Environmental Working Plan

Resource & Energy

Biffa Waste Services Ltd.

POLYMERS REDCAR HDPE3 WORKING PLAN

TABLE OF CONTENTS

APPENDICES

A. Drawing 01 – Environmental Permit Boundary
B. Drawing 02 – Site Layout Plan
C. Drawing C-1000 – Proposed Drainage Plan
D. Drawing 03 – Fire Prevention Plan
E. Procedure for Waste Acceptance v1.2_HDPE3
F. Redcar HDPE3 Fire Prevention Plan

1. GENERAL CONSIDERATIONS

1.1 Scope and Purposes

1.1.1 This document describes the management and operational arrangements for the Biffa Waste Services, R&E division Polymers Facility operating at PL5 Road, Wilton International, Redcar, Cleveland, TS10 4RG.

1.1.2 This Working Plan has been produced to support the Integrated Management System (IMS) and Environmental Permit in compliance with the requirements of the Environmental Permitting (England and Wales) Regulations 2016 (as amended).

1.1.3 This working plan has been prepared to reflect the construction and commissioning of a new HDPE polymers recycling facility.

1.2 Site Operation / Licence Holder

1.2.1 The site operates under a bespoke Environmental Permit EPR/LB3001LB. This permit is for the operation and management of a post-consumer waste plastics wash plant and extrusion line for household and commercial DMR material. The permit allows the storage of the raw material prior to processing using debaling equipment, automated IR sorting and manual hand sorting, granulation and washing, and label and coloured flake removal, decontamination of the resulting flake, melt homogenisation, filtration and pelletisation to produce rHPDE Food Grade Pellet and rHDPE Natural Flake.

1.2.2 The operator is Biffa Waste Services Limited (company number **00946107**), whose registered address is:

Coronation Road, Cressex, High Wycombe, United Kingdom, HP12 3TZ.

Telephone: 0800 307307

1.3 Site Location and History

1.3.1 The site is located centrally within the Wilton Industrial estate, a 2,000-acre multi-occupancy manufacturing site located 1.5 miles southwest of Redcar and 7 miles to the east of Middlesbrough. The National Grid Reference (NGR) for the site is NZ 57121 21391.

1.3.2 The site is located adjacent to the existing Biffa Polymers HDPE recycling facility. The existing facility is a permitted waste operation (EPR/JB3406GC), there are some shared facilities between the existing and new process, such as offices and car parking.

1.3.3 Given the location of the site on the Wilton Industrial Estate, primarily the sensitive receptors are Industrial, the closest residential properties, located in Grangetown, are over 1km away from the site.

Sensitive receptors within 1km of the Environmental Permit boundary have been identified and checked using the approved Multi Agency Governmental Information for the Countryside (MAGIC) interactive mapping tool.

MAGIC provides geographic information about the natural environment from across government departments. This information which is available includes those rural, urban, coastal, and marine environments across Great Britain.

The searches confirmed that there are none of the following ecological receptors within 1km of the site's boundary:

- Ramsar's;

- Sites of Special Scientific Interest (SSSI's);
- Special Areas of Conservation;
- Special Protection Area's (SPA);
- Ancient Woodland;
- Local Nature Reserves;
- Areas of Outstanding Natural Beauty;
- National Nature Reserves; and
- National Parks.

The searches confirmed that there are none of the following cultural and heritage receptors within 1km of the site's boundary:

- Listed Buildings;
- World Heritage Sites;
- Scheduled Monuments;
- Registered Battlefields; and
- Registered Park and Garden.

1.4 Permitted Area

1.4.1 The area covered by the Environmental Permit is outlined on the plan attached at Appendix A (Drawing 01 – Environmental Permit Boundary), which cover the whole site. All references to the 'site' in this working plan shall mean these areas and the infrastructure, plant and equipment associated with the site.

1.5 Material Operations

1.5.1 The Environmental Permit allows the acceptance, sorting, treatment (including extrusion) and storage of non-hazardous materials across the whole site. The activities will only be conducted within the permitted area as identified in Appendix A (Drawing 01 – Environmental Permit Boundary) and only in accordance with the specifications defined by the Environmental Permit.

1.5.2 The waste operations carried out on site are detailed below:

- **R3**: Recycling/reclamation of organic substances which are not used as solvents.
- **R4**: Recycling/reclamation of metals and metal compounds.
- **R13**: Storage of material pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).

