Public

Cumbria Waste Recycling Ltd
Seal Sands HWTS Environmental Permit Application

Pest Management Plan

2026-04-27

UK0042157.9205 / Appendix 11

Document distribution

Cumbria Waste Recycling

Seal Sands HWTS Environmental Permit Application

Pest Management Plan

2026-04-27

UK0042157.9205 / Appendix 11

Prepared for

Cumbria Waste Recycling Ltd

Seal Sands Hazardous Waste Transfer Station, Seal Sands Road, Seal Sands, Middlesborough, TS2 1UB

Submitted to

Environment Agency

Prepared by

WSP UK Ltd
2 London Square, Cross Lanes, Guildford, Surrey, GU1 1UN
T 01483 528953

Quality control	Name	Date	Signature
Prepared by:	Stephanie Platzer	27/4/2026	Stephanie.Platzer@wsp.com Digitally signed by Stephanie.Platzer@wsp.com DN: cn=Stephanie.Platzer@wsp.com Reason: I am the author of this document Date: 2026.04.29 11:20:25 +01'00'
Reviewed by:	James Killick	27/4/2026	James.Killick1@wsp.com Digitally signed by James.Killick1@wsp.com DN: cn=James.Killick1@wsp.com Reason: I have reviewed this document Date: 2026.04.29 11:21:39 +01'00'
Approved by:	Matt Derbyshire	27/4/2026	Matthew.Derbyshire@wsp.com Digitally signed by Matthew.Derbyshire@wsp.com DN: cn=Matthew.Derbyshire@wsp.com Date: 2026.04.29 13:47:20 +01'00'

Revisions

Rev	Date	Details
01	2026-04-27	For Issue

Table of contents

Executive summary

This Pest Management Plan has been prepared as part of the Environmental Permit Application for Seal Sands Hazardous Waste Transfer Station (HWTS). This forms part of the Environmental Management System (EMS) at the Site and to assist in the overall environmental performance of the Site.

This Pest Management Plan identifies the sources of potential pests that could be generated by the activities at the installation, and how, as far as is reasonably practicable, they are minimized, controlled and recorded by mitigation measures. The Site activities are not considered to attract significant pest activity; however, controls are still required to prevent pests from causing an impact at offsite locations.

This document and its associated sections will only be disclosed to those of the recipient's employees and contractors who have a need to see it as part of their duties.

This is a controlled document. Once printed, it is considered uncontrolled and may not reflect the most current version. Please refer to the electronic version for the latest updates

This Pest Management Plan is subject to regular review as a result of operational changes, changes in the types of waste accepted and treated at the Site, after an audit recommendation and as result of any substantiated pest complaint received by the Site or notified by the Environment Agency. As a minimum, this Pest Management Plan will be reviewed every two years and the date of the next review is **April 2028**.

1. Pest Management Plan

1.1 Site details

Site name: Seal Sands Hazardous Waste Transfer Station

Site address:

Cumbria Waste Recycling Ltd
Seal Sands Hazardous Waste Transfer Station
Seal Sands Road
Seal Sands
Middlesbrough
TS2 1UB

Operator name: Cumbria Waste Recycling Ltd

Permit number: EPR/YP3424LH/A001

1.2 Who this plan is for

1.2.1 Who should be made aware of this plan?

- Site Operators
- Site Staff
- Contractors
- The Environment Agency

1.2.2 How will they be made aware?

This Pest Management Plan (PMP) will be delivered to all relevant site personnel and approved contractors working at Seal Sands Hazardous Waste Transfer Station **(**HWTS). Relevant personnel will be required to read through this plan and become familiar with the contents and controls with respect to pests.

Pests are in reference to insects (such as flies), vermin and birds which could cause infestations and nuisance to the Site and / or surrounding area.

A copy of this PMP will always be available to all staff on the Site Noticeboard, a copy kept in the Transfer Station Manager's Office and an electronic version is available on the Cumbria Waste Recycling (CWR) intranet so that the latest version is always available to all staff.

All site operatives will be trained on the contents of this PMP to allow the Site staff to implement an action plan should the Site operatives detect a pest incident, receive complaints from local business or residents and if the Environment Agency (EA) suspects a pest issue at the Site during an inspection.

2. Introduction

This PMP has been prepared by WSP UK Ltd on behalf of Cumbria Waste Recycling Ltd (the Operator).

This PMP assesses the risk of pests associated with the storage and treatment of waste at the Seal Sands HWTS, Seal Sands, Middlesbrough, TS2 1UB and provides mitigation and control measures implemented in relation to minimising incidents due to pests from waste operations undertaken at the Site. Where incidents with pests do occur, measures within this PMP will be undertaken to reduce the impact on receptors and prevent the pest incident re-occurring.

This PMP has been produced in accordance with the following guidance:

- Environment Agency's guidance: Develop a management system: environmental permits (updated April 2023).
- Control and monitor emissions for your environmental permit (https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#pest-management-plan)

In addition to this PMP, the Site will be operated in accordance with a comprehensive Environmental Management System (EMS).

2.1 Site description

Seal Sands HWTS is a transfer station for both hazardous and non-hazardous solid and liquid waste with associated waste handling, storage, treatment and removal from site. Waste is removed from the Site for further treatment or disposal at offsite locations. Waste treatments include:

- Physico-chemical treatment of liquid waste via gravity separation, adsorption and dissolving/neutralising;
- Blending and mixing of liquid wastes;
- Repackaging of solid wastes;
- Crushing and baling of solid wastes to make onwards transfer more efficient; and
- Manual sorting of batteries

Although the likelihood of pest incidents is considered to be low due to existing mitigations that are inherent to the waste types handled, due to the variety of waste types to be handled there remains the potential for pests to be attracted to the Site.

2.2 Site Location

The Site is located at Seal Sands industrial estate, Teesside, an industrial estate which has historically been used by the chemical industry and waste management industry, situated on the mouth of the River Tees.

