

Hallenbeagle Transfer Station and Material Recycling Facility

Pest Management Plan

October 2023

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Document Details

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Prepared by	Alice Shaw – Environment Permit Manager Geraldine Guiguet-Doron – Environment Permit Manager
Reviewed by	Andrew Jones – Environment & Industrial Risk Manager Christine Roos – Production Operations Manager
Approved by	Craig Mouatt – Processing Contract Manager
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October 2023	Version 1.0	Original Document to support environmental permit application for a Refuse Transfer Station, Material Recycling Facility and a covered bale storage area.



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Appendix A	QEMS Daily/Weekly Site Inspection Checklist
Appendix B	Amenity Complaint Investigation Form

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No.	Drawing	Reference
1	Site Location Plan	Hbg-LOC-1123-01
2	Site Permit Boundary	Hbg-PER-1123-01
3	Site Receptor Plan	Hbg-REC-1123-01



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1 SITE DESCRIPTION AND GENERAL MANAGEMENT

1.1 Introduction

- 1.1.1 Hallenbeagle Transfer Station and Material Recycling Facility (the site) is located at Cornwall Business Park, Hallenbeagle, Scorrier, Redruth, TR16 5EN at National Grid Reference (NGR) SW 72700 44778. The site location and permit boundary are presented in Figure 1 and 2 respectively.
- 1.1.2 The site is situated approximately 3.5km to the north east of Redruth town centre. Access to the site is from one of the Business Park roads which connects to the A30 via an overbridge and short section of road which serves some of the businesses at Scorrier. The Business Park Road forms the eastern boundary of the site. The main line railway forms the western boundary to the site, with the A30 dual carriageway just beyond this. The closest residential receptor is located approximately 25m north off Hallenbeagle Bridge Road.
- 1.1.3 This Pest Management Plan (PMP) is written to support an application for an environmental permit to operate a Refuse Transfer Station (RTS) with physical treatment, Clinical Waste Transfer Station (CWTS) and a Material Recycling Facility (MRF) at the site.
- 1.1.4 All SUEZ operations are controlled by an Integrated Management System (IMS) as described in the Operations Management Plan (Document reference 1.2).
- 1.1.5 This PMP is to be reviewed regularly by the Site Manager and the Environment and Industrial Risk (EIR) Manager to ensure it reflects the latest guidance, legislation and the site operations. As a minimum the PMP will be reviewed after a change of operations or after an environmental issue and following an accident on site or receipt of a complaint.

1.2 Pest Management Plan overview

- 1.2.1 This PMP is a working document, intended to be used as a reference document for operational staff on a day-to-day basis. SUEZ will implement the plan to ensure that all reasonable measures are taken to control pests. In the event that an adverse impact is identified, prompt action will be taken to identify the source and apply corrective measures. This document provides a schedule of actions that will be taken to minimise pest impact and details site management procedures for the management and monitoring of pests. A copy of the PMP is available as a hard copy on site and electronically for remote access.
- 1.2.2 This document provides a summary of the physical and management controls that will be employed to minimise pests at the site. It provides a site-specific assessment of the potential sources of pests, and the receptors it is likely to impact. The document also outlines the control measures including monitoring and contingency actions to be deployed at the site in order to prevent or minimise any infestation of pests.



- 1.2.3 The PMP will adopt a Source \rightarrow Pathway \rightarrow Receptor model with an emphasis on implementing effective and robust controls for pests at the earliest stages possible (i.e. at source).
- 1.2.4 The implementation and dissemination of this PMP will be the responsibility of the Site Manager, supported by other staff. The Site Manager can delegate certain tasks as required, although ultimate responsibility will remain with them.
- 1.2.5 A nominated deputy will be appointed for all times when the Site Manager is not on site. In such circumstances, it will be the nominated deputy's responsibility to ensure that the requirements of the PMP are adhered to.
- 1.2.6 The PMP is to be reviewed regularly by the Site Manager and the Environment and Industrial Risk (EIR) Manager to ensure it reflects the latest guidance, legislation, and the site operations. As a minimum the PMP will be reviewed after a change of operations or after an environmental problem/issue and following an accident or complaints on site.



2 DESCRIPTION OF WASTE ACTIVITIES

2.1 Specified Waste Management Operations

- 2.1.1 The site will operate as an RTS with physical treatment, a Clinical Waste Transfer Station (CWTS) and a MRF. The combined waste acceptance limit for the site will be 140,000 tonnes per annum. The maximum combined annual tonnage for the RTS and CWTS shall not exceed 100,000 tonnes and the annual tonnage for the MRF shall not exceed 40,000 tonnes.
- 2.1.2 The RTS will provide a facility for the storage and 'bulking up' of household residual waste (general waste), food waste, bulky waste, street sweepings and fly tipped waste collected by Waste Collection Authorities (WCAs), plus residual waste from SUEZ's network of Household Waste and Recycling Centres (HWRCs). The RTS will also accept waste from third party trade customers.
- 2.1.3 Non-hazardous and inert waste will be treated as part of the RTS. Treatment activities within the RTS will consist of manual sorting and separation. Street Sweeping will also naturally dewater. To allow flexibility treatment within the RTS could also consist of screening, baling, shredding or compaction of non-hazardous waste for disposal or recovery.
- 2.1.4 The CWTS will provide a facility for the storage and 'bulking up' of offensive healthcare and clinical waste. There will be no physical treatment of waste as part of this activity.
- 2.1.5 The MRF will provide a facility for the physical treatment of recyclable materials for onward transport to re-processing facilities. Recyclable materials will derive from kerbside collections, third party trade customers and SUEZ's network of HWRCs and Transfer Stations. The treatment includes manual and mechanical sorting/separation, screening, baling, shredding, compaction or 'bulking up' of waste.
- 2.1.6 In addition, there is a covered bale storage area to store waste bales and loose recyclable materials from the MRF.

