# Environmental Management System (EMS)

**Bespoke Mobile Plant Permit for: Land spreading of waste based upon SR2010 No.4**

## Version Control

| Version | Date | Revision Details / Summary of Changes | Author | Approved by |
|---|---|---|---|---|
| **V1.0** | 29/05/2017 | First Issue | FGS Organics Earthcare Technical Ltd | A Noonan |
| **V2.0** | 19/11/2024 | Updated | FGS Organics | R Bacon<br>A Noonan |
| **V 3.0** | 26/05/2025 | Addition of waste codes | Earthcare Technical Ltd | R Bacon |

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# 1. INTRODUCTION

## 1.1 General

1.1.1 This Environmental Management System (EMS) has been written on behalf of FGS Organics Ltd., Stanford Bridge Farm, Station Road, Pluckley, Kent, TN27 0RU who hold a Bespoke Mobile Plant permit (Ref: EPR/BB3603XR/A001) to support an application to vary the permit to a bespoke SR2010 No.4 permit. This version of the EMS considers the addition of three waste codes to that which are allowed under Standard Rules SR2010No4.

1.1.2 The activities associated with the additional permit rules sets, included within BB3603XR/A001 from SR2010 No5, SR2010 No6 and SR2010 No11, are removed from this version of the EMS.

1.1.3 A copy of the current permit is provided as **Appendix 1** to this EMS.

1.1.4 The EMS is a live document written to describe activities covered under the SR2010 No 4 Rules set but incorporating bespoke requirements given additional waste codes.

1.1.5 The MPP requires the Operator to manage and operate the activity in accordance with a written Management System that identifies and minimises risks of pollution including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention as a result of complaints; and using sufficient competent person and resources.

1.1.6 Additionally, the Environment Agency (EA) has published Environmental Permitting Guidance to help Operators understand the conditions or rules of the Permit. It describes the standards and measures that must be used to control the most common risks of pollution from the activity. The EA stipulate that an Operator must read and understand the following digital guidance notes with the Permit:

- Develop a management system: environmental permits[1]

[1] https://www.gov.uk/guidance/develop-a-management-system-environmental-permits

- Control and monitor emissions for your environmental permit[2]
- Landspreading: how to comply with your permit[3]
- Landspreading: apply to deploy mobile plant[4]
- Landspreading: benefits and risks of the waste types you can use[5]
- Landspreading: provide a waste and receiving soil analysis[6]
- Landspreading to improve/ manage soil health[7]

1.1.7 This EMS is therefore written in accordance with the most relevant EA guidance as stated above.

## 1.2 Bespoke Mobile Plant Permit (MPP)

1.2.1 The Bespoke mobile plant for land-spreading authorises the operator to operate mobile plant for landspreading. The mobile plant shall be used for land treatment activities on notified agricultural or non - agricultural land in England and Wales that result in benefit to agriculture or ecological improvement.

1.2.2 The MPP authorises the recovery of waste to land and not disposal. The relevant R code is R10 as specified in the Waste Framework Directive. It is therefore essential to provide evidence to the EA that the operation is recovery and not disposal. Recovery is justified

[2] https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit

[3] https://www.gov.uk/government/publications/landspreading-how-to-comply-with-your-permit/landspreading-how-to-comply-with-your-environmental-permit

[4] https://www.gov.uk/government/publications/landspreading-apply-to-deploy-mobile-plant

[5] https://www.gov.uk/guidance/landspreading-benefits-and-risks-of-the-waste-types-you-can-use

[6] https://www.gov.uk/government/publications/landspreading-apply-to-deploy-mobile-plant/landspreading-provide-a-waste-and-receiving-soil-analysis

[7] https://www.gov.uk/government/publications/landspreading-how-to-manage-soil-health/landspreading-how-to-manage-soil-health

via submission of the specific deployment form and the associated benefit statement which must be approved by the EA prior to the landspreading operation commencing.

1.2.3 The MPP authorises the Operator to use the following technology and associated plant necessary for treatment and associated storage.

- plant for the storage and mixing (not for treatment) of permitted wastes listed in tables 2.2A List A wastes and 2.2B List B wastes; and
- Plant for the spreading of wastes in order to carry out treatment of land.

1.2.4 The MPP only authorises these activities if they are not carried out within:

- 10 metres of any watercourse.
- groundwater Source Protection Zone 1, or if a Source Protection Zone has not been defined then within 50 metres of any well or spring, or borehole used for the supply of water for human consumption including from a private water supply or supplies.

1.2.5 The Operator shall submit a deployment form for assessment to the EA and await an issue document agreeing that the activity may be carried out, prior to the activity commencing.

1.2.6 Additionally, the MPP guidance specifies that the operator must comply with other relevant regulations and requirements such as:

- Nitrate Pollution Regulations – if the land is in a nitrate vulnerable zone - Using nitrogen fertilisers in nitrate vulnerable zones and Storing organic manures in nitrate vulnerable zones
- Reduction and Prevention of Agricultural Diffuse Pollution Regulations (the farming rules for water) –Rules for farmers and land managers to prevent water pollution.
- Environment Protection Act –the waste duty of care requirements given in rule 2.2 of this guidance must be met.
- Animal By-Products Regulations (ABPR)

1.2.7 The Bespoke MPP specifies a number of rules which must be complied with. These are structured under the following sections within the permit:

- Management
- Operations
- Emissions and Monitoring
- Information

1.2.8 This EMS is therefore structured in a similar way to enable cross reference from each permit rule or condition.

1.2.9 The Operator has an Environmental Policy Statement, which is available on request.

# 2. MOBILE PLANT INFORMATION

## 2.1 Site Location and Description

2.1.1 Head office address is FGS Organics Ltd, Stanford Bridge Farm, Station Road, Pluckley, Ashford, Kent, TN27 0RU. The sites to which material is applied are located on land distributed across England and Wales identified on the relevant deployment application.

2.1.2 All areas of land to be treated are identified on the location maps submitted with each deployment. The map contains the following information:

- Field name/ number;
- Size of area being treated (excluding buffer zones, woodland or land that will not be spread for another reason);
- 12 figure national grid reference at centre of each field

# 3. MANAGEMENT

## 3.1 General Management

3.1.1 FGS Organics Ltd have day-to day control over their operations and operate the activities in accordance with this EMS and the MPP, using sufficient competent persons and resources.

