

# Biffa Waste Services Limited Middlesbrough Waste Transfer Station Environmental Management System

**December 2023** (revision 1 - May 2024)

# **Contents:**

1. GE	NERAL CONSIDERATIONS	4
1.1	Scope and Purposes	4
1.2	Site Operation / Licence Holder	4
1.3	Permit Details	4
1.4	Permitted activities	5
1.5	Permit Area	5
1.6	Site Location	5
1.7 Ser	nsitive Receptors	5
1.8	Permitted Waste Types and Annual Tonnage	6
1.9	Operational Hours	6
1.10	Technical Competent Management	6
1.11	Staffing and Training	7
2 SI1	E INFRASTRUCTURE	7
2.1.	Access and Parking	7
2.2	Notice Board and Signs	7
2.3	Site Security	8
2.4	Site Office and Records	8
2.5	Weighbridge	8
2.6	Fuel and Chemical Storage	9
2.7	Vehicles, Plant and Equipment	9
2.8	Drainage	10
3 SI1	E OPERATIONS	10
3.1	Waste Activities	10
3.2	Waste Acceptance Procedure	10
3.3	Non-conforming waste streams	11
3.4	Waste Storage	11
3.5	Waste Management	12
4 EN	VIRONMENTAL CONTROL, MONITORING AND REPORTING	12
4.1	Potentially polluting leaks and spillages	12
4.2	Environmental Monitoring	13
4.3	Environmental Reporting	13
4.4	Site Inspections and Maintenance	13
4.6	Housekeeping	13
5 AM	ENITY CONTROL	14

	5.1	Control of Mud and Debris	14
	5.2	Control and Monitoring of Dust	14
	5.3	Litter Control	15
	5.4	Control of Pests, Birds and Scavengers	16
	5.5	Control and monitoring of Noise and Vibrations	16
	5.6	Odour Control	16
	5.7	Control of fire	17
5	REP	PORTING	18
	6.1	EA Reporting Mechanism	18
	6.2	Complaints Procedure	18

# **List of Appendices:**

**Appendix EMS1:** Permitted EWC codes

**Appendix EMS2:** Waste Acceptance Procedure

Appendix EMS2A: Handling of asbestos waste at a Waste Transfer Station: Main Operational Features

and Safe Systems of Work.

# **List of Drawings**

**Environmental Permit Boundary:** M8030100

Site Layout Plan: M8030200 Sensitive Receptors: M8030300 Fire Prevention Plan: M8030401 Drainage Plan: M8030501

#### 1. GENERAL CONSIDERATIONS

#### 1.1 Scope and Purposes

This Environmental Management System (EMS) seeks to minimise the risk of pollution from the permitted operation EPR/BB3100LE. This system/plan refers to the risk assessments that were prepared during the application process and details how those risks are mitigated through waste management control measures and operational arrangements for Middlesbrough Transfer Station].

All operations on site are carried out in accordance with an overarching Management System, the Biffa Group Integrated Management System (GIMS), which is externally certified by NQA who are accredited by UKAS to the following standards:

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

At the strategic level GIMs is intended to assist senior leadership team to develop the strategy and establish policy to manage risk and opportunities facing the wider business. GIMs provides at the tactical level a central platform which is available to all staff at any time times, providing established mandatory Biffa Group Standards supported by Management Operational Guidance that seek to implement the set strategy. This information comprises of written processes, guidance, forms and procedures necessary to manage day to day health, safety and environmental risks.

This EMS is part of the operational level documentation that is informed by the Policies, Group Standards and Management Operational Guidance to ensure compliance with the site-specific requirements of the Environmental Permit.

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

This EMS will be reviewed on an annual basis and updated if required. A review of the EMS will also be undertaken following;

- After any significant environmental accident, permit breach or other relevant incident.
- The issue of an Environmental Permit variation by the Environment Agency;
- A material change to the operational process;
- A substantiated significant complaint; or
- Any changes in legislation or guidance documents applicable to the Redcar Plastics Recycling Facility.

# 1.2 Site Operation / Licence Holder

The site operates under an Environmental Permit (EP) at Middlesbrough Waste Transfer Station, Brunel Road, Skippers Lane Industrial Estate, Middlesbrough, TS6 6JA.

This permit is for the operation and management of a household, industrial and commercial waste transfer station.

The operator is Biffa Waste Services Limited whose registered address is Coronation Road, Cressex, High Wycombe, United Kingdom, HP12 3TZ.

# 1.3 Permit Details

The site previously held a Standard Rules permit (SR2008 No.3) for a household, commercial and industrial waste transfer station with treatment. However, the site now requires a bespoke environmental permit for a household, commercial and industrial waste transfer station with treatment which also permits the acceptance of asbestos, and the ability to store waste in external bays.