1.5.3 In addition to this, the following waste installation activities are carried out at the Site are detailed below:

Activity listed in Schedule 1 of the EP Regulations.	Description of specified activity and WFD Annex I and II operations.	Limits of specified activity.
S5.4 A(1)(a)(ii)	Effluent treatment: Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving one or more of the following activities, and excluding activities covered by Council Directive 91/271/EEC concerning urban waste-water treatment (1) – (ii) Physico-chemical treatment D9: Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D12.	From receipt of effluent into effluent treatment plant, to the discharge to sewer.

1.5.4 Treatment consists of dewiring of the baled post-consumer waste HDPE, NIR (Near-InfraRed) sorting and manual hand sorting of the bottles, dry granulation, pre-washing and hot washing of the HDPE flakes, density separation, lights/label separation using air elutriation, flake optical sorting, decontamination using application of temperature and vacuum, extrusion, melt filtration, and pelletisation.

1.6 Permitted Waste Types and Quantities

1.6.1 The material types accepted are listed in the Environmental Permit. They are non-hazardous household, commercial and industrial materials: defined in the Controlled Material (England and Wales) Regulation, 2012 and Section 75 of the Environmental Protection Act 1990. The material is from household, commercial and industrial premises.

1.6.2 The permitted waste list is detailed below:

EWC Code	Description
02	Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing, food preparation and processing
02 01	Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 04	Waste plastics (except packaging)
07	Wastes from organic chemical processes
07 02	Wastes from the MFSU of plastics, synthetic rubber and man-made fibres
07 02 13	Waste plastic
09	Wastes from the photographic industry
09 01	Wastes from the photographic industry
09 01 08	Photographic film and paper free of silver or silver compounds
12	Wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01	Wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01 05	Plastics shavings and turnings
15	Waste packaging; absorbents, wiping cloths, filter materials and protective clothing not otherwise specified
15 01	Packaging (including separately collected municipal packaging waste)
15 01 02	Plastic packaging
15 02	Absorbents, filter materials, wiping cloths and protective clothing

15 02 03	Absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02
16	Wastes not otherwise specified in the list
16 03	Off-specification batches and unused products
16 03 06	Organic wastes other than those mentioned in 16 03 05
17	Construction and Demolition wastes (including excavated soil from contaminated sites)
17 02	Wood, glass, and plastic
17 02 03	Plastic
19	Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 04	Plastic and rubber
20	Municipal waste (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions
20 01	Separately collected fractions (except 15 01)
20 01 39	Plastics

1.6.3 The permitted maximum annual throughput of material is up to 30,000 tonnes.

1.7 Hours of Operation

1.7.1 The site will be operated 24 hours a day, seven days a week.

1.7.2 Core operational hours are:

Receipt of Baled Plastic Material	0600 to 1700 (Monday to Friday only) 0600 to 1700 (Saturdays as required)
Processing of Baled Plastic Material	24-hour operations

1.8 Staffing and Management

1.8.1 The site is open for the receipt of material or for other essential operations, such as planned maintenance and training during the hours listed in section 1.7 above.

1.8.2 The site will only be open for the deposit/receipt of material when the minimum staff requirements are present.

1.8.3 A primary Technical Competent Manager (TCM) for the site oversees site operations and the implementation of the EMS. The primary TCM allocated to the site attends site for a minimum of 20% of the sites operational hours and records their attendance in the site diary.

1.8.4 If the primary TCM is scheduled to be on leave, arrangements will be made in advance to mobilise a subsequent TCM who holds the appropriate certifications to manage the facility to meet the required attendance limit. If the primary TCM is not available to attend due to unforeseen circumstances, there are several subsequent TCM's who hold the appropriate certifications to manage the facility and who can be mobilised to attend site should it be required and may be used collectively as cover. All subsequent TCM's will record their attendance in the site diary.

1.8.5 Roles and responsibilities will be managed by the Site Manager or a nominated representative. Training records for Biffa staff will be held by the respective Biffa management and for contracted staff, by the Contracting Services Company, employed to provide operational staff for the site operations.

1.9 Technical Competence and Training

1.9.1 Technical Competence – the site is managed by sufficient staff who are competent to operate the site in accordance with the permit and without causing pollution. Operations at the site are under the control of technically competent persons who hold the relevant Certificate of Technical Competence (COTC) under the Waste Management Industry Training and Advisory Board (WAMITAB) scheme.

1.9.2 All staff employed at the facility benefit from a training programme, which ensures their professional and technical development.

An assessment of training needs is carried out to identify the posts for which specific environmental awareness training is needed, and the scope and level of such training. The assessment of training needs will be reviewed on an annual basis.

