FICHTNER
Consulting Engineers Limited

Viridor Tees Valley Limited

Tees Valley Energy Recovery Facility

Response to Schedule 5 Request, dated 16 December 2024

1 Fire Prevention Plan

1. **With specific reference to the proposed quarantine area, please confirm that it will be sized to ensure at least a 6m separation around quarantined waste from any buildings, or other combustible or flammable material in accordance with the FPP guidance. Please update the FPP accordingly.**

   Reason: You have stated in your FPP that 'it may not be possible to maintain a separation distance of 6m around the quarantined waste' and that 'when depositing waste in the quarantine area, the site operative will attempt to place the waste so that a reasonable separation distance is maintained around the waste and it does not lie directly adjacent to any walls'. This is not in accordance with section 12 of the FPP guidance, your quarantine area must be designed/sized to provide at least a 6m separation around quarantined waste from any buildings, or other combustible or flammable material.

   As stated in section 9.1 of the Fire Prevention Plan submitted with the application, the quarantine area will be designed to

   - hold at least 50% of the waste delivery load; and
   - have a separation distance of at least 6 metres, or alternative equivalent measure (such as a thick concrete wall between the bunker and the quarantine bay), around the quarantined waste.

   Appendix A.7 of the Fire Prevention Plan includes a drawing identifying an indicative location for the quarantine area. The quarantine area will be located within this area. Taking this into consideration, it is not considered necessary to update the Fire Prevention Plan submitted with the Application Pack.

2. **With specific reference to non-permitted waste temporarily stored in the quarantine area. Please confirm that this waste will be removed immediately in the event of a fire and update the FPP to detail how you will do this.**

   Reason: You have proposed to use the quarantine area for temporary storage of non-permitted waste, in this case the FPP guidance (section 12) requires the following:

   - *for non-permitted waste stored in the quarantine area 'in the event of a fire, you must remove it immediately. Your fire prevention plan must include details of the procedure you will use to do this'.*

Viridor can confirm that, in the event of a fire, non-permitted waste which is stored within the quarantine area will be removed as soon as practicable when it is safe to do so.

2 Containment

3. Please confirm if the containment systems for the hazardous liquids stored on site will be designed in accordance with CIRIA 736 Containment Systems for the prevention of pollution.

Reason: It is not clear in the application. Containment systems should be designed in accordance with CIRIA 736.

Whilst there is not an explicit requirement in the EPC Contract for the containment systems for the hazardous liquids stored on site will be designed in accordance with CIRIA 736, Viridor can confirm that the EPC Contact includes requirements for the following storage facilities:

1. Waste bunker

   To prevent the ingress of ground water or the seepage of leachate from the waste to ground, the bunker structure will be designed to achieve tightness class 2 for the base slab, all walls and piers up to the hopper floor level in accordance with the requirements of EN 1992-3: Design of concrete structures - Liquid retaining and containment structures.

2. Chemical store

   A chemicals store will be provided for the storage of oils and chemicals in drums and other containers.

   The chemicals store will have chemical resistant floors and walls which act as bunds.

   Bunds will be constructed in accordance with the requirements set out below.

3. Bunding

   All fluids and liquids stored in vessels which are capable of harming people or the environment, e.g. oils and chemicals, must be provided with an impermeable secondary containment (bund).

   Bund capacities will be a minimum of 110% of the vessel volume. If more than one vessel is located within the bund, the capacity of the bund will be 110% of the largest single vessel or 25% of the aggregate of the vessel volumes, whichever is the larger, except where the tanks are hydraulically linked in which case they will be treated as if they were a single tank.

   The bund will slope to a sump to allow the contents of the bund (or rainwater if outdoors) to be pumped out and required holding capacity maintained.

   Viridor will undertaken regular inspections of areas of secondary containment/bunding, and where required implement corrective actions to get the bunds emptied, to ensure that there is sufficient capacity to contain any spills/leaks from chemical/raw material storage facilities.

   A locally operated pump located in the bund sump will be provided to remove water (rainwater or firewater). The pump will discharge to an appropriate point within the Site's drainage system dependant on its composition.

Viridor considers that the requirements of the EPC Contract will enable it to ensure that all chemical containment facilities are designed to ensure the prevention of pollution. Viridor will implement a programme of maintenance and inspection of all containment facilities to ensure that they are fit-for-purpose throughout the lifetime of the Facility.

3 Noise Management Plan

4. **A noise management plan (NMP) which demonstrates Best Available Techniques to minimise operational sound emissions during weekday and weekend night periods. The NMP should include specifications for roof, walls, glazing, louvres and roller shutter doors.**

   Reason: Due to the BS 4142 impacts predicted by in the NIA (low to below adverse), additional mitigation measures were not considered to be necessary. This is based on the assumptions made in the NIA regarding sound source levels and the sound insulation performance for the external building envelope (roof and walls least Rw 23 dB), non-acoustic weather louvres, assumed to provide Rw 4 dB attenuation, standard roller shutter doors rated at least Rw 15 dB. AQMAU considers adverse impacts to be likely during the weekday and weekend night-time

   A Noise Management Plan is provided in Appendix A.

A Noise Management Plan

Intended for
Viridor Tees Valley Limited

Document type
Noise Management Plan

Date
February 2025

Noise Management Plan

Tees Valley Energy Recovery Facility

RAMBOLL Bright ideas. Sustainable change.

Noise Management Plan
Tees Valley Energy Recovery Facility

Project name	**Tees Valley Energy Recovery Facility**
Report no.	**1620010534-003-RAM-XX-XX-RP-AC-00001**
Recipient	**Viridor Tees Valley Limited**
Document type	**Noise Management Plan**
Version	**0.1**
Date	**20/02/2025**
Prepared by	**Jonathan Howson**
Checked by	**David Harbon**
Approved by	**Craig Barson**

Site Details

Site name:	**Tees Valley Energy Recovery Facility**
Site address:	**Former South Tees Eco Park, Eston Road, Grangetown Prairie, Middlesborough**
Operator name:	**Viridor Tees Valley Limited**
Permit number:	**EPR/AP3627SL/A001**

Who This Plan is For

Who should be made aware of this plan?	**Site Supervisors, Management Team**
How will they be made aware?	**Distribution of NMP by email, regular management meetings. Training for relevant staff as required to implement BAT**

Document Owner

Document author:	**Ramboll UK Limited**

List of Revisions

Revision number	Revision authorised by	Date submitted to Environment Agency	Revision owner
0.1 (DRAFT)	N/A	20 February 2025	N/A

Contents

Appendices

1. Introduction

This Noise Management Plan (NMP) relates to the operation of the Tees Valley Energy Recovery Facility (Tees Valley ERF) at the former South Tees Eco Park, Eston Road, Grangetown Prairie, Middlesborough (the site).

This NMP refers to the Noise Impact Assessment (NIA) that was prepared by Ramboll for the scheme (December 2021). The NIA was done before the facility was operational and therefore refers to predictions of noise emissions. At the time of writing this NMP the site is not yet operational and as such the NMP may need to be updated once commissioning noise measurements are done.

This NMP follows the form and headings of the Environmental Agency Noise Management Plan Template and sets out Best Available Techniques that the Operator will implement to minimise noise emissions and to minimise the likelihood of adverse impacts at off-site receptors.

1.1 Site description

The Tees Valley ERF site is located at the former South Tees Eco Park which is within the South Tees Development Corporation (STDC) area. To the north is the Middlesbrough to Redcar railway line, to the east are Lackenby steel works, to the south and west are industrial units. The site is accessed from Eston Road. The facility will incinerate waste and generate power for export to the grid. Heavy Goods Vehicles (HGVs) will import waste and export ash from the site.

The site is shown in Figure 1. A description of the operation of the facility is given in Section 3.3.

The main source of noise source currently affecting the area surrounding the site is road traffic on the A66 and intermittent vehicles on the local roads. There is also some industrial noise from the wider operations around the area.