The Site comprises of two areas, both of which are enclosed by a perimeter fence with access control:

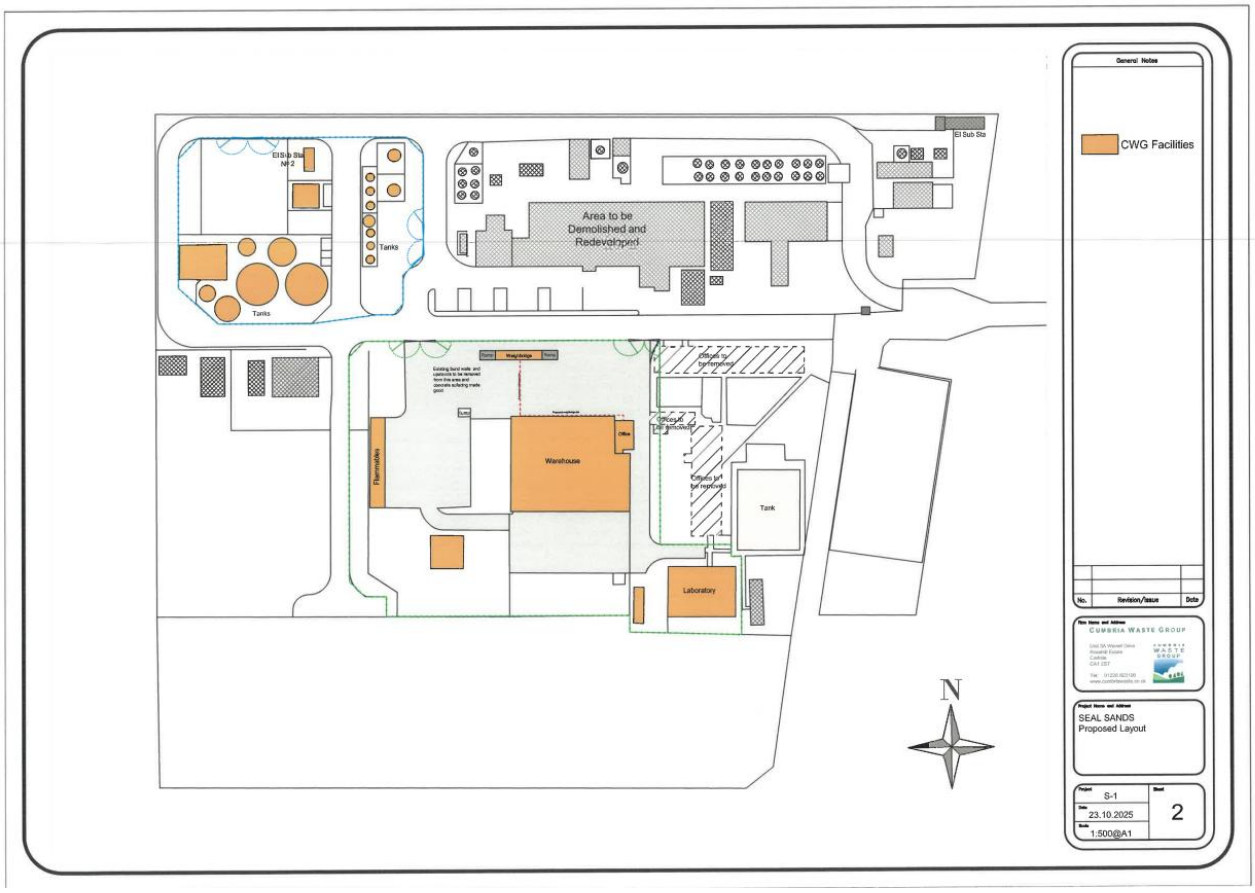
- Area 1 (in the south) consists of gated access for waste deliveries and the site weighbridge. The main Warehouse for the internal storage of waste, a small warehouse for secure internal storage of waste, external yards for additional waste storage, site Laboratory and site Office are also found in this location. The main Warehouse will store a variety of compatible wastes with the exception of flammable wastes while the small warehouse will be used to safely and securely store smaller volumes of organic peroxides and oxidisers. Bulking and repacking operations will take place in the site Workshop on the eastern side of the main Warehouse. The yard area comprises impermeable concrete surfacing which is resistant to the materials stored here and connected to a sealed drainage system. Kerbing around the impermeable surfacing forms a containment area beyond which the land is unmade.

  The yard area within the western area of the Site will be used for exclusive storage of flammable waste (including undercover storage). The second yard area to the south of the main Warehouse will store a variety of compatible wastes.

- Area 2 (in the north) consists of a yard area and a number of above ground tanks which are connected by above ground pipework. The yard area comprises impermeable concrete surfacing which is resistant to the materials stored here and connected to a sealed drainage system with a sump, that can be used to pump out waste waters generated here. The yard is an engineered bunded area with kerbing which forms a containment area and beyond the bunded area is unmade ground. A variety of compatible wastes will be stored within the yard area.
  Of the aboveground tanks in Area 2, one of the tanks is used as a mixing tank for waste waters generated at the Site and one of the tanks is used as an effluent discharge tank, for discharging waste waters to sewer. Both tanks are contained within a bunded concrete area. This discharge is via a private sewer connection.

A site plan for Seal Sands is shown in Figure 2.1 below.

Figure 2.1 Site Plan



2.3 Hours of Operation

The Site will operate for up to seven days per week in order to manage waste throughputs, including at weekends as required.

Deliveries will normally take place between 6am and 6pm. The Site will not normally undertake nighttime work.

2.4 Maintenance and review of the PMP

The Transfer Station Manager has responsibility for the day-to-day operations of the Seal Sands HWTS and is responsible for confirming all site personnel are suitably trained and competent to perform their roles including compliance with this PMP.

All staff undertake a comprehensive site induction when beginning work at Seal Sands and staff undertaking waste treatment activities are qualified as a minimum with a Higher National Certificate (HNC) in chemistry or equivalent. The Transfer Station Manager is supported by key personnel listed in Appendix A.

A copy of this PMP will always be available to all staff on the site Noticeboard, a copy kept in the Transfer Station Manager's Office and an electronic version is available on the Cumbria Waste Recycling (CWR) intranet so that the latest version is always available to all staff.

The Transfer Station Manager in conjunction with the Environment Manager is responsible for reviewing and updating this PMP. The PMP will be reviewed bi-annually and will be due for review two years from the date of approval, or, as a result of any incidents which may lead to the requirement for immediate review. The circumstances which would warrant a review are the following:

- Operational changes at the Site:
    - Changes to activities at the Site resulting in a new treatment activity; or
    - Additional waste streams accepted on site; or
    - Increased waste volumes accepted and stored.
- Development of site infrastructure;
- Experiencing a substantiated pest related incident
- As a result of a request from the Environment Agency to update this plan.

This PMP will also be reviewed as a result of significant change to relevant industry guidance or legislation.

2.5 Staff training

Staff on site will receive appropriate training to ensure that the prevention and control techniques within the PMP can be successfully implemented on site. This will include training such as identifying different types of potential pests around the Site (such as fly's, birds and vermin) and waste rejection procedures in the event of an incident with pests as waste is accepted. This training will be repeated periodically and after a significant pest incident (if one was to occur).

All Site Staff operating at the Site, under supervision from the Supervisor Operator, are responsible for adhering to CWR Working Instructions (WI) and working safely at all times. Records of training and competence are made on individual training records, which are stored electronically.

