Doc ref:- Milb002 Summary
No Appendix attached.

Milber Salvage & Spares Ltd
Management System

This Management System has been prepared by Kerry Robbins on behalf of Milber Salvage & Spares Ltd

Environmental Permit No. EAWML 21529

Version 1.0 was drawn up in: January 2017
Version 2.0 January 2018 – No Changes
Version 3.0 January 2019 – Changes to staff only

Latest: Version 4.0 November 2019 – Changes made.

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Introduction - History of Site and Activities

Milber Salvage & Spares Ltd was purchased by Mr Steve Hunt (our Father) in 1993. It was already established as a vehicle scrap and salvage business. It is currently run by the family and has been since it turned to a limited company in 2003. Within the last 20 years the site has undergone many improvements and amendments within the business boundries.

Milber Salvage & Spares Ltd currently carries out two main activities:

(i) The reception, sorting, storage and dispatch of metals
(ii) The reception, sorting, storage, depollution and dispatch of end-of-life vehicles

1. Management of Activities

1.1 Environmental management system

The site operates under an in-house Management System which sets out the methods for controlling risks to the environment and complying with the requirements of the Environmental Permit. The site management is committed to continuous improvement and working towards operational best practice. The Management System is audited every 12 months to check that the procedures are being implemented correctly and reviewed and revised as necessary. The entire system will be reviewed at least every 4 years and sooner if there are any significant changes.

1.2 Staff and Staff Competence

The staff that operate the site include:

Danny Hunt – **Site/Workshop Manager** to oversee all operations within the workplace
Waste reception operative to receive, inspect and validate wastes
Yard maintenance operative to carry out general site maintenance
Receptionist to process waste reception documentation

Gary Hunt – **Depollution Manager** to oversee all depollution operations
Machine Operative to sort, process and load/unload wastes
Depollution Operative for depolluting end-of-life vehicles
Driver for collection and dispatch of wastes
Yard maintenance operative to carry out general site maintenance

Kerry Robbins – **Technically Competent Manager** to oversee operations and ensure compliance with the Environment Permit
Receptionist to process waste reception documentation
Waste reception operative to receive, inspect and validate wastes
Delivery driver to deliver re-usable parts from end-of-life vehicles to garages

Steven Frampton – **Vehicle Technician** to repair/replace broken parts on re-sale vehicles and to carry out MOT work on company vehicles.
Receptionist to process waste reception documentation.
Workshop supervisor to oversee all workshop operations & to assist where needed.

Undepolluted vehicles
Vehicles received on to site are directed to the Reception area to be assessed for further treatment by one of the following methods:

- reuse or preparation for reuse
- depollution prior to breaking for spares
- depollution prior to crushing and dispatch for recycling

A limited number of vehicles may be assessed as suitable for reuse and are stored outside the permitted area. All **end-of-life** vehicles are moved to the depollution area and depolluted as soon as possible, usually within 24 hours of being received. Following depollution, the vehicles are diverted to the appropriate storage area.

Vehicles for scrapping are stored awaiting baling and dispatch.
Vehicles for breaking are stored for approximately 6 months following depollution.

Parts for resale
The depolluted vehicles are stored intact and parts are removed for sale as and when required.

Engines and gearboxes
Depolluted engines and gearboxes are stored in a secure, steel container prior to dispatch.

Batteries (automotive)
Batteries are stored in a battery box under cover in a separate concrete bunded area.

Fuels from depollution
Fuels drained from depollution activities are stored in 25 litre drums within a secure cabinet in the covered depollution area.

Oils from depollution
Oils are stored under cover in bunded oil tank within a separate concrete bunded area.

Antifreeze and screenwash
Waste coolants and screenwash are stored in 205 litre drums under cover in the depollution area.

Catalysts
Catalytic converters are removed from the exhaust systems and stored intact in a secure, locked container, prior to sending the units to a specialist recycler.

Tyres
Tyres are stored on racks or stacked. The quantity of tyres stored on site, at any one time is kept at around 500 to minimise the risk of fire or spread of fire.
Tyres assessed for reuse, where possible, and the remaining are sent for disposal.

Ferrous metals
Ferrous metals are segregated and stored outside next to the baling area.

