Site Location Plan, Environmental Permit Boundary, Environmental Site Setting and Proposed Restoration Contours;
- An Environmental Setting and Site Design report (ESSD);
- Waste Acceptance Criteria and Waste Acceptance Procedure (WAC and WAP) document;
- An Environmental Risk Assessment (ERA);
- A Site Condition Report (SCR);
- A Dust Management Plan (DMP); and
- Waste Recovery Plan (WRP);

1.1 Report Structure

This report describes the operating techniques that will be implemented at the facility to ensure compliance with the conditions of the EP. The report is divided into the following sections.

- **Section 1** Introduction
- **Section 2** Management
- **Section 3** Accident Management
- **Section 4** Operations
- **Section 5** Emissions and Monitoring
- **Section 6** Information

1.2 Site Setting

Conningbrook is located to the northeast of Ashford and northwest of Junction 10 of the M20 in the county of Kent. The Site is accessed via Willesborough Lane, approximately 200m to the southwest. The National Grid Reference for the Site is TR 02929 43897.

The Site is located within the existing Conningbrook Quarry complex, now being decommissioned, close to the former mineral processing area and areas of historic mineral extraction, at the location shown on Drawing 001. Directly to the north is a railway line and beyond is agricultural and open ground. To the east is the now decommissioned Conningbrook Recycling Facility and beyond lie areas of Conningbrook Lakes Country Park and the River Great Stour. Open ground is located directly to the south and beyond is the Julie Rose Stadium and the A2070. To the west of the site is the railway and A2070 with areas of open ground. Beyond to the west is residential properties within Ashford.

The surrounding land uses and local receptors within 500m are identified on Drawing 003, Environmental Site Setting, in addition to the cultural and natural heritage within 1km.

A summary of the site's immediate surrounding land uses is identified in Table 1-1 below.

Table 1-1
Surrounding Land Uses

Boundary	Description
North	A railway directly to the north, beyond which lies areas of agricultural/open land.
East	The Conningbrook Quarry Complex containing the now decommissioned Conningbrook Recycling Facility is to the east. Beyond this lies the Conningbrook Lakes Country Park which is currently undergoing development to construct residential properties and recreational facilities.
South	An area of open ground directly to the south, beyond which is the Julie Rose Stadium and the A2070.
West	The railway and the A2070 lie to the west followed by areas open ground and beyond is residential properties within Ashford.

2.0 Management

2.1 Management System

The activities to be carried out at the Site will be managed and operated in accordance with the Brett Integrated Management System (IMS) known as QHEST (Quality, Health, Environment, Safety Together) which combines the requirements for quality, occupational health, environment and safety into one comprehensive set of procedures. The management system is certified to the following standards:

- BS EN ISO14001:2015, Environmental management systems;
- BS EN ISO9001:2015, Quality management systems;
- BS OHSAS18001: 2007, Occupational health and safety management systems – Specification;
- QSRMC Quality and Product Conformity Regulations 2017 (EN 206-1); and
- BES 6001 Issue 2 Responsible Sourcing of Construction Products.

The management systems will therefore ensure that:

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

A summary of the QHEST management system is enclosed as Appendix B2_1. These documents include:

- Introduction to the QHEST system;
- Brett Group Procedures;
- Brett Aggregates Procedures; and
- QHEST Guidance Notes.

The QHEST IMS is subject to continual review in response to significant changes to the activities, accidents or non-compliance. A copy of the QHEST IMS will be available for inspection on Site.

The QHEST procedures and guidance notes applicable to the Site, are specified below and summarised in Appendix B2_1.

2.1.1 Management Structure and Responsibilities

Structure, responsibilities and resources will be in accordance with the following QHEST procedure:

- BG2.1 Structure, Responsibilities and Resources.

2.2 Technical Competence and Training

The Site will be managed by sufficient staff who are competent to operate the Site without causing pollution.

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

Training will be undertaken in accordance with the following QHEST procedures and forms:

- BG2.2 Training, Awareness and Competence;
- Form BG2.2a Training Evaluation Form; and
- Form BG2.2b Training Request Form (for training requests initiated by the individual recipient).