2.2 Permitted Wastes

- 1.2.7 The waste types permitted to be accepted at the site are detailed in the Storage Plan (Appendix B) in the Operations Management Plan (Document reference 1.2).
- 2.2.1 The site is designed to receive the following wastes: -

Refuse Transfer Station

- Household and commercial waste collected by WCAs including:
 - Household Residual Waste (general waste)
 - Food waste
 - Bulky waste
 - Street sweepings (subject to limited water content)
- Fly tipped waste



- Residual waste from HWRCs
- Third party trade commercial waste

Clinical Waste Transfer Station

- Offensive Healthcare waste
- Clinical waste

Material Recycling Facility

- Dry mixed recycling (containing plastic, paper, card and cans)
- Glass

2.3 Process Description

- 2.3.1 Waste is unloaded in two distinct areas; the RTS (with clinical waste storage) and MRF. Visiting traffic for both areas is directed (via signage and separate entrances).
- 2.3.2 Waste materials for the RTS will be delivered in a variety of vehicles and will be directed to the RTS area inside the main building. Waste will either end tipped directly into the bays or stockpiles or waste will be deposited on the hardstanding in front of the relevant storage area where a loading shovel or suitable plant machinery will be operated to move the material into bays, stockpiles or container. Materials in the RTS building will be stored and loaded for forward disposal or recovery.
- 2.3.3 Residual waste from households and third-party trade customers will be delivered in Refuse Collection Vehicles (RCVs) whereas residual waste from SUEZ's network of HWRCs will be delivered in roll-on/roll-off (RO-RO) containers.
- 2.3.4 Food waste will be delivered by RCV and stillage equipped vehicles.
- 2.3.5 Street sweepings will be delivered by street cleaning vehicles and roll-on/roll-off (RO-RO) vehicles and will be tipped into a bay where it will naturally dewater prior to onward transport to other processing facilities.
- 2.3.6 WEEE will be delivered to site on a variety of vehicles ranging from small vans to large rigid HGVs. Items will be manually unloaded, or utilising liftings aid where applicable into the designated storage areas.
- 2.3.7 Offensive health care and clinical waste will be delivered by box vans and RCVs. Healthcare and clinical waste will be stored within a designated storage area inside the main building.
- 2.3.8 Non-hazardous and inert waste will be treated as part of the RTS. Treatment activities within the RTS will consist of manual sorting and separation. Street Sweeping will also naturally dewater. To



allow flexibility treatment within the RTS could also consist of screening, baling, shredding or compaction of non-hazardous waste for disposal or recovery.

- 2.3.9 The material in the bays will be removed from the site using the site mobile plant and transferred into bulk haulage vehicles inside the main building. WEEE will be removed from site using a variety of vehicles including HGV's and RO-RO vehicles. Clinical waste is removed from site in wheelie bins which are manually moved into vans from the storage area.
- 2.3.10 Recyclable materials for the MRF will be delivered in a variety of vehicles including RCVs, bulk haulage vehicles or RO-RO vehicles and will be tipped on the floor in each bay. The materials will then be transferred onto the conveyor system for processing and will be baled (excluding glass) prior to storage on site. Bales of recyclable materials will be stored in the designated bale storage area prior to forward recovery.

2.4 Operating Hours

2.4.1 The operating hours for the site will be limited to the following hours, set out below:

•	Monday - Friday:	07:00 - 21:00
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• Saturday: 07:00 – 13:00



3 SOURCE, PATHWAY, RECEPTORS CHARACTERISATION

3.1 Types of Pests

Vermin

3.1.1 Vermin (principally rodents) are generally attracted to sewers, culverts, pipes and areas of abundant vegetation. Vermin are also very attracted to odours from waste streams that contain putrescible materials.

Insects

- 3.1.2 There are around six insect species that have the potential to cause regular and significant problems on and around waste management facilities. Fly larvae occur in damp, decaying organic waste. However, each species will have a preferred niche in terms of temperature, moisture levels and nature of the material. Eggs for most species typically hatch within 1-2 days. To develop, larvae take from 3 days in summer to up to a month in winter. Subsequently, there is an increased chance of fly problems occurring where waste is stored for a prolonged period of time.
- 3.1.3 The most common species associated with waste management facilities which have the potential to generate complaints are outlined in Table 1.

Fly species	Typical pest status	Notes
Common housefly (Musca domestica)	Can cause widespread and severe problems	Larvae found in poultry, pig, and calf manure, and in refuse. Adult readily disperses and enters buildings.
Lesser housefly (Fannia canicularis)	Can cause widespread and severe problems	Larvae found in poultry manure, and in refuse. Adult readily disperses and enters buildings.
Blow flies: Bluebottles / Greenbottles (Calliphora / Lucilia)	Localised problems only	Larvae found in carrion and faecal material, commonly associated with putrescible waste. Adults tend not to disperse far.
Stable flies (Stomoxys calcitrans)	Localised problems only	Larvae found in manure of large animals, e.g. cattle and pigs. Adult is blood-feeding, and tends not to disperse far.
Fruit flies (Drosophila spp.)	Localised problems only	A small (2mm) fly. Larvae found in rotting vegetation or vegetable waste, e.g. green- waste composting. Tends not to disperse far.
Cluster flies	Localised problems only	The larvae of these flies are not found in

Table 1 - Main Fly Pest Species



Fly species	Typical pest status	Notes
(Pollenia rudis, Eudasyphora cyanella, Musca autumnalis)		livestock or waste facilities, but the adults do enter buildings in the autumn, and may be confused with houseflies by complainants.