Depolluted car shells
Depolluted car shells are crushed and stacked adjacent to the ferrous metals prior to dispatch to an appropriate facility.

Non-ferrous metals
Non-ferrous metals are sorted and segregated into different types and stored under cover in containers.

Air-conditioning gases
Airconditioning gases are stored in designated tanks within the degassing equipment.

LPG gas tanks
Vehicles with LPG tanks have not been accepted in the past. Guidance on handling and storage would be sought from HSE on the current guidance and / or IDIS (The International Dismantling Information Service)

Fuel storage for equipment and plant
Fuel for equipment and plant is stored in transportable bunded containers.

Gas bottles
Gas bottles are stored in a purpose built gas cage to reduce health, safety and environmental risks.

Storage times
No wastes are stored on site for more than 1 year prior to disposal or 3 years prior to recovery. This is managed by maintaining through output and processing wastes regularly.

Maximum storage capacities
We are limited within our permit to receiving/dispatching 1300 tonnes per annum. The site maintains accurate records of wastes received and dispatched using the transfer note system/ Environment Agency returns.

Storage of Hazardous wastes from the depollution of vehicles (**not** including undepolluted vehicles) is restricted to less than 50 tonnes at any one time. All Hazardous wastes are stored within secondary containment to prevent accidental release.

Storage heights are maintained at safe levels so that any stockpiles remain stable to reduce the risk to health, safety and the environment. Vehicles waiting to go in the depollution bay are stacked maximum 2 high. Vehicles that have been baled are stacked, maximum 5 high in storage area. Vehicles that are stacked for parts to be removed as and when are stacked maximum of 2 high. There is an ongoing improvement plan to store ELVs on purpose built racking, wherever possible.

2.2.4 Fire Prevention Plan

A stand alone Fire Prevention Plan (FPP) (See Appendix 6) sets out the fire prevention measures and procedures in place

- to prevent a fire occurring
- for dealing with a fire if one breaks out

Exercises are carried out every 12 months to test how well the plan works and make sure that staff understand what to do.

2.2.5 Safe Operating Procedures

A set of Safe Operating Procedures (SOPs) has been drawn up to cover all activities on site to minimise the risk to the environment and health & safety. See Appendix 5 for the Index and currently available instructions for all activities. Wherever possible, the SOPs reflect Environment Agency and HSE Best Practice requirements and any manufacturer/ supplier/ installer instructions and maintenance requirements.

2.2.5 Site security

The site is protected by block wall and site fencing as shown on the Site Plan. (See Appendix 1) A secure gate at the entrance to the site is locked outside operational hours and the site has a good quality CCTV system installed.

2.2.6 Resources – Site infrastructure and equipment

The site utilises the following resources during its operations:

Site infrastructure
Site sign
Perimeter wall/ fence
Concrete pad
Bunds
Depollution area
Oil and fuel tanks
Drains & drainage system
Interceptors
Depollution shed
Storage racks
Security system

Storage
Fuel tanks
Fuel storage cabinet
Battery boxes

Plant
Mechanical grab for loading/unloading/ moving/sorting wastes and vehicles
Back up machine and grab
Forklift for moving loads
Baler Machine

Vehicles
Lorry for collection and shipping wastes out
Delivery van

Equipment
Weigh scales
Depollution rig
Airbag deployer
Airconditioning degassing equipment

Emergency equipment
Fire extinguishers
Spill kits

2.2.7 Maintenance requirements

All key items of plant, equipment and infrastructure are subject to a programme of servicing and maintenance. The servicing and maintenance intervals are determined by the manufacturer/ supplier/ installer or a competent person and any legal requirements. Manufacturers' manuals and other user information, where available, are held in the Plant & Equipment files in the site office.

All servicing and maintenance requirements are recorded on the **Maintenance Checklist**. (Appendix 7) As some items e.g. plant and equipment are replaced from time to time, the checklist is updated as and when required.

2.2.8 Maintenance Schedule

A wall chart is used to record the dates when scheduled servicing and maintenance is due and when it has been carried out, as specified in the Site Equipment and Maintenance Plan (Appendix 7). We also have an outside contractor who comes to the yard on an annual basis to inspect all of our lifting equipment and writes on a report on his findings. Other machinery, plant and equipment and the site infrastructure are monitored using regular checks and repaired or replaced as, and when, necessary. See Appendix 7 for examples of check sheets.