2.3 Display of Environmental Permit

A copy of the EP will be kept available for reference by all staff and contractors whose work may have an impact on the environment.

2.4 Managing Documentation and Records

Controls will be in place to ensure that all documents are issued, revised and maintained in a consistent fashion in accordance with the following QHEST procedure and forms:

- BG2.4 Document Control;
- Form BG2.4a Site-Specific Procedures List; and
- Form BG2.4b Site Specific Controlled Documents List.

Records will be maintained in accordance with the following QHEST procedure and related forms:

- BG2.5 Records and Records Management;
- Form BG2.5a QHEST forms; and
- Form BG2.5b Site Specific Forms.

2.5 Reporting Non-Compliance and Taking Corrective Action

Procedures will ensure appropriate corrective action is taken in response to problems identified at the Site. The procedures will ensure that non-conformances are reported, investigated and rectified, and that failures and weaknesses are prevented.

A number of QHEST procedures will be in place to implement the necessary action including:

- BG4.1 Monitoring and Inspection;
- BG6.1 QHEST Audit Procedure;
- BG5.2 Reporting and Investigation of Accident, Incident and Complaint;
- BG6.2 Non-Conformance, Corrective and Preventative Action;
- Form BG6.2a Corrective Action Report Form;
- BA 1 WI 01 Geotechnical Assessment, Appraisal and Inspection; and
- Form BA 1i Site Inspection Checklists.

2.6 Auditing and Legal Compliance

There will be a formalised internal auditing programme to ensure the facility is audited at defined intervals and that the progress of corrective and preventative action is monitored in accordance with the following QHEST procedures and forms:

- BG6.1 QHEST Audit Procedure;
- Form BG6.1a QHEST Audit Report; and

- Form BG6.1b Audit Checklist.

2.7 Monitoring, Measuring and Reviewing Environmental Performance

A formalised management structure will review environmental performance, and ensure any necessary actions are taken in accordance with:

- BG4.1 Monitoring and Inspection; and
- BG6.3 QHEST Management Review.

2.8 Operational Control, Preventative Maintenance and Calibration

The QHEST IMS will ensure effective control of operations, the use of approved suppliers and contract services, the maintenance of operational equipment and the calibration of monitoring equipment.

All plant and equipment will be subject to a programme of Planned Preventative Maintenance (PPM) which will follow the inspection and maintenance schedule recommended by the manufacturer.

Relevant procedures and forms include:

- BG1.8 Management of Construction and Engineering
- BG1.9 Control of Purchasing;
- BG3.1 Permit to Work and Permission to Proceed;
- BG3.46 Control of Contractors;
- Form BG3.46a Contractors Inspection Form;
- BG4.1 Monitoring and Inspection;
- BG4.2 Plant and Equipment Maintenance;
- BG4.3 Instrument and Equipment Calibration;
- GN14 Authorising Contractors; and
- GN16 Guidelines for Contractors Inductions.

3.0 Accident Management Plan

Brett recognises the importance of the prevention of accidents that may have environmental consequences and that it is crucial to limit those consequences. As part of the QHEST IMS Brett has developed a system to identify, assess and minimise the environmental risks and hazards of accidents and their consequences in accordance with:

- BG1.3 QHEST Risk Assessment;
- BG1.4 Hazardous Substance Risk Assessment (COSHH);
- BG5.1 Emergency Preparedness and Response;
- BG5.2 Reporting and Investigation of Accident, Incident and Complaint;
- Form BG5.2a Group Incident Report Form;
- BG5.3 Near Miss Reporting; and
- Form BG5.3a Near Miss Report.

3.1 Hazard Identification

The following environmental hazards have been identified:

- Unauthorised waste receipt and processing;
- Fire;
- Loss of containment - spillage and leakage;
- Security and vandalism; and
- Flooding.

Actions that will be taken to minimise specific risks are detailed below.

3.1.1 Unauthorised Waste

Acceptance of unauthorised materials could result in unacceptable wastes being present at the site. Emissions may be unacceptable with consequences dependent on the nature of the waste.