The ERF will operate 24 hours per day 365 days per year, whilst waste deliveries via HGV will be 364 days per year (excluding Christmas day) predominantly between the hours of 07:00 and 20:00. It is expected that waste deliveries at the weekend will be reduced from the typical weekday numbers peaking around midday.

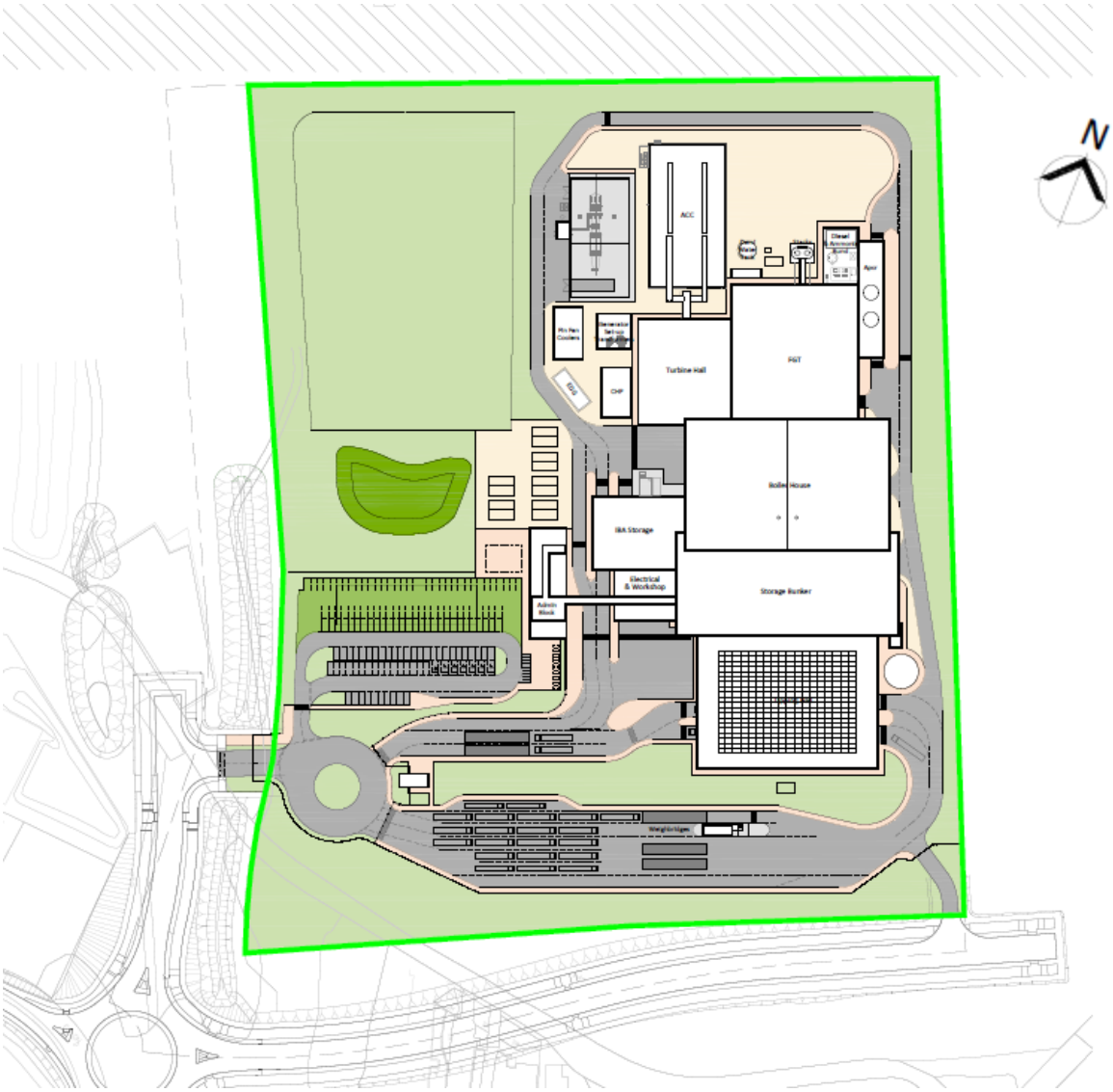

Figure 1 – Proposed site layout

1.2 Maintenance and review of the NMP

1.2.1 Who is responsible for the NMP and ensuring people are trained?

The Plant Manager and Technical Compliance Lead or other designated person who has been appropriately trained will be responsible for maintenance of the NMP and ensuring that staff are trained where required. This will ensure that the NMP is effectively implemented and that compliance is maintained.

1.2.2 Where is the plan stored?

The NMP will be stored electronically on the operators SharePoint site allowing free access to all staff.

1.2.3 State when the plan is reviewed.

This NMP should be reviewed on commissioning of the facility, then every 12 months or every time significant changes in plant or operation occurs, for example introduction of new plant items or operating duties of existing items, new vehicle routes, etc. The NMP should also be reviewed following any complaint relating to noise.

1.2.4 What training have the staff on site received in order to implement the NMP? How often are they trained?

Staff will be made aware of this NMP through site inductions and periodic briefings or toolbox talks (particularly H&S briefings). Any specialist training can be provided by an Acoustic Consultant to the Technical Compliance Lead or other designated person where required.

1.2.5 Who will maintain records of complaints and associated investigations due to noise on site?

The Technical Compliance Lead or other designated person who has been appropriately trained will maintain records of complaints and associated investigations due to noise.

1.2.6 Who is responsible for carrying out ongoing noise monitoring and acting on the results of this monitoring?

The Technical Compliance Lead or other designated person who has been appropriately trained, employing the services of an external Acoustic Consultant where required.

1.3 Relevant sector guidance on which this NMP is based

- British Standards Institute, British Standard BS 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound.
- Best Available Techniques (BAT) Reference Document for Waste Treatment – Industrial Emissions Directive 2010/75/EU, 2018
- Ramboll UK Ltd, Noise Impact Assessment Report, reference 1620010534-RAM-XX-XX-RP-EV-00004 dated 16/12/2021 (the 'Noise Impact Assessment').
- Fichtner Consulting Engineers Limited, Tees Valley Energy Recovery Facility - EP Application Supporting Information, revision R2 dated 25/06/2024.
- Environment Agency, Noise and vibration management: environmental permits, updated 31/01/2022.

1.3.1 Any other information you feel is relevant

Operational noise limits were set in the NIA for planning purposes based on background noise levels measured during a baseline survey. In accordance with BS 4142:2014+A1:2019 and as agreed through consultation with Redcar and Cleveland Borough Council, the rating noise level limit has been set equal to the representative background noise levels, allowing for any penalties for acoustic characteristics of the noise.

Table 1 details the significance of effects for operational noise used in the NIA (these are given here to provide context to the NIA summary). These are based on the numerical difference between predicted Rating Level and the prevailing Background Level at a receptor and the criteria from BS 4142:2014+A1:2019.

Description	Magnitude of impact	Adverse effect level
Predicted Rating Level is 10 dB or more below the prevailing Background Level at the receptor.	No Effect	-
Predicted Rating Level is between 10 dB and -0.1 dB below the prevailing Background Level at the receptor.	Negligible	NOAEL
Predicted Rating Level is between 0 dB and 4.9 dB above the prevailing Background Level at the receptor.	Low	LOAEL
Predicted Rating Level is between 5 dB and 9.9 dB above the prevailing Background Level at the receptor.	Medium	SOAEL
Predicted Rating Level is ≥10 dB or more above the prevailing Background Level at the receptor.	High	SOAEL

Table 1 - Operational Noise Significance Criteria from NIA

2. Receptors

The nearest noise sensitive receptors to the site are shown in Figure 2. These are as identified in the NIA.