2.6 Relevant sector guidance on which this OMP is based

This PMP has been produced to align with the contents from the Environment Agency 'Pest Management Plan Template' (version 2) and in accordance with the following guidance:

a) Environment Agency's guidance: Develop a management system: environmental permits (updated April 2023).

3. Receptors

3.1 Receptor List

The Site is located at Seal Sands industrial estate, Teesside, an industrial estate which has historically been used by the chemical industry and waste management industry, situated on the mouth of the River Tees. There are no sensitive residential receptors located at the industrial estate and the closest receptor is the ConocoPhillips Teesside terminal, which is located on the northern boundary of the Seal Sands HWTS and separated by two internal haul roads at a distance of approximately 20 metres. A chemical plant, Intertek, can be found 0.22 km to the East of the Site. The nearest sensitive human receptors are found approximately 3.8 km to the south-west of the Site.

Figure 3.1 below shows the location of Seal Sands HWTS and a 1 km radius of the Site.

Table 3.1 Receptor list

Receptor reference	Land use e.g. house, school, hospital, commercial	Direction from site	Approximate distance to site boundary (m)	Sensitivity to pests
A	Teesmouth and Cleveland Coast Ramsar site	N	430	Low
B	Teesmouth and Cleveland Coast Site of Special Scientific Interest (SSSI)	N	430	Low
C	Teesmouth National Nature Reserve (NNR)	NW	640	Low
D	Conoco Philips	N	20	High – clean industry receptor
E	Greenergy Biofuels Teeside Ltd	S	70	Medium – clean industry receptor
F	Fine Environmental Services and Fine Organics Ltd	SW	15	High – clean industry receptor
G	Intertek	E	225	Medium – clean industry receptor
H	Lianhetech Seal Sands	SW	65	High – clean industry receptor
I	Exolum Seal Sands Ltd	NE	75	High – clean industry receptor

Figure 3.1 Receptors within 1 km of the Site

3.1.1 List of nearest residential receptors

The Site is located away from sensitive residential receptors, the nearest of which are found approximately 3.8 km to the south-west of the Site, beyond the River Tees on the A65/Middlesborough Road, in the South Bank area of Middlesborough. Residential receptors can also be found 4.2 km to the north of the Site, in Seaton Carew.

Human receptors may also be found at nearby recreational facilities including the footpaths, car parks and hides associated with Teesmouth NNR , approximately 2 km west of the permit boundary, North Gare Beach and South Gare Marine Club (both approximately 3 km to north-east), either side of the mouth of the River Tees.

Table 3.2 Human Receptors List

Land use e.g. house, school, hospital, commercial	Direction from site	Approximate distance to site boundary (m)	Sensitivity to pests
Houses on Normanby Road/South Bank	SW	3,800	High
Houses on De Haviland Way/Seaton Care	N	4,200	High
St Peter's Catholic College	S	4,400	High
Grangetown Primary School	S	4,500	High
The Eston Surgery (Low Grange Health Village)	S	4,700	High
Dormanston Primary Academy School	E	4,750	High
Seymour House Nursing Home	N	4,800	High
High Clarence Primary School	SW	4,900	High
Greatham C of E Primary School	NW	4,900	High
Eston Lodge Care Home	S	4,900	High
High Clarance Primary School	SW	5,000	High
Redcar Primary Care Hospital	E	6,650	High

Although the human receptors are considered to be highly sensitive to pests, the distance from the Site means that there is a very limited pathway for pests to impact upon them. Due to the distance and dispersion effects of wind, which lowers the potential for pest impacts, that reduces with a greater distance from

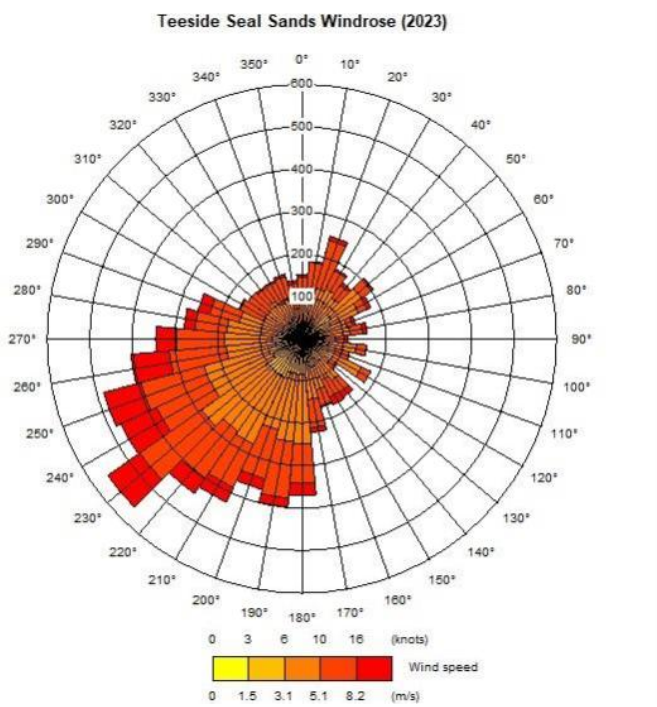
the source, it is not expected that the HWTS will have a pest impact on sensitive human receptors, and the source-pathway-receptor model is therefore impeded and broken.

3.2 Wind rose and source of weather data

Figure 3.2 below is a representative wind rose for Seal Sands for 2023. It is based on national weather prediction modelling and shows that the prevailing wind is normally from the south-westerly direction, and the wind speed is typically between 3.1 and 8.1 metres per second (6 -16 knots).

This indicates that pest (such as flies) are likely to be dispersed towards receptors located north-east of the HWTS. Based on the locations of the receptors identified within Table 3.1 and Table 3.2, the prevailing wind is likely to disperse potential airborne pests away from the majority of sensitive receptors, with the exception of Intertek.

Figure 3.2 Wind rose showing the average wind direction and strength at Seal Sands (2023)



4. Pest Sources impacts, and pathways

4.1 Sources

Pests will be present when conditions on site are favourable for their existence.

Organic wastes are a common source of pests due to them having warm insulating temperatures and moisture levels which favour pest species such as flies and rats.

Odorous waste also can attract pests (such as food waste) due to the forementioned temperature and moisture levels and additionally as a source of food for pests such as birds and vermin. Residues within plastic or paper recyclable wastes can also be a potential source to attract pests to a site from the odour of the waste.

Additionally, small sized lose packaging or organic wastes (such as woodchips) could attract certain pests (such as vermin and birds) to take these wastes for nests.

The presence of birds, rats and certain edible wastes can also lead to the presence of larger domesticated pests like cats.

4.2 Incoming waste

The waste types that are most likely to attract pests tend to be organic and odorous in nature due to organic waste breaking down and causing odour. This odour can then attract pests to the Site. Below lists the types of waste and the EWC's that are likely to attract pests.