3.1.2 Operating Techniques refer to the technical standards cited within the EA guidance notes mentioned in 1.1.4.

3.1.3 Records demonstrating compliance with the permit shall be maintained in accordance with section 7 of this document.

3.1.4 Any person having duties that are or may be affected by the matters set out in this EMS will be trained in and have convenient access to a copy of this document and the permit. These documents will be displayed at the Head Office, Stanford Bridge Farm, Station Road, Pluckley, Ashford, Kent, TN27 0RU.

3.1.5 All management staff, operational staff and subcontractors are trained out in the core principles of the EMS and in accordance with the guidance Landspreading: how to comply with your permit:

- *understand the requirements of other related environmental legislation such as waste duty of care and hazardous waste rules – see 2.2 Waste acceptance*
- *know that landspreading is a waste recovery activity and what this means – see the guidance under rule 2.1.3*
- *understand the causes and effects of pollution and know what controls are needed*
- *minimise the risk of pollution and harm to human and animal health, by using for example Protecting our water, soil and air*
- *follow site safety and risk assessments*
- *do routine inspections and maintenance of all mobile plant and equipment to prevent waste oils, hydraulic fluids and fuels spilling or leaking*
- *have and follow an emergency procedure for dealing with spills or leaks*
- *understand when conditions for landspreading are unsuitable or if the land is not available – landspreading wastes in unsuitable conditions may be classed as a waste disposal activity*

- *have access to the deployment form and the supporting documents for each deployment – including the Environment Agency's written agreement*
- *have access to the location map to know where any sensitive receptors are and to comply with buffer zones.*

### 3.2 Roles and responsibilities

3.2.1 FGS Organics Ltd will comply with the requirements of an approved competence scheme. Alexis Noonan is the principal Technically Competent Manager (TCM), but there are additional suitably qualified individuals within the business who can act as TCM. Each TCM has attained the WAMITAB Level 4 Medium Risk Operator Competence for Non-Hazardous Sludge and Land Spreading, copies of WAMITAB certificates are included in **Appendix 2** of this EMS.

3.2.2 The TCM individual takes responsibility for all operational activities carried out and can be within 2 hours of the site on the day of spreading and 4 hours at all other times.

3.2.3 There are several Nominated Competent Persons (NCP) who control day to day operations on site when spreading operations are carried out. An NCP can be a direct employee of the company, a contractor/ consultant or the TCM.

3.2.4 The sites at which spreading is carried out will be supervised by the NCP during the hours of operation. The NCP:

- can be at the field where spreading is taking place within 2 hours.
- has sufficient authority to give or withdraw approval for spreading to go ahead at a particular time using dynamic risk assessments (e.g. with reference to weather conditions).
- Will make sure the person delivering the waste to the site knows where and how to store the waste
- make sure that any person spreading the waste knows of any 'no spread' or buffer zones and any actions they need to take to protect sensitive receptors
- Is the first responder to any incidents including dust, noise or odour issues if the TCM is unavailable; and
- will raise any issues with the TCM as soon as they occur.

3.2.5 During operational hours, landspreading activity will be supervised by the TCM/NCP to ensure that:

- All storage and spreading are carried out in accordance with the deployment documents and EMS in the correct field and in the correct way;
- A dynamic risk assessment (e.g. with reference to weather conditions) is carried out before spreading starts;
- Spreading will not go ahead if there is an unacceptable risk of off-site impacts e.g. odour at sensitive receptors.

3.2.6 The persons operating the equipment (Operatives) are supervised to ensure that:

- The persons operating the equipment delivering and storing the waste have been briefed on where and how the waste must be stored prior to spreading;
- The persons operating the equipment to spread the waste are aware of any no spread buffer zones and any measures that need to be taken to ensure that sensitive sites are protected; and
- They record any incidents or non-conformances on the online compliance system and report them to the NCP/TCM.

3.2.7 All individuals who participate in the operational activities undertake continuous professional development (CPD) and understand their responsibilities for associated duty of care (DOC).

3.2.8 The Operator will maintain training records to demonstrate competence. These are stored on the online compliance system and are available on request.

3.2.9 A copy of the management structure (**FGSGROUP-HR-RAC-001**) is also available on request. The Operator will ensure that the structure is regularly reviewed and kept updated to reflect any changes in management and staffing within the organisation, and/or as regards external contractors and consultants. Roles and responsibilities will be defined, and a written record will be maintained for inspection.

## 3.3 Contingency planning

3.3.1 The Operator will ensure the following written contingency plans are in place to manage storage and land spreading operations in the event of:

- Machinery / Plant breakdown (Arrangement in place for repair or replacement within 24 Hours)
- Accidents that may result in pollution to the environment (Spillage and containment procedures as described in the Accident and Emergency Management Plan)
- Delivery problems (Arrangements in place to ensure adequate haulage resources are available at all times and that closed periods for Nitrate Vulnerable Zones are observed and material is stockpiled elsewhere)
- Adverse weather conditions (Arrangements are in place to ensure that at times of adverse weather, material that cannot be safely stockpiled on land will be stored at suitably licensed locations with hardstanding and a sealed drainage system. Where storage capacity is reached the contracted material will be directed to a suitably licensed Landfill facility).
- Staff shortages (Arrangements in place to ensure sufficient staff are suitably trained to cover landspreading requirements, in the event of Sickness or staff leave periods etc).

3.3.2 The Operator will ensure that there are:

- Repair/servicing contracts in place for all plant and machinery (Arrangements are in place to ensure repairs, maintenance and servicing are planned for, as far as practicably possible, and that replacement machinery can be made rapidly (within 24 Hours) of any breakdown occurring).

- Available staff to cover absence; (Arrangements in place to ensure sufficient staff are suitably trained to cover landspreading requirements, in the event of Sickness or staff leave periods etc).

3.3.3 In the event of an emergency the Operator will follow the procedures in the Emergency Management Procedure (**FGSGROUP-HSE-PRO-023**).

## 3.4 Avoidance, Recovery and Disposal of Wastes Produced by the Activities.

3.4.1 The operator shall take appropriate measures to ensure that:

(a) The waste hierarchy referred to in the Waste Framework Directive is applied to the generation of waste by the activities; and

(b) Any waste generated by the activities is treated in accordance with the waste hierarchy;

(c) Where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.