The training programme will ensure that relevant staff are aware of the following:

- Regulatory implications of the EP for the facility and their specific work activity;
- All potential environmental effects from operations under normal and abnormal circumstances;
- The need to report deviations from the EP;
- Prevention of accidental emissions and action to be taken should accidental emissions occur; and
- Records of training needs and training received are maintained

1.10 Health and Safety

1.10.1 All operations onsite will be carried out in accordance with the Biffa Group Integrated Management System (GIMS) which was developed internally, in collaboration with Biffa's Safety, Health and Quality (SHQ) and Environment teams.

1.10.2 GIMS provides a central platform which is available to all staff at any time times, it comprised of; written processes, guidance, forms, and procedures necessary to manage day to day health, safety and environmental risks.

1.11 Management System

1.11.1 Biffa is externally certified to the following standards, registered through NQA:

- ISO 14001 (Environmental Management);
- ISO45001 (Health and Safety Management Standard);
- ISO 9001 (Quality Management); and
- ISO 27001 (Information Security Management).

The above standards form part of the wider Environmental Management System (EMS) that governs operations at this facility. Consequently, operational procedures for the management of the facility will ensure that all appropriate pollution prevention and control techniques are delivered reliably and on an integrated basis. The EMS assists in maintaining compliance with regulatory requirements and managing environmental impacts.

2. SITE INFRASTRUCTURE

2.1 Access and Parking

2.1.1 Access to the site is gained from the A174 via the Kirkleatham roundabout. The Wilton Industrial Estate is only accessible with a security pass issued by the Wilton Visitors Induction Centre.

2.1.2 Parking – There is adequate space in the existing overflow car park located to the north off Plastics Road.

2.2 Notice Board and Signs

2.2.1 The site Notice board is positioned at the site entrance and displays the following information:

- Site Name and address;
- Licence Holders Name;
- Operators Name;
- Environmental Permit number;
- Emergency contact name and telephone number;
- Statement that the site is authorised by the Environment Agency;
- Environment Agency emergency national telephone number 0800 807060 and general enquiries 03708 506 506; and
- Days and hours the site is open to receive waste which information shall be in accordance with the relevant planning permission.

2.2.2 Other site signs include:

- No smoking;
- Speed limits;
- Quarantine area;
- Site traffic instructions; and
- Designated walkways

2.3 Site Security

2.3.1 The site is located centrally within the secure Wilton International industrial estate. The estate benefits from 24-hour manned security gates, and only expected and authorised visitors and deliveries are allowed access on to the site.

2.3.2 The Biffa site is surrounded by gated mesh construction fencing surrounding the access to the yard, preventing unauthorised access to the site.

2.3.3 The entire Wilton International Site has CCTV monitoring which is operated 24/7 and therefore the access roads and entrance area are also considered to have secondary coverage.

2.3.4 During periods of planned plant shutdown (Christmas break) additional external security patrols can be requested by the site security firm Falck.

2.4 Site Office

2.4.1 The Site Office is located within the main office block located within the permit boundary of the existing Biffa Polymers HDPE recycling facility.

2.4.2 The site records are maintained and kept within the site office or in electronic format and are available for inspection if required. The list below details the relevant site documents which will be kept for at least 6 years.

- Environmental Permit and supporting application details;
- Working Plan;
- Site Diary;
- EA Compliance Assessment Reports (CARs);
- In-house daily and weekly inspection sheets;
- Duty of Care Transfer Notes (at least 2 years);
- Consignment Notes (at least 3 years);
- Hazardous material logs;

- Material delivery tickets;
- Weighbridge tickets;
- Visitor Book;
- Accident Book;
- Staff competency / training records; and
- Permit to work system.

2.4.3 The following documents will be kept until the Environmental Permit is surrendered:

- Records associated with any off-site pollution incident where effects are alleged to have caused environmental harm or human health effects;
- Design, construction and maintenance records; and
- Details of any non-conformance including spillages and incidents.

2.5 Weighbridge

2.5.1 Two weighbridges are located on the external east side of the process building to measure the vehicles incoming material loads.

2.5.2 All weighbridges are connected to Integrated Material Systems (IWS) material management software to ensure all waste is recorded and can be audited accordingly.

2.5.3 A computerised weighbridge ticket is produced, and the driver is given the top copy. The weighbridge ticket includes the following:

- Facility address.
- Date and time.
- Gross weight.
- Tare weight.
- Net weight.
- Registration.
- Material stream; and
- Signatures from both the weighbridge attendant and the vehicle driver.

2.5.4 The weighbridge is always manned during operational hours when waste is received to site, as detailed in section 1.7.2 above.