2.2.9 Maintenance Records

Servicing and scheduled maintenance records for machinery and equipment are held in the Plant & Equipment files in the Site Office. Records of other maintenance carried out are recorded in the Site Diary.

2.2.10 Contingency plans for foreseeable breakdowns and failures.

The site has contingency plans in the event of breakdown or failure of the following key items of equipment and infrastructure on site where it could lead to an inability to process wastes resulting in stockpiling or potential pollution of the environment:

Machine/ Infrastructure	Contingency in the event of breakdown/ failure
The mobile crusher	The maintanance is done in house. Where there could be delays waiting for parts or repair etc, there is a capacity (approx 2 weeks) to be able to store uncrushed wastes without affecting existing operations. In the event of a long delay, the wastes could be shipped out without being crushed, if necessary.
Depollution equipment	Staff on site can repair most items or replace, as necessary.
Concrete pad	The majority of the site is surfaced with concrete to a minimum depth of 30 cm and C45 specification. In the event of any structural failure which could lead to pollution of the environment, there is sufficient space on site to rearrange activities so that repairs could be undertaken.
Diesel tank	The site has one diesel tank which is double skinned. There are spill kits available in the event of an emergency.
Drainage system	The drainage system including the interceptor and hydro-valve are monitored and cleaned on a regular basis. In the event of a blockage or failure, maintenance will be carried out on site to fix the problem. The site also has pumps and containment which could be used to deal with any problems on a temporary basis.

Most small items of equipment would either be repaired in-house or would be replaced in the event of a breakdown or failure.

2.3 Accident Prevention and Management Plan (See Appendix 8)

2.3.1 Emergency Plan – Site Map

The Emergency Plan - Site map shows the areas of risk which could lead to pollution of the environment arising from emergency situations, such as potential ignition sources, location of fuel tanks, drains and interceptors etc. It highlights the location of emergency equipment such as fire hose, spill kits and emergency exits. This map is retained as part of the Management System and is held in the site office. A separate Fire Prevention Plan is detailed in Appendix 6

2.3.2 Emergency Contacts (See Appendix 8)

A list of key contacts and contact numbers is maintained and kept up-to-date. It is displayed in the site office and an emergency contact number is also on the sign on the entrance gate incase emergency services need to contact one of us.

2.3.3 Accident management procedures (See Appendix 8)

A set of procedures is available for emergency situations which could lead to pollution of the environment or harm to human health including for:

- Fire
- Spill
- Flood
- Vandalism/ Break-in
- Explosives in the waste
- Radioactive items in the waste

Spill kits are available for small, containable spills and any used absorbents / contaminated rags are suitably packaged and sent for disposal to a permitted facility.

2.3.4 Accident Reporting

All accidents will be reported using the Incidents and non-conformance system.

2.4 Incidents and non-conformances

2.4.1 Incidents and non-conformance system.

The Incidents and non-conformance system covers the recording, investigation and rectification of accidents, incidents such as malfunctions, breakdown or failure of equipment, techniques, breaches in site security or other non-compliances. In the event of an incident or non-conformance, the following details will be recorded in the Site Diary:

1. Date and time (24hour clock) of the incident
2. Details of what happened
3. Details of any witnesses
4. Cause or likely cause of the incident
5. Details of any significant pollution or environmental damage
6. Details of the action you have taken

7. Details of who you have reported it to and the date/ time this was done
8. Details of what you have done to prevent it happening again

Some typical incidents are listed below:

Incident / non-conformance	Details to be recorded	Action
Breakdown or failure of equipment or infrastructure which has or is likely to cause a breach of the permit and/or pollution of the environment	As listed in 1. – 8. above in your Site Diary	• Prevent pollution or further pollution as far as possible • Notify the Environment Agency on 0800 807060 as soon as possible. • Follow contingency plan (as in 2.2.10) and/ or any other instructions from the Environment Agency. •
Waste is not acceptable under the Environmental Permit or other waste rejection	As listed in 1. – 8. above in your Site Diary	• Reject (or quarantine the waste if already accepted in error) • Follow the procedures for refusal of ELVs and other metals.
Vehicle is contaminated with other wastes	As listed in 1. – 8. above in your Site Diary	• Reject (or quarantine the waste if already accepted in error) • Follow the procedure 02 for ELVs
Fire on site	As listed in 1. – 8. above in your Site Diary	• Follow Emergency procedures • Prevent pollution or further pollution as far as possible including preventing firewaters entering watercourse/ the drainage system • Notify the Environment Agency on 0800 807060 as soon as possible
Spill of polluting liquid which has contaminated the ground or entered the drain or watercourse	As listed in 1. – 8. above in your Site Diary	• Prevent pollution or further pollution as far as possible • Notify the Environment Agency on 0800 807060 as soon as possible.
Complaint about noise, vibration, dust or other nuisance	As listed in 1. – 8. above in your Site Diary	• Investigate source of nuisance and eliminate or reduce where necessary
Metal known or believed to be stolen	As listed in 1. – 8. above in your Site Diary	• Notify the Police on 101 and follow their instructions • Retain CCTV footage and any relevant details
Vehicle known or believed to be stolen	As listed in 1. – 8. above in your Site Diary	• Notify the Police on 101 and follow their instructions • Retain CCTV footage and any relevant details

Details of any accidents to people will be recorded in the Site accident Book.

2.4.2 Site Notice Board

A site notice board is displayed at the entrance to the site giving identifying site information and contacts. It is easily readable from outside the site in daylight hours.

Information on the sign includes:

Permit Holder's name – Milber Salvage & Sprares Ltd
Emergency Contact name and number – Danny Hunt 07402755508
Operator's telephone no. – 01626 365100/363549
The Permit no. – EAWML 21529
EA National nos. 03708 506506 and 0800 807060 (Incident Hotline)

2.5 Closure

2.5.1 Details of previous use and systems for protection of the environment

Records relating to the site in terms of upgrades of the facility and significant maintenance and engineering work carried out are held in the site office. These detail any additional measure put in to prevent, where possible, or minimise pollution caused by activities on the site.

2.6 Complaints

2.6.1 Complaints system

Any complaints received by the site in relation to its activities will be logged in the Site Diary and investigated thoroughly. A complaint will be regarded as an incident/ non-conformance and the Incidents and non-conformance system will be followed. (See 2.4.1)

Where the complainant has a valid complaint, steps will be taken to rectify this as soon as possible and the action noted in the Site Diary.

Where the complaint is investigated and found not to be a valid complaint, details will be noted in the Site Diary.

In all cases, details of the investigations and actions taken must be logged in the Site Diary. If there is a significant amount of other documentation e.g. correspondence with the complainant, then this will be filed separately and a note will be put in the Site Diary to say where it is filed.

In every case, whether a genuine complaint or not, the complainant will be informed that the complaint has been investigated, the findings of the investigation and what action has been taken, if any.

2.7 Staff training and Competence (See Appendix 9)

2.7.1 Defined roles and responsibilities for each Job Role

The 7 main Job Roles and their responsibilities are listed below:

Job Role	Responsibilities
Technically Competent Manager/ Site Manager **Kerry Robbins & Danny Hunt**	Oversee operations and ensure compliance with the Environmental Permit Ensure Site Safety Manage Operations Organise transport
Weighbridge operator/ Receptionist **Kerry Robbins & Danny Hunt**	Process waste reception documentation Checking ID Making payments Issuing CODs
Site Supervisor **Gary Hunt**	Oversee loading and unloading Ensure Safe Operations Ensure machinery is maintained
Waste reception operative - Ferrous **Danny Hunt & Kerry Robbins**	Receive, inspect and validate ferrous metals
Waste reception operative – non-Ferrous **Danny Hunt**	Receive, inspect and validate non-ferrous metals
Waste reception operative – ELVs **Danny Hunt, Kerry Robbins & Steven Frampton**	Receive, inspect and validate ELVs
Machine operative(s) **Gary Hunt**	Sort, process and load/ unload wastes
Depollution operatives **Gary Hunt & Harry Teague**	Depolluting end-of-life vehicles
Driver(s) **Gary Hunt & Chris Sell**	Collection and dispatch of wastes
Yard Maintenance operative **Gary Hunt & Danny Hunt**	Carry out general site maintenance
Machinery and Equipment Maintenance Operative **Steven Frampton & Gary Hunt**	Carry out general servicing& maintenance of machinery/ equipment where not covered by a maintenance contract/service agreement.