#### 1.4 Permitted activities

The Site operates as a general wastes transfer station, including receipt of asbestos wastes for transfer, and as a vehicle depot.

The waste operations carried out on site are detailed below:

- **D15:** Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where the waste is produced).
- **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).
- **D14:** Repackaging prior to submission to any of the operations numbered D1 to D13.
- **D9:** Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are disposed of by any of the operations numbered D1 to D12.
- R3: Recycling/reclamation of organic substances which are not used as solvents.
- **R4**: Recycling/reclamation of metals and metal compounds.
- **R5**: Recycling/reclamation of other inorganic compounds.

#### 1.5 Permit Area

The permitted area is shown on Drawing (M8030100) Environmental Permit Boundary. All references to the 'site' in this FPP refer to the permitted area, including infrastructure, plant, and equipment.

#### 1.6 Site Location

The site is situated on the Skippers Lane Industrial Estate, located 3km east of Middlesbrough. The National Grid Reference (NGR) for the site is NZ 52792 20225.

Since the site is situated on the Skippers Lane Industrial Estate, the immediate surrounding land use is primarily industrial.

#### 1.7 Sensitive Receptors

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, cultural and heritage 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;
- Areas of Outstanding Natural Beauty:
- National Nature Reserves; and
- National Parks:
- World Heritage Sites;
- Scheduled Monuments;
- Registered Battlefields; and
- Registered Parks and Gardens.

Table 1 identifies the locations of receptors that are considered to be potentially sensitive and could reasonably be affected by the activities occurring on site.

**Table 1: Identified Sensitive Receptors** 

Receptor Name	Receptor Type	Direction from Site	Approximate distance from Site boundary at closest point (m)
Public Greenspace	Fields	North	180m
Residential properties in South Bank	Residential Properties	West	1000m
Industrial premises on Skippers Lane	Commercial /	Adjacent/Surrounding	0 - 100m
Industrial Estate	Industrial	the site	
Brunel Road	Highways	West	100m
Webb Road	Highways	South	60m
Owens Road	Highways	East	40m
Middlesbrough Road	Highways	North	200m
Cleveland Retail Park	Retail	Southeast	480m
Residential properties at Brambles Farm	Residential	Southwest	500 - 1000m
A66	Major Roadway	North	485m
AVG Biogas plant	Industrial	North	851m
Railway line	Transport link	North	945m
St. Peter's Catholic College	School	East	1000m
Spencer Beck	Woodland	South	480m
Church of Saint Peter	Listed Building	Northeast	785m
War memorial circa 5m SW of Church of Saint Peter	Listed Building	Northeast	773m
War memorial	Listed Building	Northeast	925m
1 Millbank Street	Listed Building	Northeast	825m
Church of St John the Evangelist	Listed Building	Northeast	987m

The Sensitive Receptors are detailed on drawing M8030300.

# 1.8 Permitted Waste Types and Annual Tonnage

The Environmental Permit allows waste types to be accepted on site which are defined as 'combustible materials' in the FPP Guidance. The full list of permitted waste types accepted on site can be found in the Environmental Permit for the Site and are detailed in Appendix EMS1.

The permitted maximum annual tonnage for the site is 75,000 tonnes.

# 1.9 Operational Hours

The hours of operation for the site are detailed below:

Day	Hours
Monday to Friday	07:00 - 17:00
Saturdays, Sundays, and Bank Holidays	07:00 to 13:00

# 1.10 Technical Competent Management

The site is managed by sufficient competent staff to operate the site in accordance with the permit. Operations at the site are under the control of technically competent persons who hold the relevant competence certificate and have demonstrated their continuing competence. Biffa competent persons all hold a qualification issued by the CIWM Waste Management Industry Training and Advisory Board (CIWM (WAMITAB)) scheme.

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. A lower attendance than 20%

can be agreed with the Environment Agency and if this has been done a copy of the agreement should be available for inspection.

If the primary TCM is scheduled to be on leave or is not available to attend due to unforeseen circumstances, an alternant suitably competent individual will visit the site to meet the attendance requirement. All TCM's will record their attendance in the site diary.

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.

# 1.11 Staffing and Training

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;
- Records of training needs and training received are maintained.

#### 2 SITE INFRASTRUCTURE

# 2.1. Access and Parking

The site is accessed by site staff and visitors via a security gate located on Brunel Road, off the A66 which runs parallel to the north of the site. There is a car parked labelled accordingly and is located on the right upon entry to the site.

Collection vehicles enter the site via Webb Road (off Brunel Road) and drive directly onto the Weighbridge opposite the entrance gate.

The site entrance and all the other permitted areas of the site are covered by suitable hard standing such as concrete or tarmac, and the perimeter of the site is kerbed.

Yard surfaces are maintained free from potholes and in a clean and tidy condition. The floor of the transfer building is formed from impermeable concrete.

Visual checks of the integrity of the impermeable surface are made weekly, and any issued are recorded on the daily site inspection form.