3.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

# 4. OPERATIONS

## 4.1 Permitted Activities

4.1.1 The Operator shall not undertake any waste management activity unless it is specifically listed below in Table 1 below reproduced from the Bespoke MPP (**Appendix 1**).

**Table 1 Licenced Activities**

| Description of activities | Limits of activities |
|---|---|
| R13: Storage of wastes pending the operation R10.<br><br>R10: Land treatment resulting in benefit to agriculture or ecological improvement | Secure storage of waste listed within the Bespoke MPP at the place where it is to be used for land treatment.<br><br>For each deployment, no more than 3000 tonnes in total of waste shall be stored at any one time.<br><br>Of this no more than 1250 tonnes shall be non-stackable waste.<br><br>No more than 3000 tonnes of waste shall be stored in a location at any one time. Of this no more than 1250 tonnes shall be non-stackable waste.<br><br>Waste shall be stored for no longer than 12 months.<br><br>The use of mobile plant to treat land with the types of waste Listed within the Bespoke MPP, where such treatment results in benefit to agriculture or Ecological improvement.<br><br>The quantity of waste applied per hectare shall not exceed that in the agreed deployment form and in any case no more than the following quantities of waste shall be spread on the land in any period of 12 months:<br>• In the case of soil from washing and cleaning sugar beet (02 04 01) 1,500 tonnes per hectare.<br>• In the case of dredging spoil from inland waters, (17 05 06)<br>• 5,000 tonnes per hectare; or<br>• In the case of any other waste, no more than 250 tonnes per hectare |

## 4.2 Permitted Wastes

4.2.1 Waste will only be received and spread if it conforms to a waste code and description of permitted wastes within the Bespoke MPP (Ref: EPR/BB3603XR) provided as Appendix 1 to this report. The wastes currently routinely accepted and those proposed under the permit variation, stored and spread complying with SR2010No4 activities are listed within Table 2 and land treatment operations in Table 3 below.

**Table 2 Waste types routinely accepted and stored**

| Waste Category EWC Code | Waste Description | Storage Location | Operation Code | Maximum Storage quantity | Maximum Storage Time |
|---|---|---|---|---|---|
| **Storage of non-hazardous waste for recovery** | | | | | |
| **19 06 06**<br>**19 06 05**<br>**16 10 02 (19 05 99)** | Whole digestate<br>Separated digestate liquor<br>leachate from composting that accepts waste types listed within a standard rules permit | Designated container/ lagoon details provided in deployment | R13 | 1,250 t | 12 months |
| **03 03 11**<br>**03 03 05**<br>**03 03 10**<br>**17 08 02**<br>**19 05 03**<br>**19 05 03**<br>**19 06 06**<br>**19 09 02**<br>**20 02 01** | Paper sludge from onsite effluent treatment<br>De-inked paper sludge<br>Paper crumb – fibre rejects and sludges<br>Recycled gypsum<br>Geen food included compost (IVC)<br>Green compost<br>Separated fibre digestate<br>Potable water treatment sludge<br>Seaweed only | Designated storage on deployment | R13 | 3,000 t | 12 months |

| | | | | | |
|---|---|---|---|---|---|
| **Bespoke waste streams** | | | | | |
| **19 02 03** | Premixed wastes composed of non-hazardous wastes from a lagoon so long as the wastes stored are listed within SR2010 No.4 | Designated container/ lagoon details provided in deployment | R13 | Specific to storage permit | 12 months |
| **19 12 12** | Poultry Grits from the mechanical treatment of chicken manure | Designated storage on deployment | R13 | 3,000t | 12 months |
| **10 01 26** | Wastes from cooling-water treatment | | | | |
| **COMBINED STORAGE OF ALL NON-HAZARDOUS WASTES NOT TO EXCEED 3,000 TONNES OF STACKABLE AND 1,250 OF NON-STACKABLE AS SPECIFIED IN TABLE 2.1 OF THE MPP** | | | | | |

**Table 3 Specified land treatment operations**

| Waste Category EWC Code | Waste Description | Operation | Operation Code | Maximum Quantity Spread and timing |
|---|---|---|---|---|
| **Landspreading of waste for recovery** | | | | |
| **19 06 06** | Whole digestate | Land spreading | R10 | Specified on relevant deployment |
| **19 06 05** | Separated digestate liquor | | | |
| **16 10 02 (19 05 99)** | leachate from composting that accepts waste types listed within a standard rules permit | | | |
| **03 03 11** | Paper sludge from onsite effluent treatment | | | |
| **03 03 05** | De-inked paper sludge | | | |
| **03 03 10** | Paper crumb – fibre rejects and sludges | | | |
| **17 08 02** | Recycled gypsum | | | |
| **19 05 03** | Geen food included compost (IVC) | | | |
| **19 05 03** | Green compost | | | |
| **19 06 06** | Separated fibre digestate | | | |
| **19 09 02** | Potable water treatment sludge | | | |
| **20 02 01** | Seaweed only | | | |

| Bespoke waste codes | | | | |
|---|---|---|---|---|
| **19 12 12** | Poultry Grits from the mechanical treatment of chicken manure | **Land spreading** | **R10** | **Specified on relevant deployment** |
| **10 01 26** | Wastes from cooling-water treatment | | | |
| **19 02 03** | Premixed wastes composed of non-hazardous wastes from a lagoon so long as the wastes stored are listed within SR2010 No.4 | | | |
| **COMBINED DAILY THROUGHPUT OF ALL NON-HAZARDOUS WASTES NOT TO EXCEED THE AGREED DEPLOYMENT FORM AND TABLE 2.1 OF THE MPP** | | | | |

## 4.3 Control measures specific to 19 02 03 Premixed wastes from a lagoon

4.3.1 Only wastes deemed acceptable to be spread to land under SR2010No4 Mobile plant permit will be mixed within the storage facility, as such as hazard risk assessment and soil screening values assessment has been completed for each potential waste stream previously. waste streams have already been assessed as to their suitability for spreading. When pre-mixed waste EWC 19 02 03 is spread from a permitted storage facility the following protocol will be followed:

a) Each individual waste will be sampled and assessed as to its agricultural benefit before being received to the lagoon. These details will be included within the deployment application.

b) The receipt of wastes will be logged and recorded such that the proportion of each waste added to the lagoon can be determined.

c) A representative sample of the pre-mixed waste will then be taken and analysed, and its agricultural benefit assessed to demonstrate the final mixture analysis, and correct application rate, to be applied to land under the deployment.