Control of waste acceptance will be in accordance with the following procedures and work instructions, in addition to the specific WAC and WAP document submitted with this application:

- BG4.1 Monitoring and Inspection;
- BA40 WI01 Pre-Approval of Customer Waste Enquires;
- BA40 WI02 Acceptance of Non-Pre-Approved Loads at Landfill, Recovery & Recycling Sites
- BA40 WI04 Acceptance of Non-Pre-Approved Loads (i.e. at the gates) at recycling Sites.
- BA40 WI05 Waste Sampling and Validation Testing;
- BA40 WI06 Responding to Non-compliant Test Data:
- BA40 WI07 Load rejection and Dealing with Non-Compliant Waste;
- Form BA40a Allocated Waste Acceptance Roles and Responsibilities
- Form BA40c Waste Enquiry Form;

- Form BA40d Site Visit Report
- Form BA40e Example Quote Letter;
- Form BA40f Load Rejection Form;
- Form BA40g Customer Declaration Form;
- Form BA40h Analysis Request Form;
- Form BA40i Example Non-Compliant Waste Letter;
- Form BA40j Pre-Approval List (example);
- Form BA40k Monthly PAK Marker Testing Log
- BA41 Duty of Care Audits; and
- Form BA41a Duty of Care Checks.

3.1.2 Fire

As part of the QHEST IMS a number of procedures have been developed to prevent and minimise the potential impact of fire.

- BG1.3 QHEST Risk Assessment;
- BG1.15 Fire and Explosion Management;
- BG3.19 Inspection, Testing and Maintenance of Electrical Equipment;
- BG3.42 Use of Fixed Electrical Equipment, Fixed Electrical Installations and Portable Electrical Equipment;
- BG4.2 Plant and Equipment Maintenance;
- GN8 Hot Work; and
- GN21 Working with Electricity.

3.1.3 Loss of Containment – Spillage and Leakage

Loss of containment could lead to spillage and leakage of potentially contaminating liquids. There will be no fuel or oil tanks stored within the proposed EP boundary. To minimise the risk and impact of releases a number of QHEST IMS Procedures have been developed as follows:

- BG3.5 Refuelling of Plant / Vehicles on Site; and
- BG4.2 Plant and Equipment Maintenance.

3.1.4 Security and Vandalism

To maintain security at the site the following QHEST procedures will be followed:

- BG1.13 Design Security into Buildings and Plant;
- BG3.46 Control of Contractors;
- Form BG3.46a Contractors Inspection Form;
- BG3.34 Brett Site Security;
- GN42 Guidelines for Employees Encountering Unauthorised Individuals on Site;

- GN43 Guidelines for Vacant Property Security; and
- GN44 Guidelines for CCTV Selection and Management.

3.1.5 Flooding

There are no surface water features within the Site boundary.

According to the EA flood map for planning service¹ the Site lies within Flood Zone 1 and therefore, the Site has a low probability of flooding.

In the event that an accident occurs, or additional risks are identified, the Site Manager is responsible for carrying out an investigation to determine the cause and implementing remedial action prior to logging this in the Site Diary.

¹ Flood Map for Planning <https://flood-map-for-planning.service.gov.uk>, accessed August 2019

4.0 Operations

4.1 General Management

The satisfactory control, operation and management of the site in accordance with the EP will be achieved by operating in accordance with:

- BA12 Control and Operation of Landfill and Recovery Facilities (Deposits of Waste);
- BA12 WI 01 Work Instruction for Discharging Vehicle at the Site; and
- BA5 Creation and Maintenance of Stockpiles.

4.2 Waste Acceptance

Waste acceptance will be governed by the WAC and WAP document (SLR Ref: 416.01009.000228/WAC&WAP) in addition to the QHEST IMS procedures, forms and guidelines contained in the following sections.

4.2.1 Means of Measurement

The quantity of waste accepted and dispatched from the Site will be measured by a weighbridge in accordance with QHEST IMS procedure:

- BA7 Operation of a Weighbridge; and
- BA15 Operation of Brett Recycling Facility.

4.2.2 Waste Acceptance and Control

Waste acceptance and control will be governed by the specific WAC and WAP document submitted with this application (Ref: 416.01009.00228/WAP).