### 2.2 Notice Board and Signs

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.

Directional signs are located around the site to indicate traffic flow, advise of possible dangers on the premises, and other site user information in relation to health and safety. All notices and signs will be kept in a clean legible condition.

#### 2.3 Site Security

All reasonable precautions are taken to minimise unauthorised access to the site.

The entire site, including the permitted area and site car park, is surrounded by a 2 meter high galvanised palisade security fence, with a 2 meter high security gate at the site entrance. The entrance gate is locked outside opening hours.

The site has full CCTV coverage which records 24/7 and the recorded footage is stored for 28 days. The site benefits from an out of hours security guard who monitors the CCTV and undertakes regular checks of the site outside of operational hours.

Artificial lighting will be provided for the operations to be carried out within the permitted area. The lighting will be used in periods of darkness and at times when lack of daylight impairs vision. A lighting review will be carried out to ensure levels are adequate for the site and all lighting will be properly maintained.

#### 2.4 Site Office and Records

The site office is located near the site entrance gate within the permitted site boundary.

A list of environmental compliance documentation kept in the site office or available electronically, such as:

- Environmental Permit;
- Other authorisations (TEDCs);
- Environmental Management System including site plans (associated environmental documentation FPP etc. and monitoring data where applicable);
- Site Diary/Daily log (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);
- In-house daily and weekly inspection sheets;
- Duty of Care Transfer Notes (legally should be kept for 2 years, however, Biffa policy states 3 years);
- Consignment Notes (legally should be kept at least 3 years);
- ABP commercial documents (3 years);
- Visitor Book;
- Accident Book;
- Staff competency / training records / visitor/contractor inductions; and
- Relevant permits to work and RAMS.

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

The site has one weighbridge which is located opposite the collection vehicle entrance to the site on Webb Road, to measure the vehicles incoming material loads.

The weighbridge is connected to Integrated Material Systems (IWS) material management software to ensure all waste is recorded and can be audited accordingly.

A computerised weighbridge ticket is produced, and the driver is given the relevant paperwork. Weighbridge ticket details include:

- 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.

The weighbridge is always manned during operational hours when waste is received to site.

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

#### 2.6 Fuel and Chemical Storage

The site stores hazardous and combustible non-waste materials which enable the operations to take place at the site, the majority of the substances detailed below are used in relation to the on-site workshop. No substances are stored within the transfer shed, and none of them are stored within 6m of any waste storage areas on site. These non-waste materials are stored on site and their containment methods are detailed in Table 1 below. The areas in which these non-waste materials are stored is identified on the Site Layout Plan, M8030200.

Details of fuel and chemicals kept on site:

Fuel/Chemical	Form	Containment	Quantity/Volume	Storage location
Diesel	Liquid	Double skinned bunded above ground tank	2,500 litres	Under canopy in the yard
AdBlue	Liquid	Double skinned bunded above ground tank	5,000 litres	Under canopy in the yard
Oxygen	Gas	Gas Cage	50 litres	Vehicle Workshop under canopy
Argon	Gas	Gas Cage	50 litres	Vehicle Workshop under canopy
Hydraulic Oil & Gear Box Oil	Liquid	Double skinned bunded above ground tank	3 x 1,800 litre tanks	Vehicle Workshop
Waste Oil	Liquid	Double skinned bunded above ground tank	2,000 litres	Vehicle Workshop
Aerosols used in vehicle workshop (e.g. brake cleanser)	Gas	COSHH Cabinet	Various (15 litres)	Vehicle Workshop

# 2.7 Vehicles, Plant and Equipment

Plant and Equipment are operated and maintained in accordance with the manufacturer's recommendations. Plant maintenance is recorded on the mobile plant inspection sheet files, located in the site office. Inspection of plant and equipment is undertaken daily to ensure appropriate safeguards are in place and to check for any faults.

In the event of a safety failure or suspected fault with an item of plant or equipment, the relevant person/s will ensure that the plant or equipment is shut off in a safe manner and not used until the equipment can be repaired or replaced.

Specialist equipment will be used for handling and/or transporting waste on and off site. A programme of planned maintenance and inspection will be scheduled for all plant on site to minimise the disruption to operations.

To prevent breakdown of equipment all items of plant and equipment will be maintained in accordance with the manufacturer's specification. All plant on site has a repair and maintenance agreement with its supplier.

Checks are undertaken daily, both pre- and post-shift and recorded on the Group Integrated Management System template GF06-06 (Daily Mobile Plant Checks), which are stored in the weighbridge. Any records of damage are reported to the site supervisor who is responsible for engaging with the manufacturer to organise a repair.

Site managers and supervisors will regularly inspect plant to ensure that operational safety systems are working correctly.