2.1 Receptor list

Receptor reference	Land use	Direction from site	Approximate distance to site boundary (m)
Receptor 1	Residential dwellings along Jones Road	South-west	640 metres
Receptor 2	Residential dwellings along Bolckow Road	South-east	580 metres
Receptor 3	Residential dwellings along Bolckow Road/Cresswell Road	South-east	790 metres
Receptor 4	Non-residential receptors along John Boyle Road	West	125 metres

Table 2 – Nearest noise sensitive receptors

Figure 2 – Nearest sensitive receptors

3. Noise Sources and Processes

3.1 Noise impact assessment (NIA) conclusion

A noise assessment was done to support the planning application for the facility (the "NIA"). The assessment used predictions of noise emissions made using data from a similar Viridor facility and CadnaA noise modelling software. The model implemented the calculation methodology of ISO 9613-2:1996, as this was the current standard at the time of the assessment.

3.1.1 Measured Background Noise Levels

The NIA presented the results of a background noise survey done at positions representative of the nearest receptors between 22 and 26 January 2021. At this time the scheme had not been constructed. These levels therefore represent the pre-operational background conditions at the relevant receptors. Relevant background noise levels for each position are given in Table 3. Full data is presented in the NIA.

3.1.2 Mitigation

The following external envelope and inherent mitigation measures were assumed in the model:

- Typical external envelope (including roof) to be a composite cladding panel system (or equivalent) rated at least R_w 23 dB;
- Non-acoustic weather louvres, assumed to provide R_w 4 dB attenuation;
- The screen around the Air Cooled Condensers comprising a minimum density of 10kg/m^2. The noise from the condensers is modelled as emitting from just below the bottom of the screen to provide a worst case assessment; and

- Standard roller shutter doors rated at least R_w 15 dB.
- Attenuators fitted in the Stack to reduce noise emissions. A sound power of 89 dB L_{wA} is applied at the top of the Stack in the noise prediction model.

3.1.3 Predicted impact

A 3D computer noise model was prepared to calculate the plant and activity noise emissions from the proposed facility at each NSR.

Four key scenarios have been considered:

- Average hour 09:00-16:00 (the period of the day when most HGVs will occur, typically 20 two-way movements per hour).
- Peak hour 14:00-15:00.
- Night-time without HGVs 23:00-05:00.
- Night-time with HGVs 05:00-07:00.

The peak hour differs in terms of vehicle movements only – the operation of the facility itself is constant and operates 24/7.

In addition to this, additional scenarios have been considered for the operation of the Emergency Diesel Generator (EDG).

Rating levels ($L_{ar,T}$) are at the receptor façade location and do not include a façade reflection. The specific and rating noise levels are in terms of daytime 1-hour periods and night-time 15-minute periods.

The average weekday hour (09:00-16:00) noise model results are detailed in Table 3.

Receptor	**Storey/ Height**	**Background Level, $L_{A90,T}$ (dB)**		**Predicted Specific Noise Level, $L_{Aeq,T}$ (dB)**		**Resulting Rating Level, $L_{Ar,T}$ (dB)**		**Excess of rating level over background level (dB)**	
		Day time	Night-time	Day time	Night-time	Day time	Night-time	Day time	Night-time
R1	Ground floor/ 1.5m	36	32	36	36	36	36	0	4
R1	First floor/ 4.0m	38	34	37	36	37	36	-1	2
R2	Ground floor/ 1.5m	43	34	28	25	28	25	-15	-10

Receptor	Storey/ Height	Background Level, $L_{A90,T}$ (dB)		Predicted Specific Noise Level, $L_{Aeq,T}$ (dB)		Resulting Rating Level, $L_{Ar,T}$ (dB)		Excess of rating level over background level (dB)	
		Day time	Night-time	Day time	Night-time	Day time	Night-time	Day time	Night-time
R2	First floor/ 4.0m	46	35	32	26	32	26	-14	-9
R3	Ground floor/ 1.5m	47	42	28	24	28	24	-19	-18
R3	First floor/ 4.0m	49	42	29	25	29	25	-20	-17

Table 3 – Background noise levels and operational noise levels from NIA

For the average weekday hours of 09:00-16:00, the resultant effect levels are:

- NOEL
  - R2 ground and first floors
  - R3 ground and first floors
- NOAEL
  - R1 first floor
- LOAEL
  - R1 ground floor - $L_{A,r}$ +0dB over background

For the night-time hours of 23:00-05:00, the resultant effect levels are:

- NOEL
  - R2 ground floor
  - R3 ground and first floors
- NOAEL
  - R2 first floor
- LOAEL
  - R1 ground and first floors - $L_{A,r}$ up to +4dB over background

It should be noted that each scenario assumes that the FFCs are operating at maximum speed, i.e. the resulting sound pressure level is 85 dB L_{pA} at 1m. However, the sound pressure level will be 80 dB L_{pA} at 1m when operating at design speed.

For the FFCs operating at design speed, the R1 resultant effect levels are:

- NOAEL
  - R1 ground and first floors (09:00-16:00)
  - R1 first floor (23:00-05:00)
  - R1 first floor (05:00-07:00)
  - R1 ground and first floors (14:00-15:00)
- LOAEL

- R1 ground floor (23:00-05:00) – $L_{A,r}$ +1dB over background
- R1 ground floor (05:00-07:00) – $L_{A,r}$ +1dB over background

Therefore, for the FFCs operating at design duty, the resultant effect levels at R1 are NOAEL to LOAEL ($L_{A,r}$ +1 dB over background noise level). An exceedance of background noise level by +1dB is considered to be negligible as the background noise levels at receptor R1 are typically 22dB below ambient noise levels at LT1.

Peak hour and other scenarios

Calculated noise levels for peak hour are similar to those shown above for the Average hour and are not presented here.

Emergency Generator

The NIA concludes that:

The resultant effect levels for each scenario outlined in [Table 3] above are not expected to change with the Emergency Diesel Generator (EDG) operational. This is expected to be a rare event and would only be used for the safe shut down or start-up of the facility.

3.1.4 Overall conclusion

The NIA concludes that:

"…significant effects are not predicted due to operational noise from the facility."

3.1.5 Describe any important contextual points

The NIA was based on predictions of noise from the facility using data for a similar facility and library data. Measurements of the operational noise will need to be undertaken when the facility is operational.

Following the publication of the NIA, the calculation standard used in the modelling software (CadnaA) was updated to reflect the recent update to ISO 9613-2:2024. As a result the levels calculated by the software for the same model were higher than presented in the NIA.

In particular noise from the Fin Fan Coolers were identified as being louder than the NIA and therefore, reselections have been made and an acoustic barrier proposed around the coolers. These measures are subject to detailed design.

As a result the total noise emissions from the scheme, when calculated according to ISO 9613-2:2024 are expected to be similar to the noise levels are presented in the NIA, calculated under ISO 9613-2:1996, and the resultant noise levels would not significantly affect the conclusions of the NIA.

It should be noted that noise levels from the FFCs and the resultant impacts at the nearest receptors are expected to be lower when the FFCs are not operating at their maximum duty, as the wet bulb temperature will typically be lower than the maximum duty for much of the year.

3.1.6 State which sound sources on site are dominant at nearby receptors

The NIA identifies the Fin Fan Coolers as the most significant noise source which are predicted to lead to a small excess in the overall noise emissions over the background noise level at the nearest receptor.

Reselection of the fans and additional mitigation in the form of an acoustic barrier will be developed to further reduce noise from these fans. These measures are subject to detailed design and their specification will be carefully considered to reduce any adverse off-site impact.

3.2 Noise sources

The noise sources associated with the facility used in the NIA model are detailed in Table 4. The locations of these plant items are shown on Figure 3.