Birds

- 3.1.4 Many different bird species may be considered a hazard or annoyance including Corvids, Pigeons, Geese, Starlings and Gulls. Birds are likely to be attracted by putrescible waste stored at a site. The varying species of Gull could often be the primary source of hazard or annoyance at a site. A variety of methods of control are required, especially as gulls are a reasonably intelligent species and will acclimatise to a single control measure used in isolation quite quickly.
- 3.1.5 There are also seasonal variations that will affect the numbers of birds on site. If the birds are nesting during the spring/summer months and require food for their chicks or if food availability is scarce in winter, this may make the birds more desperate to find food and bring increased numbers.

3.2 Source of Pests

3.2.1 This section provides an inventory of all potential pest generating sources at the site. These are identified as follows.

Food Waste

3.2.2 Food waste will be collected daily over a rolling weekly period as per the WCA Contract specification and will include putrescible components. Therefore, waste will be 1 week old when it arrives on site. Food wastes will be stored within bays inside the main building equipped with fast acting roller shutter doors. Food wastes are only stored on site prior further transport to another site for processing. Food waste are dispatched from site into covered articulated lorries. No processing of food wastes will be undertaken on site. Food wastes will be stored within bays inside the main building for a maximum of 48 hours (72 hours over a bank holiday or weekends) and is considered a medium risk in terms of pests.

General Municipal/ Residual black bag

3.2.3 General municipal waste accepted at the site is from municipal kerbside collections, commercial waste from third party trade customers and waste deposited by residents from SUEZ's network of HWRCs. General municipal waste will be collected by RCVs on a fortnightly basis and therefore the waste will be up to 2 weeks old when it arrives on site. General municipal wastes are only stored on site prior further transport to another site for processing. General Municipal waste are dispatched from the site into covered bulked haulage vehicles. No processing of this type of wastes will be undertaken on site. General municipal wastes will be stored within the transfer station building in a separate bay for a



maximum of 48 hours (72 hours at weekends). General municipal waste will contain a certain percentage of putrescible waste and therefore the risk of pests is considered to be medium.

Recyclable and Bulky Wastes

3.2.4 Dry recyclates and bulky wastes may be lightly contaminated with residual waste, however it is considered that the potential for a pest source is negligible and as such is not discussed further in this PMP.

Healthcare Waste

3.2.5 Healthcare waste will be delivered to site in fully sealed bags. Hazardous (High grade) clinical wastes are stored in the clinical waste building in sealed wheelie bins for a maximum of 1 week. Offensive (Low grade) wastes are stored in the main building for a maximum of 72 hours in bags within a dedicated bay. The risk of pests from such waste is considered to be low.

3.3 Release Points and Pathways

- 3.3.1 Vermin It is possible that vermin may pass from premises to premises overground or by establishing burrows under the boundary fence. These may be easily identified and blocked.
- 3.3.2 Insects Most adult flies stay close to their breeding sites. However, a proportion will disperse away and has the potential to cause a nuisance at receptors. Houseflies are capable of dispersing over distances of several kilometres, although problems seldom occur at distances greater than 2-3 km from the source. Significant problems will generally occur within 500m of the source. Dispersal factors can vary, but are mainly influenced by high levels of fly breeding at the source and weather conditions.
- 3.3.3 Birds Putrescible waste streams will be stored in the main building, however birds may hover around the waste facility and settle on rooftops awaiting any opportunity to set on a food source.

3.4 **Receptors Identification**

3.4.1 Key potentially sensitive receptors are detailed in Table 2 below and identified in Figure 3.

Table 2 - Sensitive Receptors

No.	Receptor	Category	Distance (m)	Direction from site
1	Cormac Solutions Depot	Commercial/Industrial	15	East
2	Cornwall Business Park West	Commercial/Industrial	25	South West



3	Cornwall Business Park	Commercial/Industrial	315	South West
4	Commercial units in Wheal Rose	Commercial/Industrial	175	West
5	Radnor Industrial Park	Commercial/Industrial	740	South West
6	Roddas's Cornish Clotted Cream Creamery	Commercial/Industrial	600	South West
7	Businesses at the old saw mills	Commercial	530	South West
8	Logan Electronics	Commercial	85	South
9	The Fuel Depot	Commercial	100	North West
10	Conway Bailey Transport	Commercial	340	North West
11	Residential property off Hallenbeagle Bridge Road	Residential	25	North
12	Caravan Park off Sawmills Lane	Residential	75	North East
13	Hallenbeagle Farm	Residential/Agricultural	140	South East
14	Residential properties off Sawmills Lane	Residential	180	South West
15	Residential properties east of Sawmills Lane	Residential	325	South East
16	Residential properties west of Sawmills Lane	Residential	485	South West