4.3.2 Should a new waste stream be added to the lagoon following deployment issue, a new deployment will be prepared to reflect the new resulting mixture of waste.

4.3.3 Mixing must not cause the wastes to react chemically or biologically and must not pose a risk to human health or the environment.

## 4.4 Planning use

4.4.1 A FACTS Qualified individual will provide recommendations for all applications and assist with preparing a deployment application for the fields to which waste will be spread. They will decide the correct amount to be applied to each field based on, information provided by the land manager, soil analysis crop need and the analysis of the material to be spread.

4.4.2 They will ensure:

- Fields are sampled and receiving soils tested (results <4 years old) prior to application for P, K, Mg and pH in accordance with the Nutrient Management Guide;
- Soil nitrogen supply (SNS) is assessed using the SNS assessment method;
- The spreading rate of waste is planned for each field such that crop needs are not exceeded and that crop nutrient offtakes are balanced; and
- That pollution risk from spreading (spread risk assessment) is accessed and communicated.

## 4.5 Completion of Deployment Forms and Benefit Statements

4.5.1 At least 25 working days in advance of starting any land spreading activity FGS Organics Ltd will notify the EA using a deployment form (LPD1) and associated documents.

4.5.2 For each deployment the notified proposals will be limited to no more than 10 waste streams: and no more than 50 hectares or 100 hectares for a single continuously managed area of land.

4.5.3 The EA has produced Generic Risk Assessments for MPP SR2010No4. The Operator shall produce Site Specific Risk Assessments based on the EA template; an example can be made available on request.

4.5.4 Deployments may fall into different levels of risk banding. The risk banding is based on two key aspects; the site location and the type of waste to be spread. The MPP splits the permitted wastes types into two separate tables 2.1 A and 2.1B known as List A and List B wastes.

The bands are classified as shown in the Table 4 below.

**Table 4 Risk banding for Bespoke SR2010No4 MPP**

| | **Lower risk location**<br>**Spreading is outside 500m of a European site, Ramsar and /or SSS1: and /or SPZ2** | **Higher risk location**<br>**Spreading is within 500m of a European site, Ramsar and /or SSSI: and /or SPZ2** |
|---|---|---|
| **Bespoke SR2010No4**<br>**All wastes**<br>**(higher risk)** | **Medium Risk**<br>1. Location Plan<br>2. Waste analysis<br>3. Receiving soil analysis<br>4. Benefit statement<br>5. Site specific risk assessment | **High Risk**<br>1. Location Plan<br>2. Waste analysis<br>3. Receiving soil analysis<br>4. Benefit statement<br>5. Site specific risk assessment |

4.5.5 The Operator or Agent will ensure that the deployment form includes all relevant information as required.

4.5.6 For Medium and High-Risk Deployment Applications, the Operator will produce a site-specific risk assessment in accordance with the EA Guidance. The procedure for carrying out a site-specific risk assessment is included in the Completing a Deployment Application instructions which are available to view on request.

4.5.7 The operator will ensure that a dynamic risk assessment is used throughout all spreading activities.

4.5.8 Each deployment application shall include an assessment, (Agricultural benefit statement) that shows that benefit will be conferred by spreading the notified waste streams. Instructions for Completing a Deployment Application are documented and in accordance with deployment application guidance. These instructions are available to view on request. The Operator will ensure that all deployment forms and associated Benefit Statements are submitted to the EA for agreement prior to commencing activities.

4.5.9 The waste operations agreed under deployment are valid for a period of 12 months from the date the EA gives their written agreement.

4.5.10 The Operator shall not start any waste operations, including storage of waste, at the site until the EA has provided written agreement to the deployment. Once a deployment is agreed the Operator shall comply with the terms of that deployment. A deployment form

is considered to be part of the Mobile Plant Permit (MPP) and any non-compliance with the deployment form will be viewed as a breach of the permit.

4.5.11 In the event that a minor change to the deployment form is required the Operator or Agent shall contact the Local Environment Agency Officer to request permission for an amendment to be made e.g. an unscheduled cropping change. The Operator shall not act on any such amendment until such a time as the EA has agreed to that amendment in writing.

4.5.12 If a deployment is rejected the Operator shall not spread the waste to land.

4.5.13 Records demonstrating compliance with the MPP will be maintained in accordance with Section 7 of this document.

4.5.14 The Operator will ensure that the activities are not to be carried out within:

- 10 metres of any watercourse
- 50 metres of any spring or well, or borehole used to supply water for domestic or food production purposes;
- Groundwater Source Protection Zone 1.

4.2.10 For high readily available nitrogen wastes shall only be stored or spread within a groundwater safeguard Zone for nitrate (unless stored in a lagoon):

- in periods outside of the NVZ closed periods for spreading organic manure with high readily available nitrogen;
- at application rates of ≤ 50m3/ha, with a minimum 3-week gap between applications; and
- to a maximum application rate of 250 kg total N per any given hectare.

## 4.6 Storage of waste

4.6.1 The LPD1 application provides details of the type and quantity of waste stored and the location map shows the:

- Areas of land to be treated

- Place of storage where the waste will be securely stored.

4.6.2 Waste must not be stored with other materials, including non-waste and must not be stored at an intermediate site that is not the 'place of storage' where the waste will be used.

4.6.3 Only waste that is suitable for direct use will be stored securely at the place where it will be used for land treatment. The Operator will take all precautions to prevent the waste from escaping and ensure that members of the public are unable to gain access to the waste.

4.6.4 Solid waste will be stored and managed in accordance with the appropriate measures specified in the EA Landspreading guidance outlined in 1.1.4. These include;

- Inside a building where possible;
- External Stockpiles;
- Locate temporary stockpiles in areas of low permeability if possible;
- Grade temporary stockpiles to promote rainwater run – off rather than infiltration through the stockpile;
- Manage all run –off or leachate which may be produced by the waste
- Be aware of slumping;
- Consider location of sensitive receptors such as residential properties /workplaces in relation to stockpiles that might be affected by loss of amenity or dust and odour.