Ref.	Area/Plant Item	Noise level	Reference
1	Process Areas	85 dB L_{Aeq} reverberant level	Benchmarking measurements
2	Turbine Hall	85 dB L_{Aeq} reverberant level	Benchmarking measurements
3	Tipping Hall	80 dB L_{Aeq} reverberant level	Benchmarking measurements
4	Air Cooled Condensers (ACCs)	80 dB L_{wA} per m^2	Benchmarking measurements
5	Stacks	89 dB L_{wA} at the top of stacks	Assumed from previous schemes
6	Transformer	95 dB L_{wA} / 106 dB L_W	Assumed from previous schemes
7	Fin Fan Coolers (FFCs)	80 dB L_{pA} at 1m (design speed) / 85 dB L_{pA} at 1m (maximum speed)	Spectral noise data provided by EPC Contractor.
8	Emergency Diesel Generator (EDG)	85 dB L_{pA} at 1m from enclosure	Advised by EPC Contractor. Assumed generator noise spectrum adjusted to specified level.
9	On Site HGVs (lorries)	99 dB L_{wA} moving point sources	Benchmarking measurements at an operational ERF. The lorry was travelling at 9mph on site. Measurement taken at 1.5m above hard ground, and 5m from the lorry noise source.
10	Access Road HGVs (lorries)	106 dB L_{wA} moving point sources	Benchmarking measurements at an operational ERF. The lorry was travelling at an assumed speed of 30mph. Measurement taken at 1.5m above hard ground, and 5m from the lorry noise source.
11	Refuse Collection Vehicles (26 t)	107 dB L_{wA} moving point sources	BS 5228:2009+A1:2014 C11.16

Table 4 – Key noise sources and measured noise levels

Night-time HGV movements are understood to be confined to the hours of 05:00-07:00.

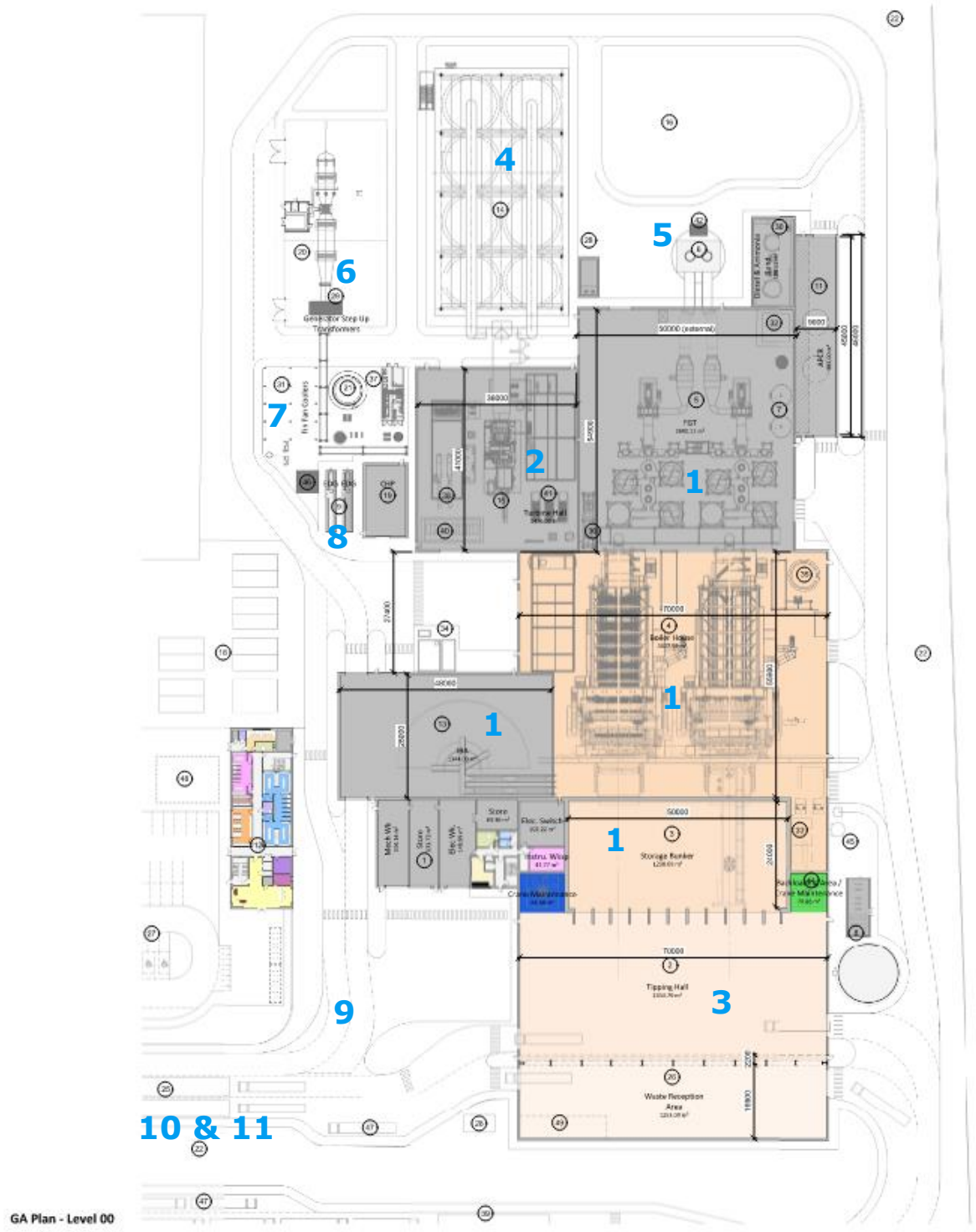

Figure 3 – Location of main noise sources/processes identified in Table 4

3.3 Overview of noise processes and emissions

An overview of activities and processes at the facility is presented below and is taken from the Supporting Information document provided for the Environmental Permit Application, produced by others. A fuller technical description of the facility is given in that document.

The main activities associated with the operation of the facility will be the combustion of waste to raise steam and the generation of electricity in a steam turbine/generator. This includes the following:

1. Incineration plant processing waste which is delivered to the facility from off-site via road
2. Generation of power for export to the National Grid
3. Inert bottom ash material transferred off-site for recovery/disposal
4. Air pollution control residue transferred off-site for recovery/disposal

The Facility includes two waste incineration lines, waste reception (or 'tipping hall'), waste bunker, turbine hall, air cooled condensers, boiler hall including boilers and FGT system, ash handling & storage facility, and an 80 m stack (see Figure 3).

An indicative process diagram for the waste incineration process is presented in Figure 4.

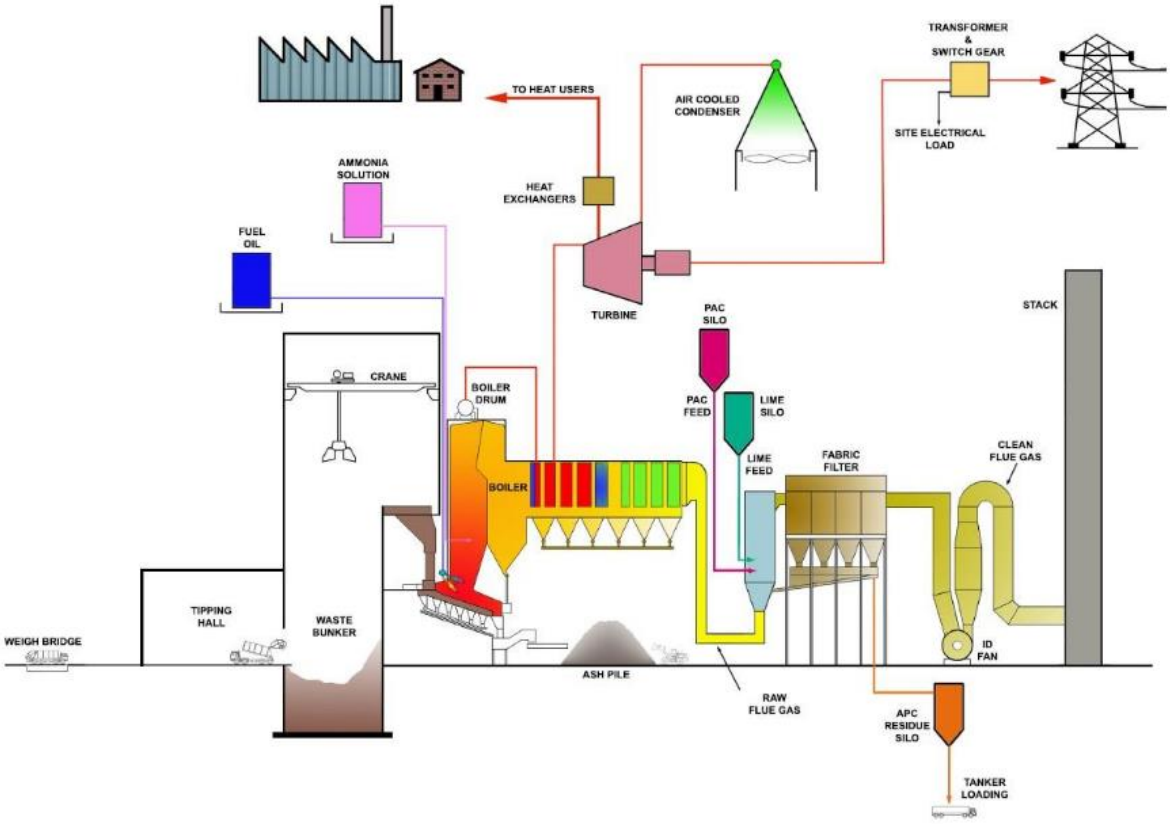

Figure 4 – Overview of operation

All incoming waste will be delivered to the facility by road. All consumables (lime, ammonia solution and activated carbon) will also be delivered by road. Once within the tipping hall, the