17	Residential properties in Scorrier	Residential	525	South West
18	Killifreth Farm	Residential/Agricultural	760	South East
19	Kirbartley Farm	Residential/Agricultural	400	South East
20	Pitslewren Farm	Residential/Agricultural	900	South East
21	Primrose Farm	Residential/Agricultural	600	East
22	Part Pitslewren Farm	Residential	845	South East
23	Residential properties in Wheal Rose	Residential	600	South West
24	Boscawen Farm	Residential/Agricultural	540	North East
25	Glencoe Farm	Residential/Agricultural	540	North West
26	Residential properties south of Blackwater	Residential	665	North West
27	Green Acres Farm	Residential/Agricultural	780	North
28	Boscawen Cottage	Residential	675	North East
29	Fays Touring Park	Recreational	660	South East
30	Blackwater Bypass (A30)	Public Highway	100	West



31	Railway Line	Railway Infrastructure	15	West
32	Central Cornwall Allotments	Allotments	975	East
33	Deciduous Woodland	Priority Habitat	370	East
34	Deciduous Woodland	Priority Habitat	350	South West
35	Deciduous Woodland	Priority Habitat	765	East
36	Deciduous Woodland	Priority Habitat	800	South East
37	Deciduous Woodland	Priority Habitat	485	South East
38	Deciduous Woodland	Priority Habitat	490	South East
39	Deciduous Woodland	Priority Habitat	551	South East
40	Deciduous Woodland (Unity Wood)	Priority Habitat	870	South East
41	Deciduous Woodland	Priority Habitat	525	South West
42	Deciduous Woodland	Priority Habitat	600	South West
43	Deciduous Woodland	Priority Habitat	605	South West
44	Deciduous Woodland	Priority Habitat	670	South West



45	Deciduous Woodland	Priority Habitat	720	South East
46	Groundwater (Secondary A)	Groundwater	-	Beneath Site

3.4.2 The sensitive receptors will be reviewed at least annually and following complaints to site or to the Environment Agency (EA).



4 PEST MANAGEMENT CONTROLS

- 4.1 Waste Enquiries
- 4.1.1 Prior to setting up any new contract, the agreed procedures will determine the acceptability of the waste based on the information supplied by the customer. The customer should complete a Waste Enquiry Form and return it to the Site Administrator.
- 4.1.2 Before the waste arrives at site, a copy of the completed Waste Enquiry Form will be made available to the site so that the Site Manager is aware of and can make provision for any special handling requirements (including pests such as vermin and insects) as detailed in the form.
- 4.1.3 A contract request form will be completed by the Sales Co-ordinator and forwarded to the relevant Site Administrator so that a contract can be set up before the waste arrives on site. This ensures the weighing exercise will be very quick to reduce the period of time incoming vehicles spend on site before depositing of waste.
- 4.1.4 The continued acceptability of all waste contracts will be reviewed annually, or in line with changes to legislation.
- 4.1.5 As the waste received at the site is via a long term contract and similar to other contracts within SUEZ, a high level of operator experience is shared in handling the feedstock.
- 4.2 Waste Acceptance
- 4.2.1 The site operators will ensure that capacity is available on-site before accepting waste. In particular, if the waste storage area is full, all inbound loads of waste must be diverted until the quantity of waste on site has been reduced. If loads are turned away, then this will be recorded in the site diary.
- 4.2.2 Only waste types detailed within the environmental permit will be accepted at the site.
- 4.2.3 Upon arrival, all documentation accompanying the load shall be checked at the weighbridge, and shall include, but not be limited to the Carriers Certificate of Registration and Duty of Care Waste Transfer Note.
- 4.2.4 Where practicable, the Weighbridge Clerk will complete a visual inspection of each load. The main inspection will be in the reception area including an assessment of pests. Site staff will visually inspect the waste, as it is unloaded from the vehicles and complete the Waste Acceptance Form.
- 4.2.5 If vermin or insects such as flies were identified within loads then the site may choose to reject them if it is thought to cause ongoing compliance issues.
- 4.2.6 If any material delivered to site was thought to have the presence of vermin or insects then this information would be fed back.



- 4.2.7 In order to reduce impact of insects such as flies during vehicle movements the site staff ensure that all waste vehicles fitted with sheets are sheeted when entering and leaving site.
- 4.2.8 During collection from the households, the collection crews will be making checks of the material to ensure that only acceptable contracted wastes are collected. Checks for the presence of pests within the waste are also undertaken during collection and appropriate action will be taken if the material is deemed not to be acceptable at the site.
- 4.2.9 Should it become necessary, the Site Manager will arrange for the pest contractor to visit the site to carry out further control works.

4.3 Waste Storage and Building Enclosure

- 4.3.1 The primary control of pests on site is that all wastes will be discharged and stored within an enclosed building that is equipped with fast acting roller shutter doors.
- 4.3.2 The majority of contracted wastes received at site will be a maximum of 2 weeks old on arrival at site as the waste is collected on a fortnightly basis (this will only be influenced by the frequency of which a resident places their waste kerbside for collection). The only exception to this is food waste which is collected on a weekly basis and therefore will be a maximum of 1 week old.
- 4.3.3 The majority of the putrescible wastes on site will be stored for a maximum of 48 hours (72 hours during bank holiday and over weekends). The maximum storage time for street sweepings is 2 weeks due to the small quantity received at any one time. Offensive waste will be stored for a maximum of 48 hours (72 hours during bank holiday and over weekends) and clinical waste for a maximum of 1 week. The short turnaround time of putrescible wastes stored on site will minimise the likelihood of scavenging or potential for infestations to develop. Should the situation occur where a load does contain vermin or insects (such as flies) then the site may choose to reject the waste load if it is thought that this will cause ongoing compliance issues.
- 4.3.4 The monitoring of incoming waste will be recorded as vehicles weigh on and off at the weighbridge. This data will be used to track all inputs and outputs of waste to ensure that the first in first out policy is adhered to and therefore ensure the turnaround period of putrescible waste is met. The data will also be used to monitor waste volumes on site and ensure that the amount of putrescible waste that is accepted at the site does not exceed the maximum storage limits.
- 4.3.5 Visual inspections of the waste storage areas will also be undertaken by the Site Manager to ensure that the volume of waste is not exceeded.
- 4.3.6 All voids are sealed within the main building to reduce the opportunity for nesting vermin such as rats/mice. The general design of the internal areas has been considered so as to reduce the amount of inaccessible areas for cleaning, the push walls will be sealed to prevent waste accumulation behind them. Any internal surfaces e.g., ledges will be sloped to prevent the accumulation of waste material.