2.5.5 The weighbridge is calibrated annually, with the calibration certificate retained within the site office for reference.

2.6 Fuel and Chemical Storage

2.6.1 The bulk LPG tank for refuelling of Forklift gas cylinders is located in the external yard area. The tank is not designed to have containment of 110% of the volume of the tank due to the nature of LPG, instead the tank is situated with a 3m safety clearance of 3m meaning any liquid will vaporise within that distance. Also, the tank has a pressure release valve on top which vents gas to the atmosphere if the pressure is too high.

2.6.2 Any liquid fuels or chemicals stored on site will be in mobile storage containers or steel drums. Liquid / chemical containers will be double skinned, stored within bunded areas or on drip trays. The location may vary depending on operational need. Gas bottles will be utilised on site, but stored in secure gas bottle storage cages on the existing Biffa Polymers HDPE recycling facility.

2.6.3 The full controls of refuelling activities are covered in a DSEAR Risk Assessment.

2.7 Drainage

2.7.1 All material handling, processing buildings and storage will be conducted on impermeable surfaces with sealed drainage systems.

2.7.2 The site drainage plan, Appendix C (Drawing C-1000 – Proposed Drainage Plan), details the entire drainage system for the site and should be used to identify specific drainage asset locations in the event of an incident.

2.7.3 Clearing and cleansing of the drainage system will be monitored and initiated as required to prevent any build up from occurring.

2.7.4 All site drainage is directed to Sembcorp Utilities UK's drainage network within the Wilton International site, under an agreement which details the quality of the trade effluent which Biffa can discharge into the on-site drainage network. Sembcorp Utilities UK Limited hold an environmental permit for the regulated discharge of trade effluent from the Wilton International Site.

2.8 Vehicles, Plant and Equipment

2.8.1 All plant and vehicles employed on the site are regularly serviced by our in-house engineering Team and specialist contactors, to ensure that they are in first class order and in compliance with relevant legislation, such as the Provision and Use of Work Equipment Regulations (PUWER) 1998 and Lifting Operations and Lifting Equipment Regulations (LOLER) 1998.

2.8.2 Site plant operatives carry out daily plant maintenance checks on all plant including forklifts, and MEWPs. Any issues detected during the inspection of vehicles will result in the equipment being labelled as 'defect' and suitable assessment and repairs organised. The inspections are recorded on the Group Integrated Management System template GF06-06 (Daily Mobile Plant Checks).

2.8.3 All plant inspection and examination certificates are electronically stored which indicate when re-inspections are required to ensure no plant is in operation without a valid certificate.

2.8.4 Site managers and the Safety Manager will regularly inspect plant to ensure that operational safety systems are working correctly.

3. SITE OPERATIONS

3.1 Material Transfer, Treatment and Storage

3.1.1 All material recycling operations will take place within the processing building. Incoming post-consumer waste HDPE bales will be stored within bunkers that are separated out by fire walls, locations of the bunkers are detailed at Appendix B (Drawing 02 – Site Layout Plan). Each bunker is 8mx7mx3.2m which can store up to 179m^3 of plastic bales, since each bale has an average dimension of 1.3m^3, this volume will be made up of up to 137 plastic bales.

3.1.2 The table below details the waste storage arrangements, volumes, and storage times for each waste type.

Waste Type	How is it stored?	Bay Dimensions (L x W x H)	Maximum Storage Time	Maximum Volumes Stored (m^3)
HDPE bottle	Bales stacked within external bay	7 x 8 x 3.2	4 weeks	179
HDPE Jazz bottle	Bales stacked within external bay	7 x 8 x 3.2	4 weeks	179
HDPE Non-Food Natural bottle	Bales stacked within external bay	7 x 8 x 3.2	4 weeks	179

3.1.3 Only waste that meets the criteria of the incoming inspection check and the Waste Acceptance Procedure will be accepted and unloaded. The Polymers facility stores the baled post-consumer waste HDPE sourced primarily from Biffa MRFs and PRFs, but also third-party sources. This material is recycled through the ARF (Advanced Recycling Facility) line washing and sorting plant, converting it into cleaned washed HDPE Natural flake, which is then converted to a food grade pellet using a Vacurema extruder.

3.1.4 Waste material is transferred from the external storage bays into the building, and temporarily stored in an allocated area detailed at Appendix B (Drawing 02 – Site Layout Plan), as required to ensure there is a constant feedstock buffer available for processing. This enables good stock rotation to be implemented because the first in, first out principle is applied to the material which is brought into the building for processing from the external storage areas.