waste delivery vehicles will reverse into a vacant tipping bay and tip waste into the bunker. The tipping hall will incorporate up to 11 tipping bays and will be fitted with fast acting roller shutter doors which will be kept closed when waste deliveries are not occurring.

A shredder will be located adjacent to the waste bunker and will be used to break up larger/bulkier items which are unsuitable for loading into the feed hoppers/feeding chutes. It is expected that the shredder will operate up to 8 hours each day.

Waste will be stored within a dedicated waste bunker. The waste storage capacity of the bunker will be equal to approximately 7–8 days of waste processing capacity. However, allowing for extended periods of shutdown, the maximum amount of time that waste will be stored in the bunker is 4 weeks. A crane grab will transfer the waste from the bunker to the feed hoppers/feeding chutes.

Waste will be moved from the feed inlet through the furnaces to the ash discharge using moving grates. Primary combustion air will be drawn from the waste bunker area to maintain negative pressure in this area.

The combustion chamber will be provided with auxiliary burners, which will combust low sulphur fuel oil or heating gasoil. The auxiliary burners will raise the combustion chamber temperature to the required 850°C prior to the feeding of waste. The auxiliary burners will typically operate up to 16 hours during a start-up event and 2 hours during a shutdown event.

The heat released by the combustion of the waste will be recovered by means of steam boilers, which are integral to the furnaces and will produce (in combination with superheaters) high pressure superheated steam at approximately 430 – 440°C.

As the facility comprises a twin line system there will be two boilers working in parallel. The steam from the boilers will feed a high-efficiency steam turbine which will generate approximately 48.2 MWe. The site electrical (parasitic) load will be approximately 4.63 MWe, assuming no heat is exported, resulting in approximately 43.6 MWe of power available for export at the design point.

The remainder of the steam left after the turbine will be condensed back to water. A fraction of the steam will condense at the exhaust of the turbine in the form of wet steam. However, the majority will be condensed and cooled using an air-cooled condenser.

The Facility will be constructed as ‘CHP Ready’ and will have the capacity to export heat, subject to technical and economic feasibility. High-pressure steam could be extracted from the turbine and piped directly to heat users. Alternatively, low-pressure steam exiting the turbine would pass through an onsite heat exchanger to heat up water for use in a heat network. A number of potential heat users have been identified for the export of heat, however at this stage there are no formal contracts in place with potential heat users.

The flue gas will pass through a bag/fabric filter arrangement, which will remove the particulates, reaction products and unreacted reagent solids, then the cleaned flue gas will be discharged to atmosphere via an 80 m stack.

The ‘main’ residue produced by the facility will be bottom ash, which is the burnt-out residue from the combustion process. Boiler ash, the ash fraction that collects within a boiler, will mix with the bottom ash to form the residue known as Incinerator Bottom Ash (IBA).

The ash will be quenched with water and transferred, via inclined conveyor, to the ash storage area with approximately 7 days storage capacity. There will be regular collections of IBA from the IBA storage area for transfer off-site to a suitably licensed waste facility.

Ash will be transferred to vehicles for transfer off-site using a front-end loader. Ash handling will be undertaken within enclosed buildings.

One emergency diesel generator will be provided at the site to enable safe shut-down of the facility in the event of a loss in grid connection. The diesel generators would only be expected to operate for short-term periods (i.e. <50 hours per year) for testing purposes. It is expected that the diesel generator will have a capacity of around 3MWe.

The ERF itself will operate 24/7. Vehicle movements will vary according to the following:

- Peak daytime hour (with most HGV movements anticipated) 14:00-15:00.
- Night-time without HGVs 23:00-05:00.
- Night-time with HGVs 05:00-07:00.

4. Control Measures and Process Monitoring

4.1 Appropriate measures / Best Available Techniques (BAT)

Noise control measures to be incorporated into the design of the facility are set out in the Supporting Information document provided for the Environmental Permit Application (produced by others) and summarised below:

- The design layout and design measures have been considered to minimise the noise impacts associated with the design of the Facility.

- Most of the 'noisy' plant items at the Facility will be installed within the main building and equipped with appropriate noise insulation. The air-cooled condensers will be designed to reduce noise and tonal components.

- If steam bursting discs or pressure relief valves release externally to the building, they will be fitted with appropriate silencers.

- Doors to the building will be kept closed when not in use in order to minimise off-site noise impacts, with the doors to the tipping hall and turbine acoustically rated to appropriate levels.

- Doors to the tipping hall will be fast-acting roller shutter doors, which would close after a delivery vehicle has entered the tipping hall. On average, it is expected that the doors to the tipping hall would be open for less than 1 minute to allow a vehicle to enter the tipping hall.

- Vehicle movements at night will be limited where possible and vehicles will be fitted with non-tonal reversing alarms.

- A one-way system will be in place for HGVs and waste delivery vehicles will only reverse once inside the tipping hall.

- Regular maintenance of plant items will be undertaken in accordance with preventative maintenance procedures.
- Any mobile plant to be used on-site will be operated and maintained in accordance with the manufacturer's instructions, whilst complying with the latest standards including those on noise emissions.
- Mobile plant would be fitted with broadband noise type reversing alarms.
- The mobile plant is expected to operate mostly within the process buildings, which will provide some level of attenuation. As such, the operation of the mobile plant within the process buildings is not expected to provide a significant contribution to the noise impacts of the Facility.

General control measures and BAT are summarised below.

Activity which produces noise	Operational Hours	Control measures (Appropriate Measure / BAT)	Contribution to overall impact	Action taken if outside optimum process parameters
Process Areas /Turbine Hall	24 hours	External doors to spaces to remain closed at all times except briefly for access. Check that door seals operate efficiently, and door closes tightly on the seals. Seals should be fitted to any gaps around the perimeter or meeting stiles of the doors. Monitor condition of acoustic louvres. Avoid any oil or debris build-up on absorbent surfaces of louvre.	Low	Training required for staff and signage to encourage keeping the door closed. Maintenance of seals and louvres as required.
Fin Fan Coolers	24 hours	Monitor and maintain coolers in accordance with manufacturer's instructions and monitor any changes in noise and vibration characteristics which may indicate a maintenance issue. Reference can be made to the data presented in this report as a benchmark of current operation. Review any comments or complaints from neighbours that could relate to the coolers.	Medium	Investigate reasons for elevated noise levels. Provide further mitigation where required, which could include additional screening. The services of an acoustic consultant could be employed where necessary.
Air Cooled Condensers	24 hours. Higher duty possible during summer days	Monitor noise levels when unit is running at a high duty in summer. Use modes of operation that minimise noise where possible (e.g. running at a lower speed for longer) Review any comments or complaints from neighbours that could relate to the DAC.	Medium	Changes in operational behaviour may be required. If a persistent issue occurs, acoustic attenuation may be required local to the ACCs, where possible.
HGV movements or mobile plant	24 hours (fewer movements at night)	Control vehicle speeds on site routes and maintain signage. Include signage to restrict use of horns / reverse alarms at night.	Low	Determine whether speed limit is appropriate, and routes are being followed.