Within the TS building, greedy boards/ flashing to be installed at top of push wall to prevent waste overtopping into void between push wall and building envelope.

4.4 Litter

4.4.1 The control of litter is also important to reduce the potential for insects, pests and vermin. All vehicles delivering and removing waste at the site, will be required to be sheeted or enclosed. The site entrance, gates and perimeter fences will be inspected daily, by a member of staff for windblown litter. Where litter is blown outside of the boundary, it will be collected as soon as possible.

4.5 Housekeeping

- 4.5.1 The site will be subjected to a good housekeeping regime which assists with the aim of proactive management and associated environmental compliance. Daily inspections will be undertaken at the site via the Daily/Weekly Checklist (Appendix B) or the Vision App. The checklist will be completed by the Site Manager or designated staff and signed off at least weekly by the Technical Competent Manager (TCM) for the site. All employees will be required to report any vermin/pest issues around the plant, yard or vehicles immediately to the Site Manager. Any incidents will be recorded in the Site Diary and remedial action instigated as quickly as possible.
- 4.5.2 Regular cleaning will be undertaken in the waste storage areas, including floors and bays to ensure the removal of any residues or debris to reduce the potential of pests.
- 4.5.3 In addition to operating a first in and first out policy the waste storage areas will be regularly emptied to allow it to be cleaned thoroughly.

4.6 Staff Training

4.6.1 Staff training will be a key aspect of ensuring that pest can be controlled through effective management during daily operations. All site operatives will therefore be trained via toolbox talks to deal with pest management issues. Annual refresher toolbox talks will ensure that the requirements of the PMP are reinforced.

4.7 Vegetation

4.7.1 Vegetation is kept in control around the facility and all grassed areas regularly reviewed and cut when appropriate to reduce the likelihood of vermin nesting.

4.8 Drainage

4.8.1 Drainage is regularly inspected and cleared as and when required to prevent the potential for standing water which may attract vermin.



4.9 Specific Bird Control Measures

- 4.9.1 The following measures are deployed by SUEZ staff or a designated contractor to actively deter any birds on the site:
 - Increased use of falconer with birds of prey
 - Acoustic system replicating distress calls
 - Air propane Canon
 - Agrilaser handheld laser gun
 - Replica birds of prey install in critical positions around the site
- 4.9.2 The above management techniques will be implemented at random intervals to deter birds from complacency to the applied technique.
- 4.9.3 SUEZ will review new technologies for bird management at regular intervals and introduce them where appropriate.
- 4.10 Specific Vermin Control Measures
- 4.10.1 In addition to the regular monitoring and checks carried out by site staff, approved pest control contractors are engaged to visit site on a monthly frequency as a minimum. The works undertaken by the contractor may include those detailed below;
 - Baiting inside and outside the main building as well as on the neighbouring administration buildings
 - Collection and disposal of dead vermin
 - Written reports provided and filed at site after each visit to site detailing findings and any actions undertaken and/ or recommendations for improvement.

4.11 Specific Fly Control Procedures

- 4.11.1 Effective fly management can be achieved through rigorous turn-around of waste and frequent cleaning. Waste storage times outlined above in Section 4.3 allow this to be achieved.
- 4.11.2 The Site Manager will record fly activity within the site diary where identified.
- 4.11.3 The EA guidance outlines fly management techniques, with particular attention brought to the use of non-chemical techniques as a first priority where appropriate. This is also imposed in the COSHH Regulations 2012, where the use of non-hazardous pest control techniques is identified as being favoured over those which could potentially be harmful, such as pesticides.



- 4.11.4 Flies are controlled as and when required by an approved Pest Controller using non-chemical techniques where possible. In circumstances where this is not possible then suitable chemical spray (insecticide space spray or surface spray) to treat inside and outside areas is completed.
- 4.11.5 Where additional control is required, in line with the IMS the pest control contractor will be required to use electrical fly control methods or spray the waste / building, as necessary.
- 4.11.6 The proposed control mechanisms will be reviewed on an annual basis to assess their effectiveness. Any significant changes will be communicated to the EA in a format of their choosing.