3.1.5 Material which meets the end of waste criteria and is deemed product is stored within the processing building in the following ways:

- 6 x 25 tonne cloth silos – storage of HPDE Food Grade Pellet
- 22 x 1 tonne octabins - storage of HPDE Food Grade Pellet
- 15 tonne steel silo – storage of HPDE Natural Flake
- 100 x 1 tonne canvas bags – storage of HDPE Natural Flake

3.1.6 All designated storage areas, both internal and external have impermeable surfacing and sealed drainage.

3.2 Stock Rotation

3.2.1 As the waste is stored in bays the first in, first out principle is implemented to ensure full and frequent stock rotation is applied. A waste tracking system is operated which allocates a Sales Order (SO) number to each load. When a load is accepted and directed to the correct unloading area in the yard, the SO number is added to the raw materials spreadsheet, allowing the location of the material to be identified. This will be duplicated on a whiteboard showing the bale storage stack/bay locations. When a load is brough into the waste processing building to be processed, the whiteboard and raw materials spreadsheet is updated. The material in the Polymers bale storage area will typically be rotated every 5 days on a first in, first out basis.

3.3 Pre-Acceptance

3.3.1. Guidance is given by the site management to all employees, subcontractors, other material carriers and customers regarding material types that are acceptable at the site. The material arriving on site is predominantly delivered using Biffa vehicles or contracted hauliers who hold current waste carrier's registration certificates. Details are taken for all new haulage operations bringing material to site and the details are periodically checked with the EA to ensure registration.

3.3.2 Biffa Staff will obtain details of the nature of the waste and description (including EWC code). The EWC code will be checked against the EWC codes included in the Environmental Permit to determine if the waste type is permitted at the Site. The site will only accept the waste types detailed in the Environmental Permit (EP) EPR/LB3001LB.

3.3.3 Waste acceptance at the site is controlled via waste transfer notes. Regardless of whether wastes are brought to the site by Biffa collections or third-party collections, Duty of Care requirements are still met, and Biffa will only set up contracts with customers (both internal and external/third party) having been able to assess whether the waste is likely to be suitable for receipt under the Permit conditions, having been provided with a sufficient degree of information on the type of waste to be accepted.

3.4 Receipt of Loads – Waste Acceptance

3.4.1 Once pre-acceptance checks are completed and the waste has been initially approved for disposal at site in accordance with the Waste Acceptance Flow Chart (Appendix E - Procedure for Waste Acceptance v1.2_HDPE3), the waste is collected or brought to site for transfer.

The following loads are not accepted on site:

- Hot loads
- Odorous loads
- Dusty loads
- Non-conforming loads
- Loads which are infested with flies

3.4.2 All incoming vehicles are required to drive onto the relevant inbound weighbridge where the weighbridge attendant will enter the vehicle registration and the details of the material that the vehicle is carrying onto the system. the duty of care documentation is checked to make sure that all relevant information has been completed:

- Producer/Transferee details
- Waste description information
- Transferor details
- Carrier Details
- Transferee details
- Dates/signatures

3.4.3 The vehicle is then directed to the relevant tipping area for the particular material stream. The vehicle then travels along the designated route to the tipping facilities, observing the on-site 10 mph speed limit. This route is kept clear at all times to ensure an efficient turnaround on site.

3.4.4 Once unloaded the vehicle accesses the outgoing weighbridge and a new reading taken. Weighbridge tickets will be issued to drivers once both readings have been taken.

3.5 Checking Loads and Non-Conforming Waste

3.5.1 If material does not meet the description stated on the material transfer note the customer will be advised to check the note and give a more detailed description of the material. If the more detailed description of the material reveals that the material is not permitted, then the load will be rejected.

3.5.2 If waste is found to be non-conforming once unloaded, the load will be reloaded, the issue will be recorded in the site diary and the customer will be informed. It is likely that the driver will be asked to remove it from site and transport it to another permitted facility. If the load cannot be re-loaded, it will be transferred by a clamp or forklift truck to the non-conforming waste quarantine area, following the Quarantine procedure.

3.5.3 If an incidental amount of non-conforming waste is found within a conforming load, it will be removed and transferred to the non-conforming quarantine area, where it will remain segregated until scheduled removal to an approved facility.

3.6 Material Collection (Outgoing Material)

3.6.1 When a collection vehicle arrives on site the driver is instructed to report to the site office where all relevant documentation is completed, and the vehicle is passed to load the material.