4.3 Plant and Equipment

All items of plant and equipment will be maintained in accordance with QHEST IMS procedures:

- BG3.18 Rules for Site Vehicles and Mobile Plant;
- BG4.1 Monitoring and Inspection;
- BG4.2 Plant and Equipment Maintenance; and
- BG4.3 Equipment and Instrument Calibration.

5.0 Emissions and Monitoring

5.1 Point Source and Fugitive Emissions

There will be no point source emissions to air, surface water or groundwater from the activities at Site.

Monitoring and management of potential fugitive emissions will be undertaken in accordance with the following QHEST IMS procedures:

- BG4.1 Monitoring and Inspection;
- BG4.2 Plant and Equipment Maintenance; and
- BG4.3 Instrument and Equipment Calibration.

The Site will be designed and operated to prevent fugitive emissions to surface water and groundwater. Strict waste acceptance procedures outlined in Section 4.2 will minimise the risk of accepting non-compliant waste.

5.2 Odour

Due to the nature of the waste that will be accepted at the Site odour is not expected to be a problem. Operations at the Site will be undertaken in accordance with procedures which will ensure that any problems associated with odours will be identified, and appropriate remedial and corrective action will be implemented in accordance with QHEST IMS procedures:

- BG3.8 Housekeeping, Litter, Pest and Vermin Control;
- BG4.1 Monitoring and Inspection; and
- BG5.2 Reporting and Investigation of Accident, Incident and Complaint.

5.3 Dust

Implementation of the following QHEST IMS Procedures will minimise the emissions of dust from the Site:

- Dust Management Plan (SLR Ref: 416.01009.00228/DMP);
- BG3.7 Traffic Management;
- BG3.8 Housekeeping, Litter, Pest and Vermin Control;
- BG4.1 Monitoring and Inspection;
- BG5.2 Reporting and Investigation of Accident, Incident and Complaint; and
- BA5 Creation and Maintenance of Stockpiles.

5.4 Noise

Implementation of the following QHEST IMS Procedures will minimise the emissions of noise from the Site:

- BG3.7 Traffic Management;
- BG3.14 Noise Control;
- BG4.1 Monitoring and Inspection;
- BG5.2 Reporting and Investigation of Accident, Incident and Complaint; and
- GN20 Traffic Management.

5.5 Pests

Implementation of the following QHEST IMS Procedures will minimise the risks of pest and vermin infestation:

- BG3.8 Housekeeping, Litter, Pest and Vermin Control;
- BG4.1 Monitoring and Inspection; and
- BG5.2 Reporting and Investigation of Accident, Incident and Complaint.

5.6 Litter

Implementation of the following QHEST IMS Procedures will minimise the emissions of litter from the Site:

- BG3.8 Housekeeping, Litter, Pest and Vermin Control;
- BG4.1 Monitoring and Inspection; and
- BG5.2 Reporting and Investigation of Accident, Incident and Complaint.

5.7 Mud and Debris

Implementation of the following QHEST IMS Procedures will minimise the emissions of mud and debris from the Site:

- BG4.1 Monitoring and Inspection;
- BG3.7 Traffic Management;
- BG5.2 Reporting and Investigation of Accident, Incident and Complaint; and
- BG4.1 Monitoring and Inspection.

6.0 Information

All relevant notifications and submissions to the EA regarding the Site will be made in writing and quote the EP reference number and the name of the EP holder.

Records will be maintained for at least 6 years, however in the case of off-site environmental effects, and matters which affect the condition of land and groundwater, the records are to be kept until permit surrender.

Duty of Care records will be kept for a minimum of 2 years.

6.1 Reporting and Notifications

6.1.1 Changes in Technically Competent Persons

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

6.1.2 Waste Types and Quantities

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

6.1.3 Relevant Convictions

The EA will be notified of the following events:

- Brett Aggregates Limited being convicted of any relevant offence; and
- Any appeal against a conviction for a relevant offence and the results of such an appeal.

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

The EA will be notified of the following:

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

6.1.5 Adverse Effects

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

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

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