4.2.1 Odorous materials entering and leaving site

Waste deliveries to the Site will be made by road using both vehicles owned and operated by Cumbria Waste Recycling /Cumbria Waste Group and by customers delivering waste using their own vehicles (third-party deliveries).

Vehicles will include Heavy Goods Vehicles (HGVs), bulk liquid tanker vehicles and smaller commercial vehicles which are fully enclosed. All vehicles enter the Site from the internal site road and report the weighbridge which is located within the Waste Reception Area. Wastes will be loaded on to these vehicles and contained within suitable waste containers (see 4.3 below).

The Site will operate for up to seven days per week in order to manage waste throughputs, including at weekends as required. Deliveries to site will normally take place during day-time hours, 6am - 6pm.

4.2.2 Organic Materials entering and leaving the Site

Organic materials can be a significant waste source to attract pests to the Site, due to the odour produced by them and them having an optimal material, temperature and moisture level that appeals to pests. Organic materials will enter and leave the Site in the same manor that odorous materials do, as outlined above, and are likely to be the same/similar materials.

The following table below lists the EWC's codes that are to be accepted on site that may cause potential for pests to be attracted to the Site.

Table 4.1 – List waste codes that may cause potential for pests

Waste code	Description of waste	Likelihood to attract pests	Frequency of receipt	Maximum tonnage on site
02 01 02	animal-tissue waste	high	Monthly to infrequently	200 m3 or 200 tonnes
02 01 03	plant-tissue waste	high	Monthly to infrequently	200 m3 or 200 tonnes
02 01 04	waste plastics (except packaging)	medium	Weekly to monthly	200 m3 or 200 tonnes
02 01 06	animal faeces, urine and manure (including spoiled straw), effluent, collected separately and treated off-site	high	Monthly to infrequently	200 m3 or 200 tonnes
02 01 07	wastes from forestry	high	Monthly to infrequently	200 m3 or 200 tonnes
02 01 09	agrochemical waste other than those mentioned in 02 01 08	high	Daily to weekly	200 m3 or 200 tonnes
02 02 01	sludges from washing and cleaning	high	Monthly to infrequently	200 m3 or 200 tonnes
02 02 02	animal-tissue waste	high	Monthly to infrequently	200 m3 or 200 tonnes
02 02 03	materials unsuitable for consumption or processing	high	Monthly to infrequently	200 m3 or 200 tonnes
02 02 04	sludges from on-site effluent treatment	high	Monthly to infrequently	200 m3 or 200 tonnes
02 03 01	sludges from washing, cleaning, peeling, centrifuging and separation	high	Monthly to infrequently	200 m3 or 200 tonnes
02 03 04	materials unsuitable for consumption or processing	medium	Monthly to infrequently	200 m3 or 200 tonnes
02 03 05	sludges from on-site effluent treatment	high	Monthly to infrequently	200 m3 or 200 tonnes
02 04 01	soil from cleaning and washing beet	high	Monthly to infrequently	200 m3 or 200 tonnes
02 04 03	sludges from on-site effluent treatment	high	Monthly to infrequently	200 m3 or 200 tonnes
02 05 01	materials unsuitable for consumption or processing	medium	Monthly to infrequently	200 m3 or 200 tonnes
02 05 02	sludges from on-site effluent treatment	medium	Monthly to infrequently	200 m3 or 200 tonnes
02 06 01	materials unsuitable for consumption or processing	medium	Monthly to infrequently	200 m3 or 200 tonnes
02 06 02	Wastes from preserving agents	medium	Weekly to monthly	200 m3 or 200 tonnes
02 06 03	sludges from on-site effluent treatment	high	Monthly to infrequently	200 m3 or 200 tonnes
02 07 04	materials unsuitable for consumption or processing	medium	Monthly to infrequently	200 m3 or 200 tonnes
02 07 05	sludges from on-site effluent treatment	high	Monthly to infrequently	200 m3 or 200 tonnes
03 01 01	waste bark and cork	high	Weekly to monthly	200 m3 or 200 tonnes
03 01 04*	sawdust, shavings, cuttings, wood, particle board and veneer containing dangerous substances	low	Weekly to monthly	200 m3 or 200 tonnes
03 01 05	sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04	high	Weekly to monthly	200 m3 or 200 tonnes

03 03 01	Waste bark and wood	high	Weekly to monthly	200 m3 or 200 tonnes
03 03 02	green liquor sludge (from recovery of cooking liquor)	high	Weekly to monthly	200 m3 or 200 tonnes
03 03 07	mechanically separated rejects from pulping of waste paper and cardboard	medium	weekly	200 m3 or 200 tonnes
03 03 08	wastes from sorting of paper and cardboard destined for recycling	high	weekly	200 m3 or 200 tonnes
03 03 10	fibre rejects, fibre-, filler- and coating-sludges from mechanical separation	high	Monthly to infrequently	200 m3 or 200 tonnes
03 03 11	sludges from on-site effluent treatment other than those mentioned in 03 03 10	high	Monthly to infrequently	200 m3 or 200 tonnes
04 01 01	fleshings and lime split wastes	low	Weekly to monthly	200 m3 or 200 tonnes
04 01 06	sludges, in particular from on-site effluent treatment containing chromium	low	Monthly to infrequently	200 m3 or 200 tonnes
04 01 07	sludges, in particular from on-site effluent treatment free of chromium	low	Monthly to infrequently	200 m3 or 200 tonnes
04 01 09	wastes from dressing and finishing	low	Monthly to infrequently	200 m3 or 200 tonnes
04 02 20	sludges from on-site effluent treatment other than those mentioned in 04 02 19	medium	Monthly to infrequently	200 m3 or 200 tonnes
04 02 21	wastes from unprocessed textile fibres	low	Monthly to infrequently	200 m3 or 200 tonnes
04 02 22	wastes from processed textile fibres	low	Monthly to infrequently	200 m3 or 200 tonnes
04 02 09	wastes from composite materials (impregnated textile, elastomer, plastomer)	low	Monthly to infrequently	200 m3 or 200 tonnes
04 02 10	organic matter from natural products (for example grease, wax)	high	Monthly to infrequently	200 m3 or 200 tonnes
05 01 10	sludges from on-site effluent treatment other than those mentioned in 05 01 09	low	Monthly to infrequently	200 m3 or 200 tonnes
05 01 02*	desalter sludges	very low	Monthly to infrequently	200 m3 or 200 tonnes
05 01 03*	tank bottom sludges	very low	Monthly to infrequently	200 m3 or 200 tonnes
05 01 04*	acid alkyl sludges	very low	Monthly to infrequently	200 m3 or 200 tonnes
05 01 06*	oily sludges from maintenance operations of the plant or equipment	very low	Daily to weekly	200 m3 or 200 tonnes
06 05 03	sludges from on-site effluent treatment other than those mentioned in 06 05 02	low	Monthly to infrequently	200 m3 or 200 tonnes