3.6.2 The driver accesses the incoming weighbridge, and a reading of the total weight is taken. The driver is then directed to the correct area in preparation for loading. During loading visual inspections of the waste are undertaken to prevent the possibility of any hot loads being transported. After loading is

complete the vehicle makes its way to the outward weighbridge for further duty of care documentation checks and weight recording, the waste is then transported to an onward treatment or disposal site. Weighbridge tickets will be issued to drivers once both readings have been taken.

3.6.3 All material disposal outlets are checked for suitability prior to arriving at site, to ensure they are permitted to receive the waste stream and are compliant with any permissions which they hold.

3.7 Contingency Plan

3.7.1 If the maximum storage capacity of the site is reached, then no further waste is tipped until waste can be removed from the site and taken to a suitably licenced or exempt waste management operation.

3.7.2 If the site is not able to operate under normal conditions due to unforeseen events such as;

- Plant breakdowns,
- Environmental incidents
- Logistical issues

The site contingency plan will be initiated. The Contingency Plan is a separate document, located in the site office within the Contingency folder.

A summary of possible contingency options is detailed below:

- Reschedule delivery times/days for inbound waste.
- Increase the number of outbound movements of waste.
- Divert scheduled waste deliveries to other internal sites or third-party sites.
- Cease all waste activities.
- Reduce waste activities.
- Limit waste volumes.

4. ENVIRONMENTAL CONTROL, MONITORING AND REPORTING

4.1 Breakdown and Spillages

4.1.1 In the event of breakdown of any mobile plant alternative mobile plant will be brought on site until it is repaired unless the repair can be carried out quickly without causing the operations of the site to breach any EP conditions.

4.1.2 The surface of the external material storage bays will be cleared of all material at least once every 7 days to allow for cleaning, sweeping, inspection of the site surface, and to carry out any necessary repairs.

4.1.3 The site has 2 chemical spill kits, and 2 oil spill kits which are readily available should they be required. The locations of the spill kits are detailed on drawing Appendix D (Drawing 03 – Fire Prevention Plan). Any spillages will be cleared immediately by depositing absorbents on the affected area. The absorbents will then be placed in a suitable container in the Hazardous Materials Storage and Quarantine Area, prior to being taken to a suitably licenced site for disposal.

4.1.4 Any breakdown of plant that could lead to a breach of EP conditions and any spillage will be reported to the EA as soon as is practically possible.

4.2 Site Inspections and Maintenance

4.2.1 Site inspections and Maintenance are conducted as per frequencies defined in the Group Integrated Management System (GIMS) and will be conducted by a Shift Production Manager or a person who is familiar with the requirements of the working plan and EP for the site, i.e. Site Supervisor. All details of defects, problems and repairs carried out will be recorded on the form on the day that each event

occurs. Detailed comments may also be recorded in the site diary. All repairs of defects that pose a risk to the environment will be carried out as soon as practicably possible.

4.2.2 All repairs to site security fencing will be made within 5 working days of the discovery of the damage and the site will be made secure until the repair has been affected.

4.2.3 Any major defects found during the daily site inspection which are likely to lead to a breach of permit conditions will be repaired by the end of the working day in which they are found where possible. If a repair is not possible by the end of the working day the Environment Agency will be contacted to agree a suitable timescale for repair.

4.3 Housekeeping

4.3.1 Regular housekeeping is undertaken and is recorded within the Daily Site Check list.

Housekeeping consists of:

- Daily yard sweep and litter picking within the site
- Weekly bunker clean

The surface of the internal transfer bays will be cleared of all waste at least once a week, to allow for a detailed inspection of the surfaces and infrastructure. During this time, any required repairs will be carried out.

5. AMENITY CONTROL

5.1 Control of Mud and Debris

5.1.1 Mud on roads - The surfacing of the entire operational area of the site is concrete hard standing. The strict use of the dust control measures listed in Section 5.2.3 significantly reduces the risk of mud deposition on the approach roads. As the site is located centrally within the Wilton International industrial estate the potential for deposition of mud onto roads is negligible.

5.1.2 Road vehicles will not track through areas where material is stored.

5.2 Control and Monitoring of Dust

5.2.1 All site operations will be carried out to minimise the creation of dust. Due to the nature of the operations, it is unlikely waste loads will give rise to dust at a level which would require further measures to be adopted. The process itself consists of wet areas (washing section) that ensures that any dust on the material is washed off into the effluent treatment system.

5.2.2 The process for storing material and the quantity stored will ensure that the potential of dust related issues are minimised.