#### 2.8 Drainage

The entire operational area of the site benefits from impermeable surfacing. The site drainage plan, M8030501, details the entire drainage system for the site and should be used to identify specific drainage asset locations in the event of an incident.

All surface water run-off from external operational areas is collected via a series of drains.

There is a surface water drain channel which runs along the front of the transfer station shed, this collects surface water from the yard, rainwater from the shed roof and any potentially contaminated run off from the waste storage area in the shed and discharges through a brick manhole and connects to the exiting drainage by the wash bay.

The wash bay has existing drainage that discharges via the storm drain, through a 3-stage interceptor on the northern boundary of the site and runs through further drainage channels through the car park in front of the site offices which also collect further surface water runoff and eventually discharges into a combined drain on Brunel Road.

In the yard area in front of the external storage bays and across the yard, surface water run-off collects in drainage channels and runs south then west across the site before it is discharged off site to the combined drain on Brunel Road.

The external glass bay benefits from a sleeping policeman across the front of the bay to ensure any potential residues present on the glass are contained within the bay. This bay is cleaned regularly, and any potentially contaminated residue is disposed of to a suitably permitted facility.

Routine maintenance of gullies and interceptors takes place, details of which will be recorded in the site daily check sheet. Clearing and cleansing of the drainage system will be monitored and initiated as required to prevent any build up from occurring. Additional ad hoc cleaning can be undertaken if required.

# **3 SITE OPERATIONS**

# 3.1 Waste Activities

The Site operates as a general wastes transfer station, including receipt of asbestos wastes for transfer, and as a vehicle depot.

# 3.2 Waste Acceptance Procedure

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

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

In the waste shed, general waste will be tipped in designated area within the building and will be tipped away from the front of the bay or storage area where the waste will be subject to inspection and further assessment of suitability before acceptance.

Other wastes deposited in external storage areas will also be subject to further inspection, to identify compliance with the Permit and presence of unauthorised materials and any non-conforming materials will also be dealt with as above.

Once unloaded, the vehicle will access the outbound weighbridge and a new reading taken. Weighbridge tickets will be issued to drivers once both readings have been taken.

Further details regarding the waste acceptance procedure, including pre-acceptance, load inspections and waste storage are details in the site's Waste Acceptance Procedure, included at Appendix EMS2. In addition to this, the Standard Operating Procedure for Receiving Persistent Organic Pollutants (POPs) in Waste Upholstered Domestic Seating (WUDS) in Transfer Stations will be adhered to, to ensure this waste stream is stored and handled in accordance with the Environment Agency Guidance. These materials will not be processed on site.

As the site also handles asbestos wastes, the Waste Acceptance Procedure at Appendix EMS2 is supplemented by procedures for "Handling of asbestos waste at a Waste Transfer Station: Main Operational Features and Safe Systems of Work", Appendix EMS2A.

# 3.3 Non-conforming waste streams

No waste will be accepted at the site which does not comply with the conditions of the Permit. If incoming waste 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 waste material. If the more detailed description of the waste reveals that the waste type is not permitted, then the load will be rejected.

If the 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 an incidental amount of non-conforming waste is found within a conforming load, it will be isolated, removed and transferred to the non-conforming quarantine area (35-yard container located in the yard on an impermeable sealed surface), as shown on the Fire Prevention Plan drawing M8030401 where it will remain segregated until scheduled removal to an approved facility within 5 days.

Details of the rejected waste will be kept on site. This will include time and date, haulier and vehicle registration, customer, type of waste, and reason for rejection.

# 3.4 Waste Storage

Waste Stream	Storage Location / Containment	Dimensions (m) (L) X (W) X (H)	Storage Volume	Max storage time
General waste	Internal Bay (Waste transfer shed)	10 x 8 x 4	320m³	72 hours

General waste	Internal Bay (Waste transfer shed)	10 x 6 x 4	240m³	72 hours
Glass	External Bay	9 x 12 x 4	432m³	1 week
Mixed C&D	External Bay	9 x 9 x 4	324m³	72 hours
Scrap metal	External Bay	9 x 9 x 4	324m³	1 week
Mattresses	Enclosed container	-	40-yard container	10 days
Wood	Enclosed container	-	35-yard container	1 month
Plasterboard	Enclosed container	-	25-yard container	1 month
Bonded Asbestos	Enclosed container	-	40-yard container	3 months

# 3.5 Waste Management

All wastes are managed by regular stock rotation on site. Outbound loads are pre-booked based on the daily volumes of each waste stream on site.

Waste storage areas are managed to ensure waste residence time is kept to a minimum, and each waste storage area is cleared at least monthly to ensure that a full clean of the bay/shed can be undertaken as part of the site's on-going housekeeping.