07 01 12	sludges from on-site effluent treatment other than those mentioned in 07 01 11	low	Monthly to infrequently	200 m3 or 200 tonnes
07 02 12	sludges from on-site effluent treatment other than those mentioned in 07 02 11	low	Monthly to infrequently	200 m3 or 200 tonnes
07 03 12	sludges from on-site effluent treatment other than those mentioned in 07 03 11	low	Monthly to infrequently	200 m3 or 200 tonnes
07 04 12	sludges from on-site effluent treatment other than those mentioned in 07 04 11	low	Monthly to infrequently	200 m3 or 200 tonnes
07 05 12	sludges from on-site effluent treatment other than those mentioned in 07 05 11	low	Monthly to infrequently	200 m3 or 200 tonnes
07 06 12	sludges from on-site effluent treatment other than those mentioned in 07 06 11	low	Monthly to infrequently	200 m3 or 200 tonnes
07 07 12	sludges from on-site effluent treatment other than those mentioned in 07 07 11	low	Monthly to infrequently	200 m3 or 200 tonnes
10 01 21	sludges from on-site effluent treatment other than those mentioned in 10 01 20	low	Monthly to infrequently	200 m3 or 200 tonnes
10 03 26	sludges and filter cakes from gas treatment other than those mentioned in 10 03 25	low	Monthly to infrequently	200 m3 or 200 tonnes
10 04 07*	sludges and filter cakes from gas treatment	very low	Monthly to infrequently	200 m3 or 200 tonnes
10 05 06*	sludges and filter cakes from gas treatment	very low	Monthly to infrequently	200 m3 or 200 tonnes
10 06 07*	sludges and filter cakes from gas treatment	very low	Monthly to infrequently	200 m3 or 200 tonnes
10 07 05	sludges and filter cakes from gas treatment	low	Monthly to infrequently	200 m3 or 200 tonnes
10 08 18	sludges and filter cakes from flue-gas treatment other than those mentioned in 10 08 17	low	Monthly to infrequently	200 m3 or 200 tonnes
10 08 18*	sludges and filter cakes from flue-gas treatment other than those mentioned in 10 08 17	very low	Monthly to infrequently	200 m3 or 200 tonnes
10 11 18	sludges and filter cakes from flue-gas treatment other than those mentioned in 10 11 17	low	Monthly to infrequently	200 m3 or 200 tonnes
10 12 13	sludge from on-site effluent treatment	low	Monthly to infrequently	200 m3 or 200 tonnes
11 01 10	sludges and filter cakes other than those mentioned in 11 01 09	low	Monthly to infrequently	200 m3 or 200 tonnes
11 02 02*	sludges from zinc hydrometallurgy (including jarosite, goethite)	very low	Weekly to monthly	200 m3 or 200 tonnes
11 03 02*	other wastes	very low	weekly	200 m3 or 200 tonnes

17 02 01	Wood	medium	Weekly	200 m3 or 200 tonnes
19 05 01	non-composted fraction of municipal and similar wastes	high	Monthly to infrequently	200 m3 or 200 tonnes
19 05 02	non-composted fraction of animal and vegetable waste	high	Monthly to infrequently	200 m3 or 200 tonnes
19 05 03	off-specification compost	high	Monthly to infrequently	200 m3 or 200 tonnes
19 06 03	liquor from anaerobic treatment of municipal waste	high	Monthly to infrequently	200 m3 or 200 tonnes
19 06 04	digestate from anaerobic treatment of municipal waste	high	Monthly to infrequently	200 m3 or 200 tonnes
19 06 05	liquor from anaerobic treatment of animal and vegetable waste	high	Monthly to infrequently	200 m3 or 200 tonnes
19 06 06	digestate from anaerobic treatment of animal and vegetable waste	high	Monthly to infrequently	200 m3 or 200 tonnes
19 08 01	Screenings	high	Monthly to infrequently	200 m3 or 200 tonnes
19 08 02	waste from desanding	high	Monthly to infrequently	200 m3 or 200 tonnes
19 08 05	sludges from treatment of urban waste water	high	Monthly to infrequently	200 m3 or 200 tonnes
19 08 06*	saturated or spent ion exchange resins	low	Monthly to infrequently	200 m3 or 200 tonnes
19 08 07*	solutions and sludges from regeneration of ion exchangers	medium	Monthly to infrequently	200 m3 or 200 tonnes
19 08 08*	membrane system waste containing heavy metals	low	Monthly to infrequently	200 m3 or 200 tonnes
19 08 09	grease and oil mixture from oil/water separation containing only edible oil and fats	high	Monthly to infrequently	200 m3 or 200 tonnes
19 08 10*	grease and oil mixture from oil/water separation other than those mentioned in 19 08 09	high	Monthly to infrequently	200 m3 or 200 tonnes
19 08 12	sludges from biological treatment of industrial waste water other than those mentioned in 19 08 11	high	Monthly to infrequently	200 m3 or 200 tonnes
19 08 14	sludges from other treatment of industrial waste water other than those mentioned in 19 08 13	high	Monthly to infrequently	200 m3 or 200 tonnes
19 09 02	sludges from water clarification	high	Monthly to infrequently	200 m3 or 200 tonnes
19 09 03	sludges from decarbonation	high	Monthly to infrequently	200 m3 or 200 tonnes
19 09 06	solutions and sludges from regeneration of ion exchangers	high	Monthly to infrequently	200 m3 or 200 tonnes
19 12 07	wood other than that mentioned in 19 12 06	high	Monthly to infrequently	200 m3 or 200 tonnes
19 13 04	sludges from soil remediation other than those mentioned in 19 13 03	high	Monthly to infrequently	200 m3 or 200 tonnes
19 13 06	sludges from groundwater remediation other than those mentioned in 19 13 05	high	Monthly to infrequently	200 m3 or 200 tonnes
20 01 01	paper and cardboard	high	Weekly	200 m3 or 200 tonnes

20 01 08	biodegradable kitchen and canteen waste	high	Weekly to monthly	200 m3 or 200 tonnes
20 01 37*	wood containing dangerous substances	high	Weekly to monthly	200 m3 or 200 tonnes
20 01 38	wood other than that mentioned in 20 01 37	high	Weekly to monthly	200 m3 or 200 tonnes
20 02 01	biodegradable waste	high	Weekly to monthly	200 m3 or 200 tonnes
20 03 01	mixed municipal waste	medium	Weekly to monthly	200 m3 or 200 tonnes
20 03 02	waste from markets	medium	Weekly to monthly	200 m3 or 200 tonnes
20 03 03	street-cleaning residues	high	Weekly to monthly	200 m3 or 200 tonnes
20 03 04	septic tank sludge	high	Weekly to monthly	200 m3 or 200 tonnes
20 03 06	waste from sewage cleaning	high	Weekly to monthly	200 m3 or 200 tonnes
20 03 07	Bulky waste	low	Weekly	200 m3 or 200 tonnes

4.3 Waste Containers

All wastes accepted at the HWTS are contained within appropriate enclosed waste containers. Waste acceptance checks will confirm the packaging has not become damaged during transport and is capable of containing the waste materials. In the event of a damaged waste container, quarantine measures will be applied and remedial actions carried out. Typical waste containers will include (but are not limited to):

- 4-wheeled bins;
- 2-wheeled bins;
- 1,000 litre intermediate bulk containers (IBCs);
- Bottles;
- Drums;
- Kegs;
- Jerry cans; and
- Waste sacks.