5 MONITORING/ SITE CHECKS

5.1 Overview

- 5.1.1 Regular monitoring is carried out to assess the following;
 - Confirmation that any vermin, birds and insects are under control
 - Assessment to confirm compliance with the environmental permit
- 5.1.2 The presence of pests is regularly assessed by site staff and any issues related to vermin, birds or insects identified reported to site management for investigation.
- 5.2 Daily/ Weekly Checks
- 5.2.1 Daily inspections are carried out by Site Management and recorded on the daily/ Weekly IMS checklist (Appendix B) or the Vision App. The daily inspections include checks for the following;
 - Pests
 - Vegetation
 - Drainage
 - Infrastructure
 - Litter
- 5.2.2 Any issues or non-conformances identified will be clearly marked on the inspection form.
- 5.2.3 Should a pest nuisance be identified during a routine assessment then an investigation on the source of the nuisance will be undertaken.
- 5.2.4 Should the pest nuisance be attributed to the site, then the site manager will be informed immediately and remedial measures will be taken. Remedial actions may include but be not limited to:
 - Checking storage areas to identify the source of the nuisance to a particular waste
 - Removal of the waste causing the nuisance at the earliest opportunity and within 24 hours
 - Cleaning of storage area/s
 - Using either non-chemical techniques or suitable chemical spray (insecticide space spray or surface spray) to treat inside and outside waste areas
 - Arrival of pest control contractor on site



6 SPECIALIST CONTRACTORS

- 6.1 Routine Inspections
- 6.1.1 In addition to the regular monitoring and checks carried out by site staff, approved pest control contractors are engaged to visit site on a monthly frequency as a minimum. The works undertaken by the contractor are detailed in Section 4.
- 6.2 Management of Contractors
- 6.2.1 All records of inspections and controls by Specialist Contractors are retained on file on site.
- 6.2.2 Regular review meetings will be held with the Specialist Contractors.
- 6.2.3 Site Management will ensure that Specialist Contractors complete site visits in line with the agreed frequency. Where inspections are not completed a review of the performance of the contractor should be completed by Site Management who will take appropriate action.



7 COMPLAINTS & ENGAGEMENT

- 7.1 Investigations and records
- 7.1.1 All complaints and queries received at the facility or via the regulatory bodies including the Environment Agency and Local Authority will be logged in accordance with the integrated management system as soon as practicably possible. Where possible, as much information and detail about the complaint will be recorded, whether this is from the relevant authority or complaint direct to site. All complaints logged will be subject to investigation and complainants responded to as necessary following completion of the investigation. All responses will be through trained and experienced staff.
- 7.1.2 Complaints management will be undertaken in line with IMS Amenity Complaints. The first stage of complaints investigations is to complete a basic screening exercise to determine if the site is the likely cause and if further, more detailed investigations are required. Once determined that further investigations are needed an off site and on site pest investigations are carried out using the Amenity Complaint Investigation Form included within Appendix B.
- 7.1.3 Complaint investigations are carried out by site management.
- 7.1.4 Should a complaint be received out of operational hours of a current / ongoing issue then site management shall try to attend site as soon as possible to carry out an investigation, dependent upon availability.
- 7.1.5 Where necessary, the Environment Agency shall be informed of the investigation findings so they can relay this back to the complainant.
- 7.1.6 SUEZ will ensure that the complainant has relevant contact details for the site (i.e. the Site Manager). SUEZ will be in regular contact with the complainant and / or the EA where necessary, whilst any pest issue is being investigated or remediated.
- 7.1.7 An evaluation of the effectiveness of the techniques used will be carried out on completion of any remedial measures or if the complaints persist. Records of the above will be retained by site for future reference.
- 7.2 Non-conformances and complaints
- 7.2.1 The investigation will determine the source of the complaint and then the cause of the pest nuisance.
- 7.2.2 If a nuisance can be directly related to the site, corrective actions will be identified and programmed for remediation. Actions taken in response to any pest complaint will be recorded on the Amenity Complaint Investigation form.
- 7.2.3 Corrective action procedures are documented in IMS Non-conformance, Corrective and Preventive Actions. A list of all policies and procedures is included in the Operations Management Plan, which forms part of the Environmental Permit.



7.2.4 If remediation cannot be completed within 24 hours then the non-conformance and remedial actions shall be raised on the SUEZ Compliance and Audit System (COMPAS).

7.3 Pest Complaints and management review

- 7.3.1 All complaints will be investigated by the Site Management including but not limited to a review of the number of complaints, weather conditions, investigations and remediation works. If required, the Operations Management Plan (Document reference 1.2) and PMP shall be updated to reflect any changes made to the management procedures on site following the review.
- 7.3.2 Site Management and the EIR Manager will review all procedures for the facility as necessary against other SUEZ operations and management procedures as well as industry practice, guidance and legislation to ensure continued best practice is carried out at the facility. Any amendments to practices on site will be reflected in updates of the Operations Management Plan and the PMP.
- 7.3.3 All complaints received by the site are recorded on Richmond. All pest complaints are reported to the EIR Manager and communicated to relevant parties within SUEZ as part of the EIR Department's monthly review.
- 7.4 Community Engagement
- 7.4.1 SUEZ operates an open communication policy with residents and businesses surrounding its sites and will engage with them if deemed necessary.
- 7.4.2 If necessary following received complaints, SUEZ will engage and communicate with its neighbours to improve understanding of possible pest issues. This will include detailing the efforts being undertaken to control pest; and importantly the actions being taken in response to their complaints.
- 7.4.3 Should any problems associated with pest be identified (either by SUEZ or through external sources), SUEZ would engage with those surrounding the site to ensure that they are kept up to date and have means of communicating with SUEZ through an appropriate communications strategy established by the communications team and in agreement with the client. This may include letter drops, visits to the site, open community meetings, social media updates and if appropriate and in agreement with the local residents and political representatives, and if necessary, the establishment of a Community Liaison Group (CLG).
- 7.4.4 Should pest nuisance be identified from external sources which are thought may have been related to complaints received or likely to cause complaints, then the site would consider contacting those responsible for the nuisance if possible to establish communication in relation to those activities.