# 4 ENVIRONMENTAL CONTROL, MONITORING AND REPORTING

# 4.1 Potentially polluting leaks and spillages

The Site plant and machinery oil and fuels are to be stored in compliance with the requirements of the Oil Storage Regulations. An oil storage checklist is required for each of the applicable storage containers. COSHH and Material Safety Data Sheets (MSDS) are to be held with the materials stored.

Leaks and spillages of potentially polluting liquids must be attended to immediately. They must be prevented from entering the surface water drainage system or being carried out of site on vehicle wheels, emergency spill kits are in key locations where the risk is considered. The applicable Emergency Plan is to be implemented. Spill kits are available including absorbent material and means to prevent further escapes or spillage. Stocks of absorbent granules are available, for minor leaks from vehicles.

The site has spill kits located in the transfer station shed, the canopy where the fuel tank is located, and workshop, so these are readily available should they be required. Any spillages will be cleared immediately in accordance with the site's Emergency Plan document and the appropriate remedial action taken are recorded electronically on a near miss/hazard form and this is entered onto the Incident Reporting System. The absorbents will then be placed in a suitable container in the Quarantine Area, prior to being taken to a suitably licenced site for disposal.

If a spillage occurs, the area is clearly marked, using a traffic cone(s) and/or a cordon. The source of the leak or spillage is identified to prevent any further spillage/leak.

Absorbent socks are placed strategically to contain the spill, with granules placed onto the affected area to absorb the liquid. The granules are left until they have reached their full absorption capacity at which they are removed and placed into a bag and stored within the Quarantine Area for non-conforming waste, ready for scheduled removal off site with the relevant documentation.

All spillages are recorded on the Daily Inspection Sheet and Site Diary. If a spillage is of substantial environmental significance, it will be reported to the Environment Agency.

A spillage is considered to have substantial environmental significance if the following occurs:

- The liquid is one of those specified previously.
- It has entered a drain or watercourse.
- If the volume of liquid is relatively large.

• The spillage has occurred on unmade ground.

# 4.2 Environmental Monitoring

There are no emission limits or associated monitoring requirements under Schedule 3 of the Environmental Permit.

#### 4.3 Environmental Reporting

There is no reporting requirement under Schedule 4 of the Environmental Permit.

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

- any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution;
- the breach of a limit specified in the permit; or
- any significant adverse environmental effects.

Any information provided in response to the above will be submitted to the Environment Agency by Schedule 5 Notification within the relevant time period specified.

# 4.4 Site Inspections and Maintenance

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 EMS 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.

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

Any major defects found during the daily site inspection which are likely to lead to a breach of permit conditions will be reported to the Environment Agency if it is likely to cause significant environmental pollution and 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.

# 4.5 Malfunction/breakdown leading to significant environmental impact

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 Environmental Permit conditions.

Any malfunctions or breakdowns which are likely to lead to a breach of permit conditions or significant environmental impact will be reported to the Environment Agency and 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.

### 4.6 Housekeeping

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

Housekeeping consists of:

- Litter picking, as required when identified during the site daily inspection.
- Mechanical sweeping of the entire site on a weekly basis, plus additional ad hoc cleaning when required.

Housekeeping will be carried out to prevent accumulations of older wastes that may give rise to generation of odour, which could cause a potential impact off site. In addition to this, once a month, each of the reception bays will be swept out whilst empty and a record kept in the site diary.

#### 4.7 Climate Change

Flooding as a result of elevated rainfall levels due to climate change is a widely reported impact of climate change, however given the site's location and proximity to water bodies, it is unlikely that flooding as a result of climate change will be an issue at this site. However, should increased flooding on site be experienced, additional adhoc tankering may be required to reduce the impact on the soakaway.

Increased average temperatures are a widely reported impact of climate change. Average temperatures are expected to continue to rise and therefore we may need to implement additional measures or monitoring during such periods, for example increasing the frequency of fly monitoring and treatment during periods of warmer weather in the summer and/or throughout the year, when temperatures are at an appropriate level to potentially cause an issue, ensuring any associated risk is managed effectively.

If current control measures are revised in response to elevated temperatures, this management will be revised accordingly, with operational procedures developed to support these changes.

#### 5 AMENITY CONTROL

Fugitive emissions include dust, mud and litter will be inspected daily and recorded on the site daily inspection forms with all actions and close out dates detailed.

Fugitive emissions will be controlled in accordance with the relevant site-specific management plans.

#### 5.1 Control of Mud and Debris

Good housekeeping practices are maintained at all times to ensure the site is kept in a clean and tidy condition and to avoid the transport of mud and other detritus on to the Public Highway. Vehicle access to the site is directly from the public highway, which is of tarmac construction. All surfaces within the site to access the waste transfer building and external waste storage bays, are constructed of hardstanding.

Regular inspection will be made of the access road and adjacent highway throughout the day, dependant on the weather conditions. Should this highlight any significant deposits of mud or debris, cleaning will be undertaken, using equipment specified in below.