Hazardous waste is typically delivered within type approved packaging that is compliant with the requirements of carriage of dangerous goods legislation (as required) depending upon the properties of the waste. Solid wastes may use a combination of two-part packaging which provides an additional layer of containment against pests and to prevent the waste being a source which attracts pests e.g. waste sacks inside of wheeled bin.

Liquid wastes are delivered within sealed tanker vehicles or within sealed portable containers (e.g. Intermediate Bulk Containers (IBCs)).

Loose wastes and solid wastes in bulk are not accepted at the Site and therefore all waste accepted at the Site is contained/covered already which reduces the likelihood of waste being attractive to pests and a source of material which pests will use for food, reproduce in or use for nesting.

Special instructions for deliveries of waste are agreed at the pre-acceptance stage for all wastes being delivered to the Site and all vehicles (including Cumbria Waste Recycling or third party) will need to adhere to the Site rules. The Site will not accept wastes that are infested by pests or not suitably packaged, and this will be determined at the waste pre-acceptance stage. If a waste is delivered to the Site that is infested by pests or loose, it will be rejected and the carrier will have to return it to the waste producer to prevent the impacts of nuisance.

All wastes are opened and sampled when they arrive at the Site. If the load is judged to be infested by pests on arrival or showing signs that pests are present within the load (e.g. presence of eggs, larvae or juveniles) the driver will contact the weighbridge office for further instruction on transporting the waste to another waste management facility (if deemed necessary). Acceptance of pest infested wastes is contrary to Transfer Station site rules.

4.4 Storage areas

All wastes will be stored as a minimum within the waste container that they were accepted within unless, the waste type has been repackaged or bulked up (with other wastes of the same type). All wastes that have been subject to repackaging will still be stored within a suitable, enclosed waste container as outlined in the section above.

No wastes will be accepted onto site which is loose therefore no wastes will be stored loose.

Containers will be store in the most suitable storage location sat the Site including inside of the main warehouse, one of the yards, the flammable area yard storage or the secure store depending on the nature of the waste within the container. The storage capacity for each location is listed below:

- Main Warehouse (no flammable wastes) with a storage capacity of 816 pallet spaces (equivalent to 816 tonnes/m3).

- Flammable Yard Storage with a total storage capacity of 324 pallet spaces (324 tonnes/m3) consisting of 108 pallet spaces (equivalent to 108 tonnes/m3 in covered storage and 216 pallet spaces (equivalent to 216 tonnes/m3) in uncovered storage.
- Small Warehouse storage with a storage capacity of 25 pallet spaces (equivalent to 25 tonnes/m3).
- Rear storage yard with a storage capacity of 400 pallet spaces (equivalent to 400 tonnes/m3).
- Bottom yard with a storage capacity of 400 pallet spaces (equivalent to 400 tonnes/m3).

Wastes will not be stored for longer than six months from the date of acceptance of the waste and in accordance with relevant Appropriate Measures where a duration of less than six months is specified.

Due to all waste sources being containerised, this should prevent the risk of pest infestation as there will be no direct pathway to attract pests to the wastes.

4.5 Infrastructure and housekeeping

Good housekeeping practices will be carried out on site to prevent the accumulation of litter which could potentially attract pests.

Housekeeping will ensure that the Site, plant and equipment are cleaned regularly to ensure that little, rubbish, and dirty conditions or equipment can't build up and be a source of housing, nesting or food for pests. Additionally, spillages will be cleaned up immediately using the provided equipment, such as spill kits, that are placed around the Site.

As a significant amount of waste handled and stored by the HWTS is liquid waste, there is less likely to be an attractive source of waste to pests than solid waste, and will contribute to further reducing the attractiveness of the waste at the Site to pests.

4.6 Pest pathways

If an incident was to occur where pests were found on site, then there is the opportunity for off-site dispersal following pathways and potentially giving rise to localised nuisance, hazard and pollution.

Identifying and minimising these pathways are essential to reduce the risk associated with off-site dispersal.

4.6.1 Flies

Most adult flies tend to stay close to their breeding sites however a proportion will disperse away which may cause problems at nearby receptors. Significant problems with flies are likely to cause unacceptable nuisance levels but tend to occur within 500m of the source; because there are no residential receptors within 500m of the Site, this will significantly reduce the impact of fly related pest complaints at residential receptor.

High levels of breeding at the source are normally what causes high dispersal levels which are elevated during calm, warm weather. In the event of preferential weather conditions, staff working at the Site will have elevated vigilance to the presence of flies and presence of wastes that are attractive to flies.

The Site should not be a cause of dispersal for flies and there should not be a pathway for them to be attracted to the waste in the first instance, as all waste is within sealed containers. In the event of a potential spillage of waste on site this will be cleared up immediately to ensure it does not create a pathway for pests. Additionally, if waste that was infested with flies was to be brought to site this would be subject to acceptance checks and rejected as not to create a source of breeding flies which could disperse.

Trigger levels for flies that would result in additional monitoring checks and could result in fly control measures being required includes:

- Multiple substantiated complaints over seven days from an offsite receptor regarding flies and fly activity;
- The identification of fly infested wastes from within storage of any part of the HWTS;
- A consignment of waste being rejected from the Site due to being infested by flies. Proactive checks will be completed of all other wastes arriving on the same consignment/from the same consignee until the waste has been transferred offsite or treated onsite; and

- Reports of flies swarming or increased observations of flies within the perimeter of the Site by staff, visitors, contractors or a neighbour.

Additional proactive monitoring for flies will be completed during fly breeding seasons – currently normally between April and October (although subject to prolonged preferential weather conditions).

4.6.2 Vermin

Vermin are generally attracted to sewers, culverts, pipes and areas of abundant vegetation. Additionally, they are also very attracted to odours waste in particular food wastes (which is likely to be accepted at the HWTS in suitable waste containers).