4.6.5 The Operator will follow Best Practice for storage activities as listed below:

- Not on land likely to become waterlogged, frozen or snow covered;
- Not on land likely to flood;
- Not on steeply sloping ground where there is risk of run off
- Not in any single position, on bare soil, for more than 12 successive months
- Not over land drains or land drained in the last 12 months; and

- Try to avoid stockpiling odorous waste within 250m of residential homes or workplaces where possible.

4.6.6 Further guidance on storage in field heaps can be found in Booklet 4 Storage of Organic Manure of the NVZ guidance and Defra's Code of Good Agricultural Practice.

4.6.7 Liquid /sludge wastes will be stored within a secure impermeable lagoon or container with secondary containment. No liquid waste will be stored within 0.3 m of the top of an open storage container or within 0.75 metres of the top of a lagoon.

4.6.8 Liquid waste will be stored within a secure impermeable lagoon or container with secondary containment. Where secondary containment is not provided the Operator will use appropriate measures to prevent and minimise leaks and spills.

4.6.9 High readily available nitrogen wastes shall be covered to prevent or where that is not practicable, to minimise, the loss of ammonia when stored within 200 metres of a European Site, Ramsar Site or a Site of Special Scientific Interest (SSSI).

4.6.10 The Operator will take appropriate measures for the storage of liquid wastes in fixed storage facilities. Appropriate measures are considered to be those detailed in the Water Resources (control of pollution, silage, slurry and agricultural fuel oil) Regulations 2010 (SSAFO).

4.6.11 The Operator will refer to the SSAFO Guidance for the appropriate measures expected from liquid storage facilities used for land spreading permit and exemptions.

4.6.12 Waste will only be stored at the site of spreading for a maximum of 12 months during the deployment period.

4.6.13 Typically wastes will only be mixed incidentally to ease handling and spreading of the waste under the same deployment. Mixing must not cause the wastes to react chemically or biologically and must not pose a risk to human health or the environment.

4.6.14 Should wastes be mixed within a permitted lagoon they will be spread under 19 02 03 Premixed wastes composed of non-hazardous wastes from a lagoon so long as the wastes stored are listed within SR2010 No.4, as described in section 4.3.

4.6.15 Wastes will not be mixed prior to storage for treatment purposes. Mixed wastes that are stored together must not react with each other or exhibit changes in composition, such as pH or metals availability. Mixed wastes will remain appropriately mixed for the duration of the spreading operation to ensure that application is even across the land.

4.6.16 In the case that there are multiple Operators holding deployments for the same site the Operator will ensure that their waste is stored in a separate container regardless of whether the waste is the same.

## 4.7 Planning the field application

4.7.1 The TCM/NCP will select the fields to be spread at a given time. They will:

- Prepare a list of fields to be spread from the issued deployment.
- Ensure that the information provided is correct.
- Inform the EA with at least 48 hours' notice but no more than 7 days before the activity is due to start. In the event that spreading operations stop for more than 7 days and notify the EA at least 48 hours but no more than 7 days in advance of the intention to recommence spreading.
- Ascertain an accurate prediction of weather for the spreading location using the https://www.metoffice.gov.uk/ service or similar service.
- Consider wind speed and direction and the potential for transport of aerosols during the spreading of waste, which are also odour vectors, can smother vegetation through drift, causing nutrient enrichment if the operation is not undertaken with care;
- Consider soil conditions to avoid potential soil damage from the spreading operation; and
- If appropriate, issue work instructions to the spreader operator to proceed with spreading. The NCP will liaise with the spreader operator and either of them will decide to stop spreading if conditions deteriorate.

## 4.8 Waste Acceptance

4.8.1 The Operator has a written Waste Acceptance Procedure which is available on request. Waste shall only be accepted if:

- It is of a type and EWC code listed in the Bespoke Permit;

- It conforms to the description in the documentation supplied by the producer and holder; and

- It conforms to the agreed deployment form.

4.8.2 The Operator will ensure that all wastes accepted at the site for storage and spreading are fully characterised and acceptable through visual inspection of incoming materials in accordance with the waste transfer note (WTN) and the agreed deployment form. Employees must be trained on the expectations of waste materials to competently accept and reject waste materials.

4.8.3 The Operator will ensure that all Duty of Care transfer notes are completed for every load moved. This must be digitally recorded on the relevant electronic system and must include the following information:

- Origin of the waste;
- Quantity;
- Characteristics;
- Delivery data and identity of the waste producer.

4.8.4 The Operator will refer to the deployment form to identify and understand the beneficial and harmful properties of the waste to identify any potential problems that may arise from storage, transport and spreading.

4.8.5 Visual inspection of incoming waste will be undertaken in the location specified on the deployment.

4.8.6 The Operator will refer to the EA Landspreading guidance outlined in 1.1.4 for further clarification and definitions of the waste descriptions included within SR2010No4.

4.8.7 Once confirmed the load will be discharged to the appropriate storage area /container. The waste shall be discharged and visually checked for a second time to ensure that there are no non-permitted wastes within the load.

4.8.8 All wastes received shall be kept separate from and shall not be covered by or mixed with other wastes unless described appropriately as incidentally mixed within the relevant deployment.

4.8.9 Records will be maintained in accordance with Section 7 of this Environmental Management System.

## 4.9 Waste Rejection

4.9.1 In the event that a vehicle load, upon inspection, is non-compliant with the deployment description the material must be quarantined and managed:

- Refusal of the container/load to be tipped; the waste must be segregated and moved to a designated quarantined area on-site to prevent contamination or further handling;
- Record the event on My-Compliance following the non-conformance procedure and inform the TCM;
- Enterprise Manager must contact the waste producer to advise, educate and arrange collection or disposal.

4.9.2 Any items of non-permitted waste which are detected after acceptance at the site shall be placed immediately in a quarantine storage area and segregated from the other wastes. The details shall be recorded.

4.9.3 The Environment Agency shall be informed immediately in respect of all hazardous waste rejected by the site.

4.9.4 Quarantined waste shall be removed from site within 7 days. Records shall be kept of all rejected wastes as waste transfer notes.