In the event that debris is generated from within the site it will be controlled by standard site management procedures, i.e. visual identification through the daily site inspection carried out by a competent person as part of the company's management system. The clearing of the deposited material and monitoring and recording of the operational area will be carried out under instruction from the TCM, or in his absence, his nominated deputy and recorded in the management system documentation.

A contracted vacuum road sweeper or other suitable measures will be employed, as necessary, to maintain the cleanliness of the metalled site access road and the adjacent highways. Alternative methods may be introduced by the Site Manager as deemed appropriate.

In addition to this, the site benefits from a vehicle wash bay, and mobile plant on site is washed daily to reduce any presence of mud and debris. Therefore, the jet wash will be present and a vehicle ramp for wheel cleaning of vehicles prior to leaving site, if required.

# 5.2 Control and Monitoring of Dust

The potential for the facility to generate fugitive dust emissions will be controlled by the types and quantities of wastes accepted at the site in addition to their acceptance procedures. Wastes consisting solely or mainly of dusts, powders or loose fibres are not accepted at the site and Staff are given clear responsibility for visual monitoring for dust generation and record keeping. Asbestos wastes are double wrapped and stored in an enclosed, lockable container to minimise potential for release of asbestos fibres. Asbestos wastes are stored separately and are unloaded by hand to minimise potential for damage to packaging and release of asbestos fibres.

The site typically accepts and stores wastes which are unlikely to generate dust, with the exception of wood. If a particular waste stream proves to cause a nuisance from the release of dust, alternative methods for receipt of the waste will be arranged or the waste supplier will be notified that the waste is not acceptable at the facility.

Daily site checks are carried out by a competent person as part of the ISO14001 management system procedures on a rotational basis this ensures that the storage and treatment operations at the site with the potential to generate dust and cause dust build up are regularly reviewed to prevent dust becoming a nuisance and having an off-site impact. As part of the daily site check, dust is visually assessed and recorded on the Daily Site Inspection sheet (SD03-03) – See DEMP Appendix DEMP1.

Dust monitoring will be carried out to ensure that the site is not generating unacceptable concentrations due to the operations and to monitor particulate concentrations at the site perimeter. The monitoring will consist of visual monitoring of potentially problematic loads upon discharge. Should the results of the visual monitoring show that dust is being generated from the internal site roads and operational area, the affected areas will be sprayed with water and the speed of the vehicles reduced.

The waste delivery vehicles visiting the site are predominantly on the public highways and roads due to the nature of their work and as such the risk of dust being transported into site is very low.

To prevent the release of dust created by the operation of the site, operational areas will be cleaned with road sweepers at least weekly, or on a more frequent ad hoc basis as necessary. Any dust generated within the building will not cause a nuisance beyond the site boundary because the shed is fitted with a fixed rotary atomiser and the external storage bays are covered by a pacific nozzle line system that disperses mist water vapour for control of dust. In addition to the oscillating fan, the site is provided with equipment capable of suppressing dust caused by the operations by spraying with water.

Should significant volumes of fugitive dust, fibres and particulates be generated at site as a result of the acceptance of a particular waste, additional control measures below would be applied until the dust levels return to normal as visually assessed by a competent person.

Specific measures appropriate for individual circumstance will be deployed as necessary at the discretion of the site management from the following:

- Regular clearance of site surface and roadway of any standing material to minimise dust generation.
- Periodic sweeping of site surface and roadway with a mechanical road brush
- Damping down of the site surface
- Suspension of site operations responsible for release if conditions (wind strength and direction) combine to make dust control impossible.

#### 5.3 Litter Control

The overall risk presented by the escape of litter from the facility has been assessed as low due to the management of waste generating litter. All vehicles delivering waste to the site are required to be sheeted or contained if they have the potential to create windblown litter. Any escape of litter or spillage of wastes from the waste transfer building leading to the escape of fugitive materials will be carefully controlled throughout the working day.

Operations at the site will be conducted in a manner that minimises the incidence of wind-blown litter. General wastes which are typically lighter fractions are deposited loose within the transfer station shed, whereas the waste streams stored loose externally are heavier (wood, scrap metal, glass) and are therefore unlikely to generate litter. All other wastes are stored within containers, significantly reducing the potential for litter to arise. There is therefore minimal potential for litter arising from materials stored outside of the building.

In the event that there is an escape of litter from the confines of the site and into the local environment, it will be the responsibility of the TCM to arrange for litter picking of the affected areas within the working day. The operation or delivery generating the escape of litter will be stopped and thereafter controlled to minimise further releases and any container releasing fugitive materials will be covered or removed from site immediately.

An excessive spillage of materials anywhere within the site or on the adjacent highway will be dealt with immediately by mechanical or manual sweeping of the surface and litter picking if required. Details of such a spillage and actions taken will be recorded in the site diary.