Activity which produces noise	Operational Hours	Control measures (Appropriate Measure / BAT)	Contribution to overall impact	Action taken if outside optimum process parameters
		Minimise the number of times tipping bay doors are open when loading/unloading.		Implement a one-way system around the site. Alter scheduling to limit the number of vehicle movements to times when residual noise levels are higher. Determine whether rules around horns/ reverse alarms have been followed.
General heating and ventilation plant	Continuous 24 hours (typically lower duty at night)	Monitor and maintain plant in accordance with manufacturer's instructions and monitor any changes in noise and vibration characteristics which may indicate a maintenance issue. Review any comments or complaints from neighbours that could relate to specific plant items.	Low	Check whether ventilation plant is running as designed. Fit additional attenuation as required.
New plant items	-	Review noise emissions from any proposed plant and design mitigation as necessary. Any new plant and buildings should be reviewed by an acoustic consultant to determine any mitigation requirements such that the cumulative noise emissions from the site are not adversely affected.	Low	Mitigation to be determined at the design stage.

Table 5 – Control measures & Best Available Techniques

Site staff will receive appropriate training to understand the Environmental Permit conditions and the Environmental Management System (EMS), including relevant management plans. The facility will be managed in line with the EMS, which will be reviewed regularly to keep it relevant and up to date.

4.2 On-site monitoring procedures

On-site monitoring procedures are presented below.

Initial Noise Measurements on Commissioning

Once the facility is commissioned and operating at steady state, noise measurements around the site will be done in order to compare noise emissions to the levels predicted in the NIA through modelling.

Note that it is unlikely to be possible to measure the specific noise level from the facility at the nearby receptors as the noise is predicted to be lower than the prevailing background noise level. Therefore, only measurements close to or inside the facility can be made.

If noise levels are elevated compared to the predicted levels, the reason for this should be investigated and any further mitigation requirements established.

The results of this noise monitoring must be recorded in this NMP to use as a reference for ongoing regular monitoring.

Periodic Noise Monitoring

Noise level checks will be carried out periodically in operational areas where high noise levels may be present and the results compared to the benchmarking measurements above. Early warnings of increasing noise levels should result in more regular monitoring and determination of requirements for any noise reduction or mitigation program.

Monitoring should be carried out by a suitably qualified acoustic consultant or a suitably trained member of staff using measurement equipment conforming to at least Class 2 under BS EN 61672-1:2013. The equipment should be calibrated before and after the measurements.

Should the measurements indicate that noise levels differ from those presented in this NMP, the likely cause of the increased levels should be investigated and the actions outlined in Table 5 carried out as required.

Note that increased noise levels on-site may not necessarily indicate an issue off-site as small increase may still be below the background noise level. Once initial benchmarking measurements have been made at commissioning of the facility, any increase on these on-site levels would in the first instance require an assessment of whether there is any material difference to the noise impact experienced off-site.

In addition, condition monitoring will be carried out as follows:

Description of procedure	Procedure	When will this be carried out?	Corrective action
Replace old/faulty equipment	Procure new equipment	As required when plant needs replacing	Replacement equipment to have sound levels equivalent to or lower than existing equipment
Check maintenance of noise barriers	Visual inspection of barriers and earth bunds for any holes or gaps.	Monthly	Repair barriers if holes or gaps are found
Monitor condition of plant	Monitor any changes in noise and vibration characteristics which may indicate a maintenance issue. Reference can be made to the measurements/calculations presented in this report as a benchmark of current operation.	Ongoing	Investigate reasons for elevated noise/vibration levels.

Table 6 – Monitoring procedures

4.3 Monitoring off-site sound levels

As noted above, it is not possible to measure noise from the operational facility off site as the predicted levels are typically lower than the prevailing background levels at the nearest receptors.

5. Complaints reporting

Viridor have an established complaints procedure for all ERF sites. Documents outlining the External Complaints Process and the Non-conformance and Complaints Procedure are given in Appendix 1. The process is summarised below.

5.1 Receiving Complaints

Complaints could be received in 4 ways:

- Via the Viridor Customer Feedback line on 0800 975 3029
- Verbally to the site via telephone or directly to a member of staff.
- Via email or letter direct to the ERF site.
- From a statutory authority (e.g. Environment Agency) either directly or forwarding a complaint from a member of the public.

5.2 Investigating Complaints

When a complaint is received relating to noise, the process given in Appendix 1 should be followed, summarised below:

- The Technical Compliance Lead or Plant Manager must be informed, and a record made of the details of the complaint including: name, address and contact details of complainant, details and nature of complaint including date and time, how the complaint was received (letter, telephone, verbally or via an inspection), initial actions already taken.

- The complaint will then be entered on to the Viridor Incident Management System and the site ERF Complaints Log and a person assigned to contact the complainant within 24 hours.

- An investigation into the complaint will be conducted by the Technical Compliance Lead (or assigned person) and an assessment made of the nature and extent of the problem, the remedial measures and preventative actions required (if any), and the expected duration of the problem.

- The complaint shall be investigated by on-site and off-site observations, having regard to this NMP. The NMP should be referred to for any specific procedures or actions relating to noise sources identified in the plan.

- Any site-specific procedure for noise measurement or noise monitoring required by the Environmental Permit or planning permission for the site shall then be implemented.

- Providing the complaint is considered justified and warranting further investigation the EA should be notified and remedial action taken to reduce noise levels.

- Following completion of the remedial works, noise levels should be monitored and any residual impact assessed.

- The NMP should be reviewed following complaints and updated if required.

Appendix 1

External Complaints Process and Non-conformance and Complaints Procedure

External Complaints Process EMI

1. PURPOSE

1.1. To define the steps required to ensure: that all enquiries and complaints received are dealt with in an effective and timely manner with clear feedback to those concerned

2. SCOPE

2.1. Applies to all Energy Recovery Facility (ERF) sites and applies to all appropriately trained persons listed as responsible and accountable below.

2.2. Applies to the acknowledgement, investigation, response and actions to be followed in event of a complaint being received. These may be received from The Environment Agency, Local Authority or members of the public amongst others.

3. ROLES AND RESPONSIBILITIES

ROLE	RESPONSIBILITY
ERF EHS Managers	This is the person(s) responsible for actually implementing (or doing) what the procedure states. Not to be confused with the procedure owner or approver. Responsible for implementing this procedure and ensuring that all appropriate investigative actions take place and are documented, and those actions also meets the requirements of the Viridor **Complaints** process summarised below: • The complaint is investigated to identify the cause and recorded on the company Incident Management system. • Preventative action must be taken which is documented. • Where complainant is identified and expects a response they must be contacted about the investigation and actions taken. • Where the complaint of query is likely to involve EA, HSE, emergency services, insurance company, media or other stakeholders the Director of External Affairs MUST be informed. • Complaints involving a location with a local authority contract must meet its contract requirements and timescales. • ALL complaints must be reported to relevant 'Heads of' roles and Directors and discussed at Site Management Meetings. • If the investigation indicates the complaint cannot be substantiated this must be clearly recorded as the result. Other responsibilities include investigating environmental complaints made against the site and maintaining a register of all environmental complaints and complaint referrals. They are also responsible for communicating with and reporting to The Environment Agency or Local Authority in response to any Environmental related enquiry or complaint unless otherwise instructed by senior managers.
ERF Managing Director	This is a single person who has the overall decision and who is accountable for this procedure.
ERF Managers / Operations Manager	These are all the people that have been involved in either the writing of the procedure or have been consulted. This should include the Responsible and Accountable. Alongside the EHS Manager, The Operations Manager and The Engineering & Maintenance Manager are responsible for the implementation of this procedure within their department and by their direct reports. They are also responsible for addressing

	enquiries and investigation complaints relevant to their department as directed by a senior manager.
Site Business Support Co-ordinator	The Site Business Support Co-ordinator (or similar role) is responsible for working with the EHS Manager to maintain the on-site register of all complaints and complaint referrals to enable the site to meet its contractual, legal and moral responsibilities.
ERF Managers, and all Site Staff	These are all the people that need to be informed or have a job to do once the procedure is issued. All ERF staff are responsible for engaging with and participating in the investigation for any complaints received or issues raised as requested to do so.