## 4.10 Waste Quantity Measurement Systems

4.10.1 Incoming waste shall be recorded in cubic metres or tonnes and measured based on the capacity of the containers used for transport or over a weighbridge.

## 4.11 Spreading the waste

4.11.1 The Operator will choose the most appropriate technique for the type of waste to be spread. The choice of method is important in managing the potential for pollution and odour from the activity.

4.11.2 The EA cites the following appropriate methods for the application of waste to land:

- Surface application by manure spreader or liquid tanker and mobile irrigation unit;
- Surface application using band spreading methods, for example dribble bar, trailing shoe or trailing hose;
- Injection using deep or shallow injection with open or closed slot.

4.11.3 The Operator will ensure that waste is managed and spread in accordance with a dynamic site-specific risk assessment. The risk assessment will take account of changing circumstances to ensure that the activity is managed proactively to minimise the potential for pollution caused by spreading issues, odour, noise and dust.

4.11.4 Additionally, the Operator will refer to the EA guidance outlined in 1.1. to understand the benefits and risks associated with various spreading techniques.

4.11.5 The Operator will take all appropriate measures to ensure that the spreading activity does not cause harm to human health or the environment. Appropriate measures are included below:

- Spread the waste at a time when the soil or crop will need it and will provide optimal benefit to the soil or crop.
- Spread the waste when the weather and ground conditions are suitable to allow the waste to be incorporated into the soil and/or used by the crop.
- Spread the waste at the rates approved in the deployment farm to ensure that the minimum amount of waste is used to confer the intended benefit.
- Wastes must be spread in as accurate a manner as possible to achieve the deployment application rate.
- Machinery used to spread wastes must be appropriate for the physical state of the waste and the receiving land (e.g. to allow for slope, soil type and land use).
- Liquid and odorous wastes should not be spread using high trajectory splash plate equipment.

4.11.6 The following plant will be used for spreading the material:

- Self-Propelled, spinning disc low trajectory rear discharge spreaders
- Trailed spinning disc low trajectory rear discharge spreaders
- Self-Propelled tanker with various application methods
- Trailed tanker with various application methods
- Trailing Shoe applicators
- Shallow Injectors
- Deep Leg Injectors
- 360 Excavator
- Wheeled Loading Shovels
- Wheeled Telehandler

4.11.7 The NCP or operative will assess the risk of runoff and soil erosion in all fields to be spread using these factors:

- the angle of slopes, particularly if the angle is greater than 12 degrees;
- amount of ground cover;
- distance to inland freshwaters, springs, wells or boreholes;
- soil type and condition; and
- presence and condition of land drains.

4.11.8 The operative will not spread waste:

- on waterlogged, flooded or snow-covered soil
- when the soil has been frozen for more than 12 hours in the past 24 hours
- within 50m of a spring, well or borehole
- within 10m of inland freshwaters or coastal waters
- where risk factors, determined by a generic, site specific or dynamic risk assessment mean there's a significant risk of pollution

4.11.9 Any land that falls under NVZ rules must be in adherence to these rules. In addition, all waste spreading must be carried out in accordance with FRfW to meet crop need. High readily available nitrogen materials must not be spread on or between the dates shown in this Table 5 below.

**Table 5 NVZ closed periods to spreading**

| Soil Type | On grassland | On tillage land |
|---|---|---|
| Sandy or shallow soils | 1 Sep to 31 Dec | 1 Aug to 31 Dec |
| All other soils | 15 Oct to 31 Jan | 1 Oct to 31 Jan |

4.11.10 The exception being if a crop which has crop need in the autumn is drilled on sandy or shallow tillage land on or before 15 September, you can apply manures with high readily available nitrogen between 1 August and 15 September inclusive. In addition, the NVZ rules specify:

4.11.11 **Do not spread** more than 30 $m^3$ /ha of high RAN liquid wastes from the end of the closed period until the end of February and allow at least 3 weeks between each individual application.

## 4.12 Recording the application

4.12.1 Following application, the quantity spread is recorded by the spreader operator within the online App Ag-Drive The information recorded includes:

- field or land parcel name/ number;
- crop to which it is applied;
- date of application;
- rate applied (t/ha or $m^3$/ha) and
- spread area of field in hectares (excluding buffer zones, woodland, protected habitats, or land that will not be spread for another reason).

4.12.2 Details of the application are provided to the farmer, which include:

- crop need (kg/ha);
- total nutrients; and

- estimated crop available nutrients supplied (kg/ha).

4.12.3 The balance of manufactured fertiliser required to meet crop need (kg/ha) is then calculated, and the actual decision on fertiliser use rests with the farm manager for the land in question.

4.12.4 The records kept comply with the requirements of Nitrate Vulnerable Zones Regulations, FRfW, Cross Compliance and those of the Bespoke MPP.

# 5. POLLUTION CONTROL AND REPORTING

## 5.1 Control of Mud and Debris

5.1.1 Mud and debris being deposited on the public highway will be controlled using the following methods:

- Road sweeping if necessary;
- Containment, storage and treatment of waste is in designated areas within stockpiles and / or containers;

5.1.2 In the event of any mud/debris found to be on the public highway resulting from lorry movements, from the site, the affected public areas outside the site shall be cleaned. Measures will be taken to clear any such sources from the highway as soon as is practicable.

5.1.3 Additionally, all loaded vehicles will be sheeted to avoid the escape of any waste.

## 5.2 Potentially Polluting Leaks and Spillages of Waste

5.2.1 The acceptance of non-hazardous wastes only and adherence to a monitoring and inspection regime will ensure that the risk of potentially polluting leaks and spillages of waste are minimised.

5.2.2 The Spillage Procedures for Fuel/Diesel and Landspreading Materials are included in the Emergency Management Procedure (**FGSGROUP-HSE-PRO-023)**. Any minor spillages of liquid waste or oil shall be cleaned up immediately, using sand or proprietary absorbent to

clean up liquids. In the unlikely event of a major spillage, immediate action shall be taken to prevent contamination entering surface drains, watercourses and un-surfaced ground. Temporary bunds using soil or similar will be placed around the area affected until the spill is cleared up. The AMP will be followed.

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

(a) any malfunction, breakdown or failure of equipment or techniques, accident or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution;

(b) the breach of a limit specified in these standard rules; or

(c) any significant adverse environmental effects.