The Site should not attract vermin due to all of the waste being accepted, stored and removed from the Site within suitable primary waste containers and within secondary bulk containers. This ensures that there is no pathway through odour from a waste source for vermin to be attracted to. Additionally, as mentioned within the Odour Management Plan the Site should not be inherently odorous and the procedures within this Odour Management Plan will be carried out on site to ensure that odour is minimised at all times.

If an odour event was to occur which would attract vermin all waste is stored in containers which would ensure vermin could not gain access to the waste and cause an infestation.

Proactive vermin control will be employed at the Site, using an approved supplier of pest control services which will include (but is not limited to) use of rodent bait boxes/bait stations to attract vermin.

Trigger levels for vermin that would result in additional monitoring checks and could result in vermin control measures being required includes:

- Substantiated complaint from an offsite receptor regarding vermin (e.g. rats) and vermin activity;
- Reports from site neighbours of noticeable vermin activity at, near or close to site perimeters;
- A report from the contracted vermin control company of increased activity/increased mortality of vermin within bait boxes.
- The identification of vermin infested wastes from within storage of any part of the HWTS;
- A consignment of waste being rejected from the Site due to being infested by vermin. Proactive checks will be completed of all other wastes arriving on the same consignment/from the same consignee until the waste has been transferred offsite or treated onsite; and
- Reports of vermin activity (e.g. droppings/faeces, nesting, smear marks low down, gnaw marks) within the perimeter of the Site by staff, visitors, or contractors.

4.6.3 Birds

Birds are often found at sites where they can scavenge for food and they are capable of dispersing over significant distances and creating nuisance in the local areas.

As stated above all the waste being accepted, stored and removed from the Site will be done so within different types of primary and secondary containers. This ensures there is no pathway for birds to be attracted to the waste.

Regular housekeeping is in place to ensure the Site is kept free of litter that would potentially attract birds. If birds were to become an issue to site and significant complaints were received the Site would carry out mitigation measures to rectify this such as;

- reevaluate the frequency of housekeeping/cleaning;
- increase the frequency of proactive litter picking across the Site; and
- sourcing proactive bird management e.g. hiring a hawk service to scare away birds from the Site in the short term while the housekeeping is being changed.

Trigger levels for birds that would result in additional monitoring checks and could result in vermin control measures being required includes:

- Substantiated complaint from an offsite receptor regarding birds and bird activity (e.g. fouling from birds);
- Reports of birds and bird nesting activities within the perimeter of the Site by staff, visitors, or contractors.

4.7 Pest impact

Due to the Sites location within an industrial area, vulnerable human receptor such as housing estates and schools are at least 3.8 km away and are unlikely to impacted if a pest incident was to occur on site due to flies and vermin not having this wide of a dispersal distance. The industrial sites closer to the Site could be impacted if a pest outbreak was to occur on the Site.

Table 2 below outlines the impacts from each of the potentially pests previously mentioned.

Table 2 Pest impacts

Pest	Impact
Flies	Visual – negative associations as unhygienic
	Nuisance – disruption, annoyance, irritating, unpleasant etc
Vermin	Fear, spread of disease
	Damage to buildings / property
	May attract birds
	Health & Safety – Rodent urine can contain bacteria that causes Weil's Disease, a severe form of leptospirosis which is transferable to humans. Transmission occurs when contaminated water or soil enters the body through cuts, scratches or mucous membranes. Symptoms include high fever, severe headache, muscle aches, red eyes, kidney failure and/or bleeding.
Birds	Visual – negative association with scavenging
	Noise – circling in the area and feeding
	Health & safety – bird droppings can cause: Histoplasmosis (respiratory difficulties), Cryptococcosis (flu, fever and sometimes fatalities), Ornithosis (flu type disease, can cause fatalities) and Campylobacteriosis (can cause diarrhoea or dysentery syndrome, mostly but can also include cramps, fever and pain).

5. Fly control – appropriate measures

Immature stages of flies could be brought on site (particularly during warmer months) within the waste and may emerge as adults. Due to the nature of the waste being within containers this is less likely to occur at the HWTS than other waste management sites handling loose wastes. If this was to occur and flies were to become a problem on site; the following section should be used to mitigate this.

5.1 Operation control – appropriate measures

Key site staff will be trained in identifying flies, understanding the importance of fly prevention and monitoring/recording fly-infested loads. They will also ensure that if a contractor is brought in that their work is closely monitored and to ensure they have the appropriate site safety qualification or certification.

Fly monitoring should also be carried out if there is a concern that flies are being attracted to the Site, especially during the warmer months; fly sheets will be used during summer months to proactively monitor for the presence of flies if key staff identify an increase risk or there are reports of flies.

When containers are moved or primary waste containers removed from bulk containers, the will be checked for larvae and/or pupae; in particular organic wastes and putrescible wastes being stored on the Site will be highlighted by the Transfer Station Manager with enhanced frequency of checks completed. As required during hot ambient temperatures, this may be more than once per day. If fly monitoring shows evidence that fly numbers are increasing non-chemical or physical appropriate measures should look to be put into place on site to prevent an infestation.

5.2 Fly prevention

Due to the nature of all waste being accepted onto site in primary containers and stored on site within enclosed buildings and/or closed secondary waste containers there should be no requirement for additional fly prevention measures, as there is no a pathway for flies to be attracted to the waste source.

If flies were to become a problem on the Site or significant complaints were received this would be revaluated and additional fly prevention methods would be looked to be implemented at the Site.

5.3 Non-chemical appropriate measures

Regular housekeeping is in place on the Site to keep areas clear and clean this should ensure that flies are not attracted to the Site.

Enforcing pre-acceptance and acceptance checks will ensure that wastes that may attract flies, such as already fly infested waste or damaged containers, do not enter the Site. Preventative actions should ensure that later mitigation methods listed below are not necessary.

5.4 Physical appropriate measures

In areas where staff are present such as offices and welfare facilities, good housekeeping will be in place to keep these areas free of litter that could potentially attract flies. Additionally physical measures such as adhesive fly papers will be in place to ensure that flies don't have the opportunity to breed in these areas and cause an infestation on site.

5.5 Biological appropriate measures

Waste acceptance checks will be carried out of all loads entering the Site, these checks will include checking for potentially infested loads. If loads are infested, they will be rejected and not enter site.

If a fly infestation may be occurring this waste will be separated and moved off site as soon as possible however the risk of the infestation spreading to other wastes is minimal due to all waste being stored within containers and not exposed.

5.6 Chemical appropriate measures

As a final measure against a fly infestation at the Site insecticides may be considered to be used however this will be used only as an intervention when absolutely necessary and not as routine.