4. TERMS AND DEFINITIONS

TERM	DEFINITION
Enquiry	A question or request for information regarding the business of the company from an individual customer, group of customers, member of the public or other stakeholder.
Complaint	An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the Company or its staff affecting an individual customer, group of customers, member of the public or other stakeholder.
Feedback	Information or statements of opinion about the standard of service, actions or lack of action by the Company or its staff, such as a new service/product.

5. REFERENCES

5.1. All associated documents and references referred to in this document are highlighted in bold and underlined.

6. PROCEDURE

This process reflects the Viridor **Complaints** Procedure.

6.1. Viridor has an open-door policy and must be available for a visit by local interested parties at all times during the site opening hours, and at other times by prior arrangement, subject to H&S and Operational priorities.

6.2. Members of the media are not allowed onto company sites until advice has been sought from the Head of Corporate Communications or Communications team.

6.3. No company employee shall give a statement to the media or take part in any interview without permission from the Head of Corporate Communications.

6.4. If you are approached or contacted by a reporter, journalist or similar take their contact details and the nature of their enquiry or request and immediately inform the Head of Corporate Communications or communications team. Enquiries/Requests for Information received at site.

6.5. For any requests, questions or feedback raised by a third party regarding Viridor's environmental performance, compliance or operations the following must be recorded:

- Name, address and contact details of person/company
- Details of the request

- Details of the information provided at the time the request was made
- Why the information is required

6.5.1. For ALL requests relating to Environmental or Compliance information the request MUST be passed without delay to the Head of HSSA (Viridor), the Environment Manager (Energy) and the Head of Corporate Communications.

6.5.2. The Head of HSSA (Viridor), the Environment Manager (Energy) and the Head of Corporate Communications will assess the request and make an appropriate response within the appropriate timescale.

6.6. For any requests for Corporate Responsibility Policy, H&S Policy, legal documents (e.g. licence, environmental permit) or uncontrolled documents these should be dealt with locally or passed to the communications team.

6.7. Any requests by a regulatory body for information pertaining to any licence, permit or permission held by the company should be passed to the Head of HSSA or Environment Manager (Energy).

6.8. Any other types of request for information will be processed locally at the ERF site using the process outlined below (especially 6.14) and the following procedures:

- **Non-conformance and Complaints**
- **Visitors to Site**, Section 6.10.

6.9. ALL complaints received from any of the following third parties shall be recorded online on the Viridor Incident Management System within 24hrs of receipt by the EHS or Operations Manager or nominated responsible person (if received over a holiday break within 72hrs or as soon as practically possible after the event). They will also be entered onto a site Complaints Log to enable the site to meet contractual obligations.

Third Parties:

- External Customer (excluding negative responses to customer questionnaires)
- Potential Customer
- Statutory Authority (e.g. EA, HSE)
- Statutory Consultees (e.g. English Heritage)
- Member of general public – directly or through a statutory authority
- Internal Client

6.10. Complaints could be received in 4 ways:

- Via the Viridor Customer Feedback line on 0800 975 3029
- Verbally to the site via telephone or directly to a member of staff.
- Via email or letter direct to the ERF site.
- From a statutory authority (e.g. Environment Agency) either directly or forwarding a complaint from a member of the public.

6.11. For any complaint the following MUST be recorded:

- Name, address and contact details of complainant.
- Details and nature of complaint including date and time.

- How the complaint was received – letter, telephone, verbally or via an inspection.
- Initial actions already taken. Daytime Verbal/Email Statutory Body Complaints (0800 to 17:00)

6.12. During office hours statutory authority complaints are received by e-mail/telephone, other complaints may be received by any of the other means listed in 6.10. The EHS manager will instigate an investigation into the issue upon receipt of the complaint. In event of the EHS Manager being absent from site the Operations Manager will assume this responsibility. It is important that the individual receiving the complaint obtains the fullest information from the complainant so that it may be determined whether it is an isolated incident or a repetitive feature in the locality. For statutory complaints and others as required and having concluded the investigation the EHS Manager (or his/her nominated representative) will contact the Environment Agency with the results of the investigation. Night-time (17:00-08:00) or Weekend (Sat, Sun & BH) Statutory Body Complaints.

6.13. Out of office hours statutory nuisance complaints are received by Fax at the site and in the absence of senior management the Shift Team Leader on shift at the time of the complaint must respond to the fax. Section 6.14 details the required response to a fax from The Environment Agency. The fax complaint requires confirmation of any emergency incident occurring at the site due to a complaint The Environment Agency have received. Confirmation that the plant is running normally is to be provided in the response in addition to wind speed and direction at the time of complaint as detailed below.

6.14. Response to Faxed Complaint: With reference to the nuisance complaint no. xxxx received at XXXX ERF on the (provide date) there are no emergency incidents occurring on site (assuming not)

The Energy Recovery Facility is operating normally– if it is not running give the reason i.e. maintenance

The plant abatement systems are operating normally (assuming so) The wind direction at the time of complaint was xxxx with a wind speed of xxxx Name of person responding to fax and signature and time response completed and sent.

6.15. The duty Shift Team Leader will inform one of the following in order stated:

- EHS Manager
- Operations Manager

6.16. The complaint will then be entered on to the **Viridor Incident Management System** and the site ERF Complaints Log and a person assigned to contact the complainant within 24 hours between the hours of 09:00– 20:00 and in consultation with the complainant, complete section 1 of the **Environmental Complaint Report** Form.

6.17. An investigation will then be conducted by the EHS Manager (or a person assigned by them) into the complaint and Section 2 of **Environmental Complaint Report** Form will be completed. During the investigation of a nuisance complaint the investigator must firstly assess the cause of the incident, thereafter it is essential that an assessment is made of:

- The nature and extent of the problem
- The remedial measures and preventative actions required if any

- The expected duration of the problem

The results of the investigation will be uploaded into the **Viridor Incident Management System** database by the EHS Manager (or in their absence the Operations Manager). If required by site contract with a local authority the local authority must be informed within the contract specified time period (often 24hrs of receiving the complaint).

For any Noise related complaints any site-specific procedure for noise measurement or noise monitoring required by the Environmental Permit or planning permission for the site shall then be implemented.

6.18. The EHS Manager (or in their absence the Operations Manager) will respond, in writing, to the complainant detailing the results of the investigation.

6.19. Unofficial (Non-Statutory body) Verbal Complaint:

6.19.1. Any contact made to site directly by complainants will be recorded and details will be forwarded to the EHS Manager regarding the person who rang the site, the time the complaint was made and details of the complaint.

6.19.2. This information shall be used to complete section 1 of the of **Environmental Complaint Report** Form. It is important that the individual receiving the complaint obtains the fullest information from the complainant so that it may be determined whether it is an isolated incident or a repetitive feature in the locality.

6.19.3. The complaint will then be entered on to the **Viridor Incident Management System** database and the ERF Complaints Log and a person assigned to contact the complainant within 24 hours between the hours of 09:00– 20:00 and in consultation with the complainant.

6.19.4. The Investigation of this complaint will then proceed following exactly the same manner as those received via a statutory agency or authority detailed above in 6.17 and 6.18. If required by site contract with a local authority the local authority must be informed within the contract specified time period (often 24hrs of receiving the complaint).

6.19.5. For any Noise related complaints any site-specific procedure for noise measurement or noise monitoring required by the Environmental Permit or planning permission for the site shall then be implemented.

6.20. Written (Letter/Email) Complaint:

6.20.1. On receipt, written or e-mailed complaints, should be passed immediately to one of the following:

- EHS Manager Or in their absence:
- Operations Manager

6.20.2. The complaint will then be entered on to the **Viridor Incident Management System** database and the site Complaints Log and a person assigned to contact the complainant within 24 hours between the hours of 09:00– 20:00 and in consultation with the complainant, complete section 1 of the - **Environmental Complaint Report** Form.