5.2.4 The details of the event will be recorded as an incident on the Compliance system in accordance with the Emergency Management Procedure (**FGSGROUP-HSE-PRO-023**) **.**

5.2.5 Written confirmation of actual or potential pollution incidents will be reported to the EA within 24 hrs in accordance with the AMP on the Accident/Incident reporting form. A Route Cause Analysis will be carried out post incident.

## 5.3 Fire

5.3.1 No wastes shall be burnt on the site where storage and landspreading occur. There will be no smoking on site unless in a designated area.

5.3.2 Special care will be taken with respect to potentially explosive/volatile material during handling, e.g. aerosol cans, oxidising agents, corrosive substances. These wastes are not permitted under the permit and, they should not be present as long as the waste acceptance procedures are strictly adhered to.

5.3.3 All site operatives shall be required to recognise signs of smouldering waste at the point of reception. Such wastes shall be quarantined. The NCP and TCM will be immediately informed.

5.3.4 The Operator has written Fire Procedures for fires occurring in the field during reception, transfer and spreading of materials; these are included in the Accident and Emergency

Management Plan. Operators are required to sound the alarm, call the fire service, evacuate the area and report the fire to their line manager.

5.3.5 Appropriate fire extinguishers shall be maintained in company vehicles. If a vehicle is fitted with a fire extinguisher it should only be used to aid escape. Spreading operatives are not expected to fight the fire – they should raise the alarm and then retreat.

5.3.6 Operatives should follow the company fire procedure, inform their line manager and the incident should be reported on the Compliance software. The relevant line manager will notify the Fire Service and/or the Environment Agency. Records will be kept of all fires, accidents and incidents on compliance software. Information should include the nature and extent of the incident, and the actions and remediation measures taken.

## 5.4 Site Inspections and daily checks

5.4.1 The site inspections shall be in the form of a checklist and undertaken by the TCM or NCP in his/her absence. The Landspreading Inspection Form and Stockpile Inspection Form are set up as audits on compliance software and can be completed electronically on a mobile device. Photos and evidence can also be attached. Each inspection report will be kept on file and can be made available to the Environment Agency on request.

# 6. EMISSIONS AND MONITORING

## 6.1 Introduction - Emissions to air, land and water

6.1.1 The MPP does not allow point source emissions to air or watercourses. The only emissions to land permitted under the MPP are those waste types and amounts listed in the MPP and in the agreed deployment form.

6.1.2 Emissions from waste to land operations can lead to pollution of surface and groundwater, and the air. Waste storage and spreading operations can lead to the production of emissions of dust, aerosols, odour and noise. Additionally, vermin and scavenger can be attracted to organic wastes if not managed effectively.

6.1.3 The EA requires that the Operator takes appropriate measures to control potential emissions from the waste operation. The following sections therefore set out the measures that will be taken to prevent or minimise the risk to potentially sensitive receptors.

## 6.2 Monitoring Control and Reporting of Dust Emissions

6.2.1 The key sources for the generation of dust on site are as listed below:

- Dust raising from public, haul roads and operational surfaces through vehicle movements;
- Dust raising from the mechanical loading /unloading of wastes, mixing;
- Dust raising from the spreading operation;
- Dust raising from stockpiles.

6.2.2 The operator shall take all appropriate measures to reduce and prevent dust emissions generated by the site. Table 6 below sets out the measures that shall be undertaken to control and monitor the release of dust, fibres and particulates.

**Table 6 Measures to control and monitor emissions**

| **Appropriate Measures for Reducing Emissions of Dust** | |
|---|---|
| ▪ Undertake operations within suitable weather windows wherever possible<br>▪ All incoming loads to be tipped in such a way as to minimise dust generation.<br>▪ All loading /unloading activities to be undertaken carefully to prevent waste materials being dropped from a height.<br>▪ Manage loading operations from stockpiles to spreaders as above.<br>▪ Keep stockpiles with the potential to give dust as small as possible<br>▪ Locate potentially dusty material in sheltered areas if possible and consider covering with a suitable material or cover<br>▪ No storage of waste outside designated containers or stockpile areas.<br>▪ Spread on stubbles or established grass, not on land undergoing cultivation with a broken surface<br>▪ Limiting site vehicle speeds on machinery haul roads<br>▪ Avoid using headlands close to sensitive receptors when running on stubble or bare land<br>▪ Limit vehicle speeds during spreading to reduce dust raising<br>▪ Avoid spreading dust wastes in close proximity of sensitive receptors such as residential properties where dust may cause nuisance and other sensitive receptors where dust may deposit nutrients on sensitive habitats<br>▪ Maintain records of all actions | |
| **Monitoring of aerial emissions** | |
| ▪ Daily visual monitoring of aerial emissions at site boundaries shall be carried out by staff supervising all waste handling operations. | ▪ Operatives and NCP to monitor operations throughout day at the site boundary that is downwind of operations.<br>▪ Observations and weather conditions including wind direction will be recorded on the odour and dust monitoring sheet.<br>▪ Complaints are to be recorded in accordance with the customer feedback procedure which is available on request. |

6.2.3 The Operatives will take account of the weather conditions and ensure that all waste operations are undertaken in accordance with this information. Daily records of weather conditions, including wind direction and speed will be recorded on the odour and dust monitoring form.

6.2.4 The NCP will carry out regular inspections of dust and odour which will be recorded on an odour and dust monitoring form. All operational staff will be made aware of the importance of preventing dust emissions from leaving the boundary of the site.

6.2.5 Records of odour and dust monitoring will be made on the odour and dust monitoring form and will include the time, date, wind direction and speed, weather conditions, site activities, signature, comments and result at time of inspection. These forms can be completed by the spreading operatives, NCPs and TCMs. The records will be kept on file and can be made available to the Environment Agency on request.

6.2.6 In the event of a complaint the Operator will immediately investigate the source of the dust and whether it is originating from the site. Action will be taken to prevent any further emissions leaving the site. Complaints are to be recorded an accordance with the Customer Feedback Procedure which is available on request.

## 6.3 Monitoring and Control of Odours and Aerosols

6.3.1 The Operator will manage the waste operation in accordance with appropriate measures for the control of odour and the procedures cited within the Odour Management Plan. Please refer to the **Odour Management Plan (FGSGROUP-ENV-PRO-008)** for the procedures relating to monitoring and control of odour.