Recycling and recovery UK

Appendix



Appendix A – Daily/Weekly Site Inspection Checklist

DAILY INSPECTION (GENERAL)

Facility Name:



Recycling and recovery UK

Week Commencing:

Performance Standard	Hours to Rectify	Inspected Item	Mon	Tue	Wed	Thur	Fri	Sat	Sun	тсм	CAR Ref.
		Inspected By (Initial):									
A1	1	Have there been any Health and Safety issues on site?									
A3	3	Have all open top vehicles leaving the site been netted or sheeted before leaving the loading area?									
A5	72	Have all containers and Suez vehicles which carry Contract Waste got the correct logos in a clean and visible condition?									
A6	3	Has the site closed? If so, was the Contingency Plan followed?									
A9	None	RTS and MRF only : Have there been any occaisions when the volume of trade waste on site has prevented Contract Waste being accepted or stored?									
A10/D12	24	Is there enough capacity in all containers, cages and storage bays for Contract Waste until your next collection?									
A10/D12	24	At any point in the last 24 hours has there been insufficient capacity for Contract Waste?									
A11	24	Are all permanent staff wearing uniform with a Suez logo?									
B1/B2/B3/B5/B 6/D15	1	Did the Weighbrige Operator complete the Weighbridge Inspection Checklist at the end of the last operational day? If so, were all non- conformances reported to helpdesk?									
C3/C4	3	Have there been any accidents involving a member of the public or any accident classed as 'RIDDOR' of which the helpdesk have not been informed?									
D3	24	Are there sufficient working lights on site to provide the Service? Are those lights fully operable with no flickering and in good condition?									
N/A	N/A	Are all handrails on bays/steps undamaged? Are all containers in good condition?									
D4	24	Does the Site Diary contain the printed name of the person responsible for the site today?									
D6	1	Are all perimeter fences and gates in good condition and is the site secure?									
D8	24	Are all signs in place and in a clean and legible condition? Are all signs presented in accordance with the Traffic and Signage Plan?									
D9	72	Is the Site Diary in place, completed and filled in correctly?									
D11	1	Has there been any failure to follow the HWRC Contract Waste Checking Procedure?									
D13 (1)	1	Have any spillages of Contract Waste presenting a health or safety hazard been cleared promptly?									
D13 (2)	3	Have any spillages of Contract Waste been cleared in accordance with the SOP?									
D14	3	Are fridges and freezers stored in compliance with the SOP and is there adequate capacity until the next collection?									
D16	72	Has there been any unauthorised access to the site, if so, have the consequence been dealt with in accordance with the SOP?									
D17	72	Have all required checks and maintenance for plant and equipment on site been completed?									
D18	24	Are all welfare and toilet facilities available and maintained to the standards required by the SOP?									
D19	24	Has Contract Waste waste been removed or treated in accordance with the Environmental Permit for the site?									
D21	72	Is the facility reasonably free of pests and vermin?									
D22	24	Has any fly tipping or litter within the site or 5m of its boundary been removed?									
D23	24	Has any graffiti or unauthorised notice been removed and the area cleaned/repaired?									
D24	24	Have all Authorised Users been made aware of site rules?									
D25	24	Is all Household Hazardous Waste stored safely and securely and in line with the Environmental Permit?									
D26	3	Are there sufficient staff on site?									
E1	None	Has their been any breach of policies and procedures or Good Industry Practice of which you are aware?									

N/A	N/A	Has there been any attempted private trade entry?					
N/A	N/A	Has the site infrastructure (buildings, fencing, yard, tipping floor walls etc) been inspected and found to be satisfactory?					
N/A	N/A	Are all interceptors in good working condition, free from blockage and with adequate capacity until the next scheduled maitenance?					
N/A	N/A	Has there been any breach of waste acceptance procedures, waste transfer or duty of care procedures?					
N/A	N/A	Are all fuel tanks or other bunded storage vessels in good working order, free of visible leakage and damage?					
N/A	N/A	Is the spill kit available and complete?					
N/A	N/A	Is all emergency and fire fighting equipment available, complete and operable?					
N/A	N/A	RTS and Landfill only : Is the odour supression system operating satisfactorily?					
N/A	N/A	Are all systems and procedures for controlling dust, noise and odour in place, operable and complied with?					
N/A	N/A	Are there any issues with fixed or freestanding structures?					

Key: ✓ Satisfactory; X = Action required; NI = Not Inspected; NA = Not Applicable

Note:Inspection should be completed daily on days when the facility is operationalIf non-compliance is minor and resolved the same day, comments to be recorded on this form, in the Site Diary and Helpdesk.Otherwise a Corrective Action Request (CAR) can be raised with CAR reference recorded in right hand column.

TCM Attendance (hours):

TCM Signature	: :
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Comments:

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Monday		

|--|

Wednesday		

Thursday

Friday		

Saturday				
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Sunday		
Sunday	y	

Other		
Other		



Appendix B - Amenity Complaint Investigation Form



THIS FORM MUST BE COMPLETED FOR ALL AMENITY COMPLAINTS THAT REQUIRE AN INVESTIGATION IN LINE WITH IMS 3.36B. IF MORE THAN ONE OF THE SAME TYPE OF COMPLAINT IS RECEIVED IN ANY ONE DAY, THEN ONE INVESTIGATION FORM CAN BE USED TO COVER ALL COMPLAINTS OF THE SAME NATURE.