6.20.3. The Investigation of this complaint will then proceed following exactly the same manner as those received via a statutory agency or authority detailed above in 6.17 and 6.18.

6.20.4. If required by site contract with a local authority the local authority must be informed within the contract specified time period (often 24hrs of receiving the complaint).

6.20.5. For any noise related complaints any site-specific procedure for noise measurement or noise monitoring required by the Environmental Permit or planning permission for the site shall then be implemented.

7. APPENDICES

APPENDIX A

N/a

Non-conformance and Complaints Procedure

1. PURPOSE

1.1. To ensure that when a non-conformance or complaint occurs that they are dealt with accordingly, recorded, investigated and actions taken (where applicable).

2. SCOPE

2.1. This applies to all non-conformities and complaints raised regarding Viridor Waste Limited and Viridor Resource Management's operational activities, Environmental, Health and Safety, Performance or the Quality of service/product provided.

3. ROLES AND RESPONSIBILITIES

ROLE	RESPONSIBILITY
Quality Management Systems lead SHEQS	To summarise Quality non-conformities including complaints, and presenting these at Management Review & SHEQS Monthly report To ensure the company policies and procedures are compliant with the requirements of relevant standards to which the Company is registered
SHEQS Manager	To summarise Health and Safety non-conformities including complaints, and presenting these at Management Review & SHEQS Monthly report
Environment Manager	To summarise Environmental non-conformities including complaints and presenting these at Management Review & SHEQS Monthly report
Quality, Risk and Compliance Manager (VRM)	To summarise complaints received regarding product quality complaints Viridor Resource Management (VRM)) and to communicate these the Quality Management Systems lead
Group Legal (& Communications where applicable)	To maintain and update where necessary, the **Register of Relevant Offences** To respond to complaints raised by members of the media
Responsible Manager (RM)	To process non-conformance issues raised concerning site operations To notify senior management of any complaints To review the effectiveness of correction and corrective actions
All Employees	To identify and notify the relevant persons, using the correct systems, any noncompliance issues found
Responsible Person	A person with the authority to implement correction and corrective actions

4. TERMS AND DEFINITIONS

TERM	DEFINITION

Non-conformance (Non-conformity)	Non fulfilment of a requirement, lack of adherence to a system, service requirement etc
Conformance	The fulfilment of a requirement
Root Cause Analysis	Refers to the practice of exploring all the possible factors associated with an incident or non-conformance by asking what happened, how it happened and why it happened, to provide the input for what can be done to prevent it from happening again
Correction action	Action taken to resolve the current occurrence of a detected non-conformance or complaint
Corrective action	Action to prevent recurrence of a detected non-conformance or complaint (following root cause analysis)
Viridor Incident Management System (VIMS)	Online reporting database to capture environmental complaints, Health and Safety complaints, accident and incidents
Incident Management System (IMS)	Online reporting database to capture non-conformances raised from internal and external audits
Polymer Complaints Register	Online reporting database to capture quality complaints and non-conformances specifically for Polymers.
Complaint	An expression of dissatisfaction, however made, that something is unsatisfactory or unacceptable
Management Review Meetings	Annual meeting of the senior management to discuss issues and outcomes. Any complaints should be recorded in this meeting.
Pressure Group	A group that tries to influence public policy in the interest of a particular cause
Responsible Manager (RM)	Term to describe the person(s) responsible for the delivery of this procedure from the relevant business function. This may include (but is not restricted to) Unit manager, Site manager, Operations manager, Engineering manager, Quality Manager etc.
Subcontractor	Subcontractor working/modifying or maintain the plant, haulage, storage, distribution, IT systems and external testing laboratories.

5. REFERENCES

5.1. All associated documents and references referred to in this document are highlighted in bold and underlined.

6. PROCEDURE

6.1. Non-conformities

6.1.1. Non-conformities may be raised as a result of the following (this list is not exhaustive):

- Internal or external audits
- Environment Agency (EA)/Scottish Environmental Protection Agency (SEPA)/Natural
- Resources Wales (NRW) inspections
- Health and Safety Executive (HSE) visit
- Local Authority inspections
- Regulator visits/inspections/audits

- Third party audits
- Site inspections / Visits
- Incidents, accidents and emergencies
- Complaints
- Non-compliant/rejected product or waste
- Incomplete paperwork (i.e. duty of care transfer notes)
- Load not delivered on time in full
- Product fails internal/external testing
- Contract reviews
- Operational activities
- Monitoring or regulatory requirements
- Vehicle Inspectorate
- Plant Defects that can affect the outcome of a process in terms of Health & Safety risks, environmental impacts or product or service provision
- Plan not operated/maintained according to the QMS
- Deficiencies relating to the operation of the Incident Management System (IMS)
- Failure to establish and achieve objectives
- Failure to periodically evaluate compliance with legal requirements
- Failure to comply with legal or client requirements
- Management review meeting outputs.

6.1.2. Recording of Non-conformities

- Non-compliant issues (including quality of service complaints) will be recorded either via electronic IMS or alternative designated locations such as the Polymers Complaints Register.
- Internal and external audit findings (non-conformities) will be recorded on the Incident Management System (IMS) according to the **Internal and External Auditing** procedure
- Environmental and Health and Safety non-conformities, complaints, and incidents should be recorded on VIMS according to the **Health, Safety, Security and Environmental Incident Reporting** procedure.

6.1.3. Addressing a Non-Conformance

- When a non-conformity is raised, Correction Action(s) will be undertaken (if applicable) to eliminate the cause of the detected non-conformance
- Root cause analysis will be undertaken to identify why the non-conformance arose and where applicable to determine any Corrective Action(s) required, to prevent the recurrence of the non-conformance
- Details of the Root Cause, Correction and Corrective actions where applicable will be recorded, as well as evidence uploaded to show actions undertaken in the relevant online database, see 6.1.2.

6.1.4. Close out of non-conformance actions

- All actions should be assigned a “Responsible Person” to ensure they are implemented
- When actions have been taken to close out a non-conformance, evidence must be uploaded to the relevant online database (IMS, VIMS, Polymer Complaint Register etc.)

- Corrective Action(s) may require changes to existing procedures and related documents or the introduction of new ones in accordance with the **Documented Information Control** procedure
- Corrective Action(s) may require changes in the working practice to prevent the noncompliance from reoccurring
- Corrective Action(s) may also require changes to the process or equipment to prevent the noncompliance from reoccurring.
- If corrective actions require additional training, arrangements for this should be carried out by the RM, referring to company training programmes as necessary.

6.1.5. Review

- The SHEQS teams may perform data and trend analysis to identify target areas for improvement projects.
- The RM shall review the effectiveness of the correction and corrective actions.

6.1.6. All applicable enforcement actions will also be reported to Group Legal and be recorded on a **Register of Relevant Offences**. The register will be kept on the HUB and will be reviewed and updated where required by Group Legal.

6.2. Complaints

6.2.1. For all complaints it must be ensured that:

- The Relevant Manager is notified
- The complaints are dealt with and resolved in a timely manner
- When the complaint involves a customer all efforts must be made to minimise the impact on the customer and Viridor
- They are recorded on the relevant system
- Investigate the complaint to determine root cause
- The actions needed are implemented promptly (where applicable)
- The company provides a consistent approach across the business.

6.2.2. The following information where applicable MUST be recorded (as a minimum) on the appropriate database:

- Name, address and contact details of the complainant (where available/applicable)
- Details and nature of the complaint including location, date and time
- Whether the complaint was received via email, letter, telephone, verbally or inspection
- Initial actions taken.

6.2.3. Media/ Pressure Group complaints shall be handled in accordance with the **Health, Safety, Security and Environment Incident Reporting** procedure.

6.2.4. Environmental or Health and Safety complaints received shall be recorded on the online Viridor Incident Management System (VIMS) as outlined