## 6.4 Monitoring and Control of Noise

6.4.1 Noise and vibration will be maintained at levels associated with normal agricultural activities. Where the Site-Specific Risk Assessment identifies sensitive receptors in close proximity to the operation the Operator will take all measures to minimise noise impacts to those receptors as detailed in the risk assessment.

6.4.2 The operator will ensure that all plant is maintained in accordance with the manufacturer's guidelines. Maintenance records will be maintained.

## 6.5 Monitoring and Control of Litter

6.5.1 The risk of litter becoming a nuisance is considered to be very low because wastes will have been segregated and should not contain litter. However, the potential for litter nuisance will be further minimised with the implementation of the following provisions:

- Sheeting of all incoming loads;
- All incoming loads to remain sheeted until ready to be tipped;
- The presence of litter will be continuously monitored during landspreading inspections and recorded on the landspreading inspection form; any necessary actions will be returned to the environmental compliance team, for example litter picking.
- Litter picking if necessary

6.5.2 On the detection of litter, the operator shall take action to review the waste management processes at the site and modify or cease handling the waste if necessary, in order to minimise the production of litter.

6.5.3 The incident, actions and results shall be recorded on the My-Compliance system.

## 6.6 Monitoring and Control of Pests (including Scavengers, Vermin and Flies)

6.6.1 The Operator will take appropriate measures to prevent and reduce nuisance from scavengers, vermin and files. These are listed below in Table 7.

6.6.2 On detection or notification of pest infestations, immediate action shall be taken to secure the attendance of a professional pest control contractor, to eliminate the pest infestation. The incident and remedial action shall be recorded on the My-Compliance system.

**Table 7 Measures to reduce nuisance from scavengers, vermin and flies**

| **Appropriate Measures for Reducing Nuisance from Scavengers, Vermin and Flies** |
|---|
| ▪ Reduce the potential for scavenging, attracting vermin and fly breeding in stockpiles by identifying waste likely to attract flies. Wastes containing food and animal by-products are higher risk and will be managed in accordance with short holding times to ensure that stockpiles are delivered and cleared daily where possible |
| ▪ Locate loading/ unloading areas, stockpiles /nurse tanks as far from human receptors as is possible |
| ▪ Incorporate wastes with the potential to attract scavengers, vermin and flies within 24 hours of spreading on land for cultivation |
| ▪ Inject wastes with a potential to attract scavengers, vermin and flies into grassland and if applying this type of waste to established crops |
| ▪ Keep machinery clean |
| ▪ Conclude operations as quickly as possible |

| Appropriate Measures for Reducing Nuisance from Scavengers, Vermin and Flies | |
|---|---|
| **Monitoring of aerial emissions** | |
| ▪ Daily visual monitoring of stockpiles by staff supervising waste handling operations. | ▪ NCP to monitor waste types for infestations<br>▪ Observations and weather conditions including wind direction will be recorded on the odour and dust monitoring form<br>▪ Complaints are to be recorded in accordance with the Customer Feedback Procedure – this is available on request. |

# 7. RECORDS

## 7.1 Security and Availability of Records

7.1.1 Records will be kept demonstrating that FGS Organics Ltd has complied with the:

- Permit and deployment form
- Witten management system
- Any other plans or requirements

7.1.2 All Duty of Care Waste Transfer Notes will be kept for a minimum of 2 years at Head Office, in digital format.

7.1.3 Records of received and spread waste streams shall be kept for all land under deployment for a minimum of 6 years. These will made available for inspection by an authorised person. FGS Agri has designed its own digital record keeping system for these purposes.

7.1.4 Records of incidents which may have caused or were alleged to have caused, harm or health effects will be kept until the permit is surrendered.

## 7.2 Records kept

7.2.1 Records of the deployment form, location map, benefit statement, waste and receiving soil analyses and site-specific risk assessment (if applicable) will be kept.

7.2.2 Records of all waste movements shall be kept in accordance with the relevant condition in the permit. Additionally, a waste return will be submitted quarterly to the Environment Agency detailing the waste types accepted and removed from the site. The waste return will be submitted to the Agency within 1 month following the end of the quarter.

7.2.3 Daily records of spreading activities will be kept to demonstrate compliance noting:

- Any plant and machinery breakdowns which may occur;
- Emergencies;
- Problems with waste received and action taken;
- Site inspections and consequent actions carried out by the operator;
- Severe weather conditions;
- Any environmental problems and remedial actions taken;
- Any complaints related to operational activities;
- Monitoring records including odour and dust monitoring forms
- Spreading tickets

7.2.4 Records of any incidents that occurred during spreading will be kept All records shall be completed within 24 hours of the event.

7.2.5 Records of quarterly waste returns, TCM and NCP attendance are also kept.

# 8. MANAGEMENT SYSTEM DOCUMENTS

8.1.1 The operator has established and implemented procedures and forms to support this EMS they are listed in Table 8 below.

**Table 8 Supporting documents to the EMS**

| Document Reference | Document Title |
|---|---|
| FGSGROUP-HSE-PRO-023 | Emergency Management Procedure |
| FGSGROUP-ENV-PRO-008 | Odour Management Plan |
| FGSGROUP-ENV-POL-001 | Environment Policy |
| FGSGROUP-HR-RAC-001 | FGS Group Organisation Chart |
| FGSGROUP-ENV-RAC-001 | Benefit Statement Template |
| FGSGROUP-ENV-RAC-003 | Deployment Risk Assessment |
| FGSGROUP-ENV-RAC-004 | Odour and Dust Monitoring Form |
| FGSGROUP-ENV-RAC-006 | Stockpile Inspection Form |
| FGSGROUP-ENV-RAC-007 | Landspreading Inspection Form |
| **Work Instructions** | |
| FGSGROUP-ENV-WI-001 | Completing a Deployment Application |
| **Procedures** | |
| FGSGROUP-ENV-PRO-004 | Waste Acceptance Procedure |
| FGSGROUP-QUL-PRO-006 | Customer Feedback Procedure |

# APPENDICES

## Appendix 1 FGS Organics Mobile Plant Permit and Rules sets

## Appendix 2: WAMITAB Certificates of Technical Competence

(To be included on permit issue)