There is no plan for insecticide sprays to be used or stored on site and if they are required to treat an infestation relevant training will be given to site staff on how to safely use and stored the sprays. Additionally, if insecticides are brought onto site they will be stored and used to comply with the manufacturer's details.

In all cases, appropriate measures will be implemented as a first step.

6. Vermin control – appropriate measures

Due to the nature of the waste being within containers on site it is unlikely that vermin will be attracted to the Site and cause a problem however, if vermin were to begin to cause a problem on site the following section should be used to mitigate this.

6.1 Vermin prevention

Due to the nature of the waste being accepted onto site and stored within containers vermin impacts are less likely to occur at the HWTS than other waste management sites. The likelihood of additional vermin prevention measures being required is reduced since the waste is contained within containers and the pathway for vermin to be attracted to the waste has been broken.

If vermin were to become a problem on the Site or significant complaints were received this would be revaluated and additional vermin prevention methods would be looked to be instated at the Site.

6.2 Operation control – appropriate measures

Site staff will be vigilant for signs of vermin activity (e.g. droppings/faeces, nesting, smear marks low down, gnaw marks) within the Site and report these to the Transfer Station Manager and on the electronic Near Miss/Incident/Accident reporting and tracking system. If vermin begin to cause on issue on site professional advice would be sought from a reputable pest controller to carry out a risk assessment of the Site and implement necessary actions to control, prevent and minimise further vermin impacts. This would ensure that pest could be identified and the appropriate prevention and mitigation measures instated to control the potential infestation.

6.3 Physical appropriate measures

Bait boxes will be placed around the Site to mitigate against vermin numbers building up on site. Additional physical appropriate measures will be put in place if suggested after seeking professional advice from a reputable pest controller.

6.4 Other appropriate measures

In the unlikely event that the forementioned appropriate measures are not sufficient in handling a vermin outbreak professional guidance will be sought to identify what other measures could be put in place to handle a vermin problem. Due to waste entering and being stored on site in containers it is unlikely that a vermin outbreak to occur on site in the first instance.

7. Pest monitoring

Pest are highly unlikely to be attracted to the Site due to wastes being stored within containers, however on-going monitoring will be carried out on site to establish trends to ensure any potential problems are observed early and can be prevented quickly.

7.1 Monitoring methods

Regular monitoring will be carried out to assess confirm that any vermin, birds and insects are under control. The presence of pests will be regularly assessed by site staff and any issues related to vermin, birds or insects identified reported to site management for investigation. Incidents of the presence of pests will be reported to the Transfer Station Manager.

To monitor for pests, site staff undertaking daily inspections will check the following;

- Pests / Nesting Areas / faeces routes,
- Waste Storage Areas inspections,
- Cladding area inspections,
- Vegetation,
- Drainage,
- Infrastructure / gnawing evidence,
- Litter.

Should a pest nuisance be identified during routine inspection then an investigation of the source of the nuisance will be undertaken. In the unlikely event the pest nuisance is attributed to the Site the following remedial actions may include but be not limited to:

- Checking storage areas to identify the source of the nuisance
- Removal of the waste causing the nuisance at the earliest opportunity
- Cleaning of the storage areas
- Inspecting other containers for damage due to pests
- Arrival of pest control contractor on site

7.2 Resistance

The continued and prolonged use of insecticides can cause the pests to build up resistance; this should not cause issue at the Site as insecticides are a last resort that are no likely to be necessary due to the nature of how the waste is stored not attracting pests.

7.3 Trigger levels

If a large volume of complaints are received about pests due to the Site this will be investigated and if cannot be resolved by removing the issue waste from the Site, other appropriate measures will be put in place as mentioned previously (in Section 5 and Section 6).

A professional pest control contractor will be called onto site to investigate the source if necessary.

8. Pest reporting

8.1 Complaints reporting

CWR records incident/accident occurrences that occur at the installation on the internal company reporting Near Miss / Incident / Accident reporting and tracking system. This system is accessible to all employees, visitors and contractors working onsite who can report a Near Miss / Incident / Accident electronically using QR codes which are displayed around the Site. Incidents of pest complaint received by the Site and incidents due to pests on site will be recorded as a non-conformance.

When an external complaint is received, CWR will aim to acknowledge the complaint within 24 hours or on the next working day. All pest complaints will be investigated promptly, and any immediate appropriate remedial action will be taken e.g. temporarily pausing operations, repackaging of waste causing issue into additional containers and removal of materials attracting pests off site as soon as reasonably possible. CWR will aim to respond to all enquiries within 5 working days.

If required as a result of a pest incident, a member of site staff will conduct an assessment of the waste being stored at the location where the complaint came from. This will enable the Site to identify any sources of pests that are related to the Site operations.

Any pest incident, which has caused, or may cause further incident at an offsite location should be reported in accordance with the requirements of WI145, Environmental permit notification of significant adverse environmental effects, should be followed.

A substantiated pest complaint may also be triggered to review the efficacy of control measures used with potential source that attract pests and lead to changes to Work Instructions and operating procedures.

8.2 Community engagement

The location of Seal Sands HWTS is within an industrial estate, away from sensitive residential receptors but Cumbria Waste Recycling will aim to be a good neighbour to the other businesses operating at the industrial estate.

Cumbria Waste Recycling will engage with all of its immediate neighbours to establish an open-door policy. This will encourage and enable any complaints from neighbouring premises (if received) to be dealt with immediately. Details of how to contact the Site will be available at the site entrance on the site notice board which will also include contact details for the Environment Agency.

It is unlikely that the Site will attract pests however if an incident due to pests was to occur, the Transfer Station Manager will act as an Incident Controller and follow the requirements of the Accident Management Plan to implement emergency procedures, including contacting the Environment Agency (if required). This may include support from CWR resources and emergency services as required to contact neighboring sites. In the event of the Transfer Station Manager not being onsite, their designated deputy will act as emergency coordinator and Incident Controller.

Appendix A – Key Contacts

Position	Name	Telephone Number	Email
Operations Director	Duncan Millar	07776 194274	duncan.millar@cumbriawaste.co.uk
Transfer Station Manager (Seal Sands HWTS)	Neil Trueman	07502 548798	Neil.trueman@cumbriawaste.co.uk
Head of Hazardous Waste	Neil Trueman	07502 548798	Neil.trueman@cumbriawaste.co.uk
H & S Manager	Anthony Hope	07920 651014	anthony.hope@cumbriawaste.co.uk
Group Head of SHEQ	Andrew Simpson	07385 500756	andrew.simpson@cumbriawaste.co.uk
Environment Manager	Pam Tait	07876 552056	Pam.Tait@cumbriawaste.co.uk
Environment Agency	Incident Hotline	0800 807060	n/a
Emergency Services: • Police • Fire • Ambulance • Coastguard		**999**	n/a

wsp.com