5.2.3 The following measures are implemented to avoid dust:

(i) Concrete hard standings act as a manageable surface for vehicular traffic and reduce the generation of dust on the site it will also prevent any potential run off of sediment;
(ii) Site managers also carry out TPM monitoring of sites.

5.3 Litter Control

5.3.1 The site is inspected daily when the site is in operation and debris will be swept as required.

5.3.2 Any litter which does escape and is captured by the site fence will be removed before the end of the working day that it is discovered.

5.3.3 Sheeting of vehicles – all vehicles carrying loads off site will be securely sheeted before leaving the site.

5.3.4 The following measures are implemented to minimise litter:

- Materials will be baled and/or stored in designated secure bays which will contain the material to reduce any potential wind disturbance causing litter/pollution.
- All wagons/trailer units and skips leaving site will at all times be appropriately sealed/sheeted to prevent escape of dusts/materials.
- Regular housekeeping is carried out by operatives, including the picking of any stray litter which may have escaped during high winds.

5.4 Control of Pests, Birds and Scavengers

5.4.1 Rat Control - rat control on site is controlled in the first instance by good housekeeping measures, such as regular material rotation, segregation of stored bales and complete clearing of bays during periods allocated for cleaning.

5.4.2 In addition, poison bait boxes are supplied and maintained by a professional environmental pest control contractor. These boxes are located throughout the site. The boxes are replenished monthly and any rat corpses are removed for hygienic disposal.

5.4.3 The location of the rat bait boxes is recorded by the pest control contractor. These bait boxes have been placed around the site to cover the site entrance, canteen facilities, main office block, and access points to the Process Facility.

5.4.4 Bird Control – To mitigate nuisance, good house-keeping practices will be adopted.

- If required a suitable pest control contractor will be appointed to control scavenging bird populations. These include but are not limited to the use of bird scaring acoustic devices and bird kites mimicking birds of prey as a deterrent.
- The appointed pest contractor may also employ additional controls, if deemed necessary, which may include utilising trained falcons and hawks to deter birds and gulls from scavenging during operational hours.

5.4.5 The site will be inspected regularly as part of the daily/weekly site inspection and the presence of any pests noted in the site diary by the shift manager or competent person.

5.5 Control and Monitoring of Noises and Vibration

5.5.1 It is impossible to remove all noise from the operation of the material site, but everything possible is done to keep noise to an absolute minimum. The following noise control principles are implemented:

- All machinery and plant complies with the relevant noise limits;
- For any particular job, the quietest plant and/or machinery is used;
- The extrusion line is segregated from the washing plant which helps to reduce and control noise;
- All equipment on site is maintained in good mechanical order and serviced in accordance with manufacturer's instructions and fitted with the appropriate silencers, mufflers or acoustic covers, where reasonably practicable;
- Stationary noise sources (generators or similar) are sited as far as possible from noise sensitive neighboring properties, and where necessary, acoustic barriers are used to shield them;
- The movement of vehicles to and from the site is controlled and 10mph speed limits imposed;
- Employees are supervised to ensure compliance with the noise control measures adopted;
- Broadband reverse alarms are used to reduce the travelling distance of noise from vehicles;

- The plant has a granulator, shredder, conveyors, a washing system, air and density separation, optical sorting multiple extrusion lines all powered by electric motors, and the recyclable material is loaded and moved on site by small LPG powered Forklift trucks, to reduce excessive noise produced by the process of recycling the baled material; and
- If any changes to the Polymers recycling process are made, then an independent audit would be carried out to ensure that acoustics are kept to a safe acceptable level.

5.5.2 The site Complaints Procedure, outlined in section 6.2 below, will be followed for all noise complaints.

5.6 Odour Control

5.6.1 All incoming material is subject to the acceptance procedures outlined in Section 3.4 above. If any material exhibiting offensive odours is deposited on site it will be deposited in the quarantine area or removed from site immediately to a suitable disposal site.

5.6.2 Standard operational techniques employed to control odour are:

- Good housekeeping measures, such as regular material rotation and complete clearing of bays;

5.6.3 Excessive odours are not usually a problem. Odours can be mitigated using good operational techniques. Should odour become an issue then the following action will be taken:

- Investigate the source of the odour;
- Investigate operations management;
- Investigate other potential sources exterior to the site; and
- Investigate complaint.

5.6.4 If offensive odours are detected within the site or external complaints are received, then further action will be taken to improve site operations. If this is not sufficient then alternative control methods will be employed such as odour masking sprays.