The site benefits from litter netting over the fence around the operational area of the site. During daily perimeter fence inspections, members of staff retrieve any litter collecting on the fence. Litter that is blown from the operational area into adjoining parts of the site will be collected on a daily basis. Any litter that is blown or deposited outside of the boundaries of the site will be collected as soon as practicably possible.

# 5.4 Control of Pests, Birds and Scavengers

The site will be inspected regularly as part of the daily site inspection and the presence of any pests noted on the daily site inspection form (SD03-03) by the shift manager or competent person.

The operations of the site will ensure the minimisation or avoidance of flies and vermin at the site. The constant operations and rate of waste removal from the facility will minimise any potential for infestation. Housekeeping at the facility, including regular clearance of bays and debris and washing of surfaces will reduce potential for attraction of flies and pests to the Site.

In the event that flies or other such insects posing a nuisance are introduced to the site with incoming waste, insecticides offering rapid knockdown and long-term treatment will be used. Bird control measures may also be implemented to deter presence of birds.

Site staff will keep a day-to-day check for the presence of pests in operational areas of the site and any incidents will be reported to the Site Manager. Routine pest control measures are undertaken at the site by a third-party contractor who visits and inspects the site on a monthly basis. Records of these visits are maintained on site. In the event that evidence of pests or increased activity is noted, the contractor would be obliged to attend site, and appropriate methods will be implemented.

# 5.5 Control and monitoring of Noise and Vibrations

Noise and vibration are not perceived to be an issue at the site due to the nature of the operations. All operating plant and machinery are maintained in accordance with the manufacturer's recommendations. Mitigation of noise emissions from the site will also be achieved by ensure the site undertakes appropriate handling, deposit, treatment, and transfer of wastes.

If a complaint is received regarding noise generated from the site, the operations will be reviewed. This review will include the consideration of the operations, the timing of specific activities and the location of specific activities. Changes will be made as appropriate to reduce the potential for nuisance beyond the site boundary. The site's Complaints Procedure, outlined in section 6.2 below, will be followed for all noise complaints.

#### 5.6 Odour Control

The site will operate in accordance with the site's Odour Management Plan.

In order to prevent the release of unacceptable odours, malodorous wastes that could cause a potential nuisance beyond the confines of the site will not be accepted at the facility. Highly odorous loads detected on arrival at the weighbridge will be rejected and returned. Where highly offensive/odorous materials are detected subsequently, following receipt at the reception area within the building, these will similarly be returned if it is possible to segregate them and identify the producer and the delivery mode enables reloading, otherwise they will be prioritised for early processing, with appropriate measures in place to mitigate, and steps taken to notify the customer of the issue.

A high standard of operations will be maintained at all times in order to control any potential odour nuisance. Controls will comprise ensuring duration of storage of potentially odorous materials is limited, processing of wastes with odour potential indoors, use of odour suppressant sprays, housekeeping to ensure debris does not accumulate on site and that surfaces and equipment is kept clean, and odour monitoring is undertaken.

Stock rotation will be observed, to ensure removal of oldest material first. Odour control will be assisted by the turnaround of all general wastes within 72 hours, using the method of rotation of the reception bays. In the event that more odorous wastes are found in loads once deposited, these are dealt by rejection of the load if possible or being placed into the next batch to be removed from the Site.

The site supervisor/site operatives will conduct a daily check to assess the odour emissions from the site, by undertaking an olfactory assessment at set points around the site to establish whether any odours are present. The findings of these assessments will be recorded on the odour reporting form. The monitoring of odour generation and levels in general will be continuous throughout the daily operation of the facility by site staff.

Housekeeping will be carried out to prevent accumulations of older wastes that may give rise to generation of odour, as detailed in section 4.6. In the event that through the deposit of highly odorous waste contamination of operational surfaces has occurred, the appropriate areas will be washed down and if necessary, a further masking agent introduced.

An odour suppressant system is provided at the site, it comprises a fixed rotary atomiser in the waste transfer shed, and pacific nozzle line system that covers the waste transfer shed and external storage bays. The system disperses mist water vapour with deodoriser for control of odour. The system is fed by the mains water supply and is operated manually. This system will be used when odorous wastes have been received and/or are being processed, or where the results of site odour surveys have indicated that it may be necessary to control potential emissions.

If a complaint for an odour related issue is received, it will be recorded in the site diary and also entered onto the company compliance database. An investigation in line with company procedures will be undertaken and if the source of odour is found to originate from site it will be identified and, if possible, prioritised for removal.

#### 5.7 Control of fire

The site currently operates under a Fire Prevention Plan (FPP) (V2, May 2024). This document references the fire controls that the site currently has in place.