1. Investigating Manager/Supervisor

A) Name		B) Position	
C) Location*	*Note: this is the SUEZ loca	tion the complaint relates to	

2. Complaint Type/Location

This section looks at the type of complaint that has been received, as well as the location it was made from.

	Alleged issue:	Complaint made	: Investigation:		
A) <u>When</u> did the complaint and investigation occur?	Date: Time:	Date: Time:	Date: From (time): To (time):		
*Note: the issue may have been experienced by the complainant before they made the complaint	Have any other related complaints been received within the last 7 days? Yes □ No □ If yes, provide basic detail:				
 B) <u>What</u> type of amenity complaint has been made? *Note: tick all that relate 	Odour □ Dust □ Noise □ Litter □ Basic description of (e.g. type of odour)	M P L C If amenity issue:	lud or Debris □ ests □ ight □ ther □ other, please detail:		
C) <u>Where</u> was the complaint made from?	Full address (if known):				
*Note: this is the complainant's location. The exact location may not be provided if the complaint has been received via the environmental regulator or local authority	Postcode (if known): If the above are unknown, then provide the approximate area of the complaint:				



3. Weather Conditions

Weather conditions at the time of the alleged issue and during the investigation are important. Some weather conditions can cause amenity issues to be worse, so it is important to provide details where they are known.

A) <u>What</u> were the weather conditions like at the time the complainant experienced the issue?	General Description:
*Note: you may only be able to accurately identify this if you have a weather station on site	Temperature (°C):
	Raining? Yes ∐ No ∐ Ground conditions: Wet □ Damp □ Dry □
B) <u>What</u> were the weather conditions like at the time of the investigation?	General Description:
Ŭ	Wind (speed and direction):
*Note: you can use weather data from	Temperature (°C):
a weather station, the Met Office and	Raining? Yes □ No □
your own observations	Ground conditions: Wet □ Damp □ Dry □

4. Off-Site Investigation

It is important to attend the complainant's location to assess whether an impact is occurring. Guidance on what to look for is available in IMS 3.36b.

A) What is the amenity impact	Amenity impact? Yes □ No □			
at the complainant's location?	If yes, detail the severity. For odour, refer to the odour intensity and extent details in Appendix A.			
	For other amenity issues, provide a basic written description:			
*Note: identify whether there is any impact being caused and indicate the severity				
 B) Note any other sensitive receptors in the complainant's location 	*Note: refer to housing, parks, pubs etc			
C) Are there any other actual or potential sources of amenity impact in the local area?				



*Note: if another source is identified causing an amenity impact, then ensure this is detailed

5. On-Site Investigation

Following the off-site investigation, it is essential to assess what was occurring on site. If a complaint is received or investigated after the alleged issue, then it may be difficult. If this is the case, then provide an overview of the operations that were occurring at the time of the alleged issue. Guidance on what to look for is available in IMS 3.36b.

A) Site activities *Note: CCTV footage may be useful in determining site conditions at the time of the alleged issue. If an amenity issue has not been traced back to site,	If an amenity impact was noted in section 4A, then state whether this has been traced back to site operations. Focus on the following areas: Waste inputs/outputs Waste storage Waste treatment processes Condition of infrastructure			
then it is still useful to provide detail of site conditions at the time.				
	If the amenity impact can be traced back to site, state whether this was as a result of a non-conformance:			
B) Non-conformance	If yes, provide detail:			
	*Note: you may need to refer to the Permit and site-specific management plans			
C) Corrective action	If a non-conformance has been identified, then state what has been done to remediate this:			
*Note: provide COMPAS CAR reference number if the required action has been raised as a CAR				

6. Supporting Information & Evidence

Supporting information can be useful in building a picture of the incident.

A) Attach any photos or videos



11. Appendix A

Odour Intensity	Odour Extent (assuming odour is detectable)
0: No detectable odour	1: Local and impersistent (only detected during brief periods (wind drops/blows
1: Very Faint Odour (barely detectable, need to stand still and inhale facing into the wind)	2: Impersistent as above, but detected away from site boundary
2: Faint Odour (odour easily detected while walking and breathing normally, possibly offensive)	3: Persistent, but fairly localised
3: Distinct Odour	4: Persistent and pervasive up to 50 m from site boundary
4: Strong Odour	5: Persistent and widespread (odour
5: Very Strong Odour	detected >50 m from site boundary)
6: Extremely Strong Odour	



Figures



Figure 1 – Site Location Plan



B4m Ph		BS S	Shaft	50 100 150	2000 300 Metres 1:5800	400	599
Notes 1. Reproduced from the Ordnance Survey Map with the permission of the Controller of Her Majesty's Stationary Office, Crown Copyright, Licence Number 100004910. Hallenbeagle TS and MRF perm	nit boundary						
Sie SUG Darwer, Resource Recovey Park, Lower Ecciebtal Road, Darwen, BB3 ORP Tel (01254)819700, Fax: (01254)819748, Email: richard bisset@iala.co.uk	site Hallenbeade Transfer Station and	scale 1:5000 @ A3	Drawn by	Rev	subject		date
	Material Recycling Facility	Date November 2023	JA				
	Tile	Drawing Ref Hbg-LOC-1123-01	Checked by				
			GGD				



Figure 2 – Site Permit Boundary





Figure 3 – Site Receptor Plan