2.7.2 Training Checklist

The skills and training needed for each post is identified in a Training Checklist. (See Appendix 9)

2.7.3 List of Staff and their Job Roles

A list of staff and their Job roles is maintained plus named deputies who can cover for them in their absence. (See Appendix 9)

2.7.4 Training matrix

Milber Salvage & Spares is committed to an ongoing training programme for its staff. A training matrix shows the current and planned competencies for each staff member. This is regularly viewed and updated as and when required. (See Appendix 9)

2.7.5 Training files

A training file is kept for each staff member containing evidence of training/ refresher training and competence checks. Training files are held in the Site Office.

2.7.6 Technically Competent Manager (TCM)

Ms Kerry Robbins is the current Technical Competent manager at Milber Salvage & Spares. The TCM will be/is present on site for at least the minimum number of hours required according to the current scheme guidance. Site attendance by the TCM is recorded in the Site Diary by noting the times of arrival and departure. Any change to the TCM will be notified to the Environment Agency, in writing, prior to the change.

1. Emissions and Monitoring

3.1 Emissions Management

3.1.1 Emissions to surface water and groundwater

The permitted area is constructed of concrete and surrounded by a secondary, bunded area so that any liquids are directed via the drainage system. The covered depollution area has its own bunding, capable of containing 110% of the largest tank, so that no liquids can escape. All potentially polluting liquids are stored with secondary containment. The site is protected by a system of interceptors and a silt trap and any trade effluent is discharged via the system under the terms of a Discharge Permit issued by the Environment Agency. (See Appendix 11)

3.1.2 Emissions of dust, mud and litter and other nuisances

Control of dust – All site activities are carried out on a concrete pad and the materials received are not likely to generate dust or bioaerosols in quantities which would give rise to harm to human health or nuisance to neighbours. Any dust which could accumulate is controlled by regularly cleaning of the working areas and access route.

Control of mud – Mud is unlikely to be a significant problem on the site due to the nature of the materials received and the good quality concrete surface which is cleaned regularly. Some mud could be tracked onto the highway from the access track by vehicles visiting the site but this is subject to inspections as part of the weekly site checks. Any problems would be addressed when identified.

Litter – The site activities do not give rise to quantities of litter. However, small quantities of mixed municipal, waste are generated by the site and could also be present in wastes received. This type of waste is contained in secure wheelie bins and regularly collected by a waste contractor.

Vermin and other Pests – The site does not accept biodegradable wastes and any of this type of waste that is generated is stored in secure containers and removed on a regular basis. The output of wastes is maintained so that they do not remain in one place for extended periods of time and the site is subject to frequent cleaning and weekly site inspections. If a problem was identified, appropriate pest control measures would be employed.

3.1.3 Emissions of particulate and fumes
The main source of particulates and fumes would arise from operating vehicles and plant or fumes from depollution activities. Vehicles and plant are regularly maintained to reduce this risk. Depollution activities which would give rise to fumes are minimised by use of specialist equipment and all fuels and oils are contained appropriately. Any spills of oils and fuel are cleaned up and contained. The site is also cleaned regularly to reduce the risks of fumes arising from residues.

3.1.4 Emissions of volatile organic compounds (VOCs)
VOCs are generated when operating plant or equipment and the storage and handling of petrol and air-conditioning fluids during depollution activities. VOC emissions from plant and equipment are minimised by ensuring productive operations and switching off engines when not being used. Regular maintenance reduces fuel use and the resultant emissions.

Petrol and air-conditioning fluids are extracted during the depollution process using specialist equipment designed to reduce the likelihood of VOC emissions to the atmosphere. All substances which could release VOCs are stored appropriately in labelled containers.

3.1.5 Emissions of substances introduced to the environment by pests – As detailed in 3.1.2, pests are controlled by careful management of the wastes and regular monitoring and cleaning. It is unlikely that substances will escape into the environment by this route.