The site benefits from the following fire detection measures on site:

- CCTV
- Visual inspection
- Smoke detectors/fire alarms

All reasonable precautions will be taken to prevent the outbreak of fire leading to the likely release of fugitive emissions. The deposit of hot or burning waste will be treated as an emergency and dealt with immediately in accordance with the Operator's Accident Management Plan. The Fire Brigade and the Environment Agency will be advised by the Site Manager and the incident recorded in the Site Diary.

Any emergency or outbreak of fire will be regarded as a priority incident and immediate actions will be taken as described in the Accident Management Plan.

Firefighting equipment is available at locations throughout the site for use by suitably trained staff on minor fires if safe to do as per the Accident Management Plan. Scheduled maintenance and inspection shall be carried out on all firefighting materials and the site fire alarm system.

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

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 staff roll call
- Contact the Environment Agency
- Contact the Local Authority
- Supply Fire and Rescue Services with relevant documents located in the Gerda box, including fire risk assessment, drainage plan, waste types and volumes on site, site plan.

#### 6 REPORTING

#### 6.1 EA Reporting Mechanism

The Environment Agency shall be notified as soon as is practically possible either through a direct line to the local EA office, or using the national 24-hour line outside of normal office hours, following the detection of:

- any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution;
- the breach of a limit specified in the permit; or
- any significant adverse environmental effects.

#### 6.2 Complaints Procedure

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

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.

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.

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

#### 7 CONTINGENCIES

	Contingency Plan		
Waste Management	If the waste storage volumes on site are nearing the capacity of the site, the mass balance of waste will be reviewed, and the operational arrangements will be managed to ensure no exceedance of the sites waste storage capacity.		
	If the site is not able to operate under normal conditions due to unforeseen events, including but not limited to:		
	<ul> <li>Plant breakdowns</li> <li>Emergency and/or Environmental incidents</li> <li>Logistical issues</li> </ul>		
	The site contingency plan will be initiated. A summary of possible contingency options is detailed below:		
	<ul> <li>Reschedule delivery times/days for inbound waste</li> <li>Increase the number of outbound movements of waste</li> <li>Divert scheduled waste deliveries to other suitably permitted internal sites or authorised third-party sites</li> <li>Reduce waste activities</li> <li>Cease all waste activities</li> </ul>		
Vehicles, Plant and Equipment	In the event that vehicles, plant or machinery breakdown, the supplier will be contacted to investigate and repair the breakdown. On their arrival and initial assessment, a decision can then be made on further action:  • If the machine is expected to operational within 4 hours, additional stock level monitoring is required.  • If the machine is not expected to operational up to 8 hours, tipping may need to be suspended until the machine is operational.		

# If the machine is not expected to operational for more than 36 hours, an alternative machine will be sought from the supplier to allow operations to continue in the interim.

The Plant and Equipment Breakdown Action Plan will be implemented.

# Weighbridge

In the event of a failure of the weighbridge system the following actions will be taken:

- When a vehicle delivering waste arrives at the weighbridge, the weighbridge operator will inform the driver that the weighbridge system is not operational.
- If possible, computer printed tickets shall be generated manually entering estimated weights or those read from the weight indicators.
- If it is not possible to print tickets, the weighbridge operator will manually enter the following details on the manual weighbridge ticket:
  - Vehicle registration
  - Capacity of vehicle/container
  - Customer name and account number
  - Customer contract number
  - Date
  - Driver's name
  - Carriers registration number and name
  - Description of waste including appropriate code.
- The weighbridge operator will agree the gross weight with the vehicle driver. If available an historic tare weight is entered or the weight from the vehicles MOT plate and the net weight generated.

# Environmental Incidents

#### Fire:

Incidents involving fire will be dealt with in line with the FPP, Site Emergency Plan and Procedure for Evacuation. To minimise any environmental impact during a fire tipping will be stopped or reduced where possible. The fire will be isolated to prevent it spreading and if practical and safe to do so trained site staff will extinguish the fire, this will be the response to small scale manageable fires as a result of a dynamic risk assessment. In the event of a larger fire, the fire service will undertake active firefighting, with site staff taking instruction from the FRS officers during this time, allowing the FRS to take control of the incident.

#### Flooding:

Given the site's location and proximity to water bodies, it is unlikely that flooding as a result of climate change will be an issue at this site.

# **Chemical spills:**

Chemical, fuel and oil spills will be isolated and prevented from spreading using the spill kits on site, tipping in the immediate area will stop until the incident is cleared following the procedures in the Emergency plan, in conjunction with the spillage action plan.

# Problematic waste contamination:

Problematic waste contamination, including but not limited to radioactive waste and explosives are not permitted on site. The sites waste acceptance procedures are implemented for incoming loads and therefore these wastes may be identified during delivery and refused entry on to site, however, should these or similar waste streams be identified on site during unloading or processing the following contingency will be applied:

 All tipping will cease immediately, and the area will be evacuated, and the emergency/specialist service and the Environment Agency will be called. The site will take instruction from the relevant service.