5.7 Control of Fire

A. 5.7.1 Refer to the Fire Prevention Plan (Appendix F - Redcar HDPE3 Fire Prevention Plan) for comprehensive details of measures for the prevention of fire from site operations. Waste on site is stored in manageable and permitted volumes, taking into consideration the Fire Prevention Guidance and limits.

5.7.2 Waste storage times are low with maximum storage times of combustible waste being adhered to during normal operations. Active management of stockpiles (stock rotation) reduces the possibility of heat being generated.

5.7.3 Smoking is only permitted within the designated smoking area, which is away from the operational area.

5.7.4 There are no fires allowed on site.

5.7.5 Sufficient firefighting equipment is kept on site, checked, and maintained to a serviceable condition.

5.7.6 Any fire at the site is regarded as an emergency and immediate action is taken to extinguish it with the appropriate fire extinguisher, provided that the person feels competent to tackle the fire.

5.7.7 In the event that the fire cannot be tackled with the equipment provided the Fire Service should be called and the fire hydrants shall be utilised.

5.7.8 Any flammable gases used in flame cutting equipment are subject to procedures within the Group Integrated Management System (GIMS).

5.7.9 Only trained personnel are allowed to undertake burning operations under strict supervision and under the control of a Hot Work Permit, or in a designated hot works area.

5.7.10 Specific risk assessments will be detailed for burning operations.

5.7.11 All flammable gas imported for the works are utilised in designated areas.

5.7.12 Suitably trained Fire Marshals are responsible for assisting with the evacuation of staff from site in the event of an emergency.

5.7.13 An Emergency Procedure is in place which is initiated in the event of a fire and details what actions need to be taken. These actions include:

- Safe evacuation of all stall -roll call
- Contact Falck Fire Services UK (Wilton International Estate benefits from an on-site rapid-response emergency services)
- Contact the Environment Agency
- Contact the Local Authority
- Supply Falck Fire Services with relevant documents located in the Gerda box, including fire risk assessment, drainage plan, waste types and volumes on site, site plan.

5.7.14 A Tactical Information Plan (TIP) is supplied to Falck Fire Services UK on an annual basis, to allow preparation for emergency response in advance.

6. REPORTING

6.1 EA Reporting Mechanism

6.1.1 Any incidents involving the following where there is an immediate threat to the environment will be reported to the EA as soon as is practicably possible either through a direct line to the Newcastle office or using the national 48-hour line where out of normal office hours;

- Accidents;
- Significant Incidents;
- Plant breakdowns and malfunction that could have an adverse effect on the environment or human health and could lead to a breach of EP conditions; or
- Any significant environmental effects including damage to any sensitive receptors and significant impacts on properties.

6.2 Environmental Management System

6.2.1 Biffa Waste Services operates an Environmental System in line with the requirements of the Environmental Permitting Regulations 2016.

6.2.2 This Environmental Working Plan will be reviewed and updated on an annual basis, or because of any of the following activities:

- The issue of an Environmental Permit variation by the Environment Agency;
- A material change to the operational process;
- A substantiated complaint; or
- Any changes in legislation or guidance documents applicable to the Redcar Plastics Recycling Facility.

6.3 Site Records

6.3.1 The following records are maintained and stored within the site office:

- Environmental Permit
- Site Diary
- Daily Check Sheets
- Waste Transfer Notes (WTNs) required to be kept for two years
- Consignment Notes (CNs) required to be kept for three years

6.3.2 A site diary shall be kept secure and shall be available for inspection at the site when required by an authorised officer of the Environment Agency. This shall include a record of the following events:

- Construction work;
- Maintenance;
- Breakdowns;
- Emergencies;
- Problems with material received and action taken;
- Site inspections and consequent actions out by the operator;
- Technically competent management attendance on site, the date and the time onto site and left site;
- Despatch of records to the agency;
- Severe weather conditions;
- Complaints about site operations and actions taken;
- Environmental problems and remedial actions; and
- Any other issues of note.

6.3.3 Visitors to the site will sign the visitor's book upon arrival and exit stating the purpose of their visit and the organisation they represent and will carry out a site induction

6.4 Complaints Procedure

6.4.1 All complaints received will be recorded in the Site Complaints Register.

6.4.2 Following the receipt of a complaint, Biffa would contact the complainant to provide feedback on actions taken to both assess the event and convey remedial actions.

6.4.3 If a complaint is received by Biffa, an investigation will be instigated to identify the cause of the complaint. Such an investigation will involve the identification of activities considered to be the cause of the complaint and/or the investigation of mitigation measures to remediate the issue.

6.4.4 All findings will be recorded in the Site Complaints Register, and the complainant would be updated in response to their original complaint.