1.2 **Odour Management** The site is situated on an industrial estate and the activities carried out on this site are not likely to give rise to odour nuisance. Biodegradable wastes are not accepted so the main sources of odour would be fumes from vehicles and plant or fumes from depollution activities. These are managed as above in 3.1.3 and 3.1.4.

1.3 Noise and Vibration Management The most significant sources of noise and vibration are likely to arise from machine operations, crushing, loading and unloading of metals and ELVs. The location of the site, on an industrial estate, means that the risk of causing nuisance to neighbours is significantly reduced. Despite this, Gary Hunt has taken additional measures to reduce noise/ vibration by:

- The use of a high metal wall surrounding the rear of the site where houses back onto the lane.
- There are large old trees behind the site which give good sound proving
- We have purchased a newer quieter machine.
- Our machinery is only used within our working hours.

2. Record keeping

The following table gives details of records kept relating to site operations. (Examples of site documentation are given in Appendix 10), retention times and their location

The following records are kept on site:

Record	Where	How long	Notes
Management System	Site Office	4 years	Updates will be completed annually and notified to the Environment Agency whenever changes are made
Fire Prevention Plan	Site Office (and Appendix 6)	4 years	Updates will be completed annually and notified to the Environment Agency whenever changes are made
Accident Prevention and management plan	Site office, (and Appendix 8) and box near site entrance	4 years	Updates will be completed sooner if required and notified to the Environment Agency whenever changes are made
Site Permit	Displayed in Site Office and Appendix.11	Lifetime of permit	Updates to be added as necessary
Site Diary Records	Site Office	6 years	The Site Diary records are currently kept in 2 separate books.
Weekly site checks	Site Office	6 years	
Details of TCM & copies of certificates	Letter (deemed competence) Continuing Competence certificates displayed in site office and held in the individual's Training File	Lifetime of permit	Continuing Competence certificates will be updated every 2 year CC period Any change in TCM to be notified to the Environment Agency prior to the change

Record	Where	How long	Notes
Training Checklist	Site Office and Appendix 9	Ongoing	Updated as necessary
Training Matrix	Site Office and Appendix 9	Ongoing	Updated as necessary
Employee Training Files	Site Office	Ongoing	Personal data will only be held as long as necessary in the event that an employee leaves.
List of key equipment and machinery	Site office and Appendix 7	Ongoing	Updated as necessary
Maintenance manuals, where available	Site office	Ongoing	Updated as necessary
Maintenance schedule(s)	Admin. office - wallchart	Ongoing	Updated as necessary
Records of non-conforming wastes and waste rejection	Site Diary – Site office	6 years	Incidents and non-conforming wastes and what has been done about it are recorded in the Site Diary
Any environmental incidents or instances where the permit conditions have been breached	Site Diary – Site office	6 years/ lifetime of permit	Incidents and what has been done about it are recorded in the Site Diary For anything that has affected areas outside the site, records will be kept for the lifetime of the site
Transfer notes for non-Hazardous wastes	Office and archive storage container	6 years	Input/ output information and records required by the Permit and other legislation
Hazardous Waste Register -	Office and archive storage container	6 years	Input/ output information and records required by the Permit and other legislation e.g.Hazardous waste consignment notes and returns from destination site
Duty of care checks and application of the Waste Hierarchy justifications	Office and Appendix 4	Ongoing	Records of Duty of Care checks for destination facilities/ carriers, brokers and dealers and hierarchy justifications

3. Reporting and Notification

The following information will be reported or notified to the Environment Agency:

- Any incidents or accidents which is causing or may cause pollution of the environment will be notified as soon as practicable and 'without delay'. (See also 2.4.1)

- Changes to site operations which would mean that the permit could not be complied with e.g. Changes to the operational area, transfers in ownership, process changes etc. will be notified to the Environment Agency and the relevant Permit variation, transfer application completed

- If operations stop temporarily for more than 3 months, the Environment Agency will be notified and also advised at least 14 days before operations recommence.

- Details of the Technically Competent Management for the site will be provided to the Environment Agency and any changes will be notified to them, prior to the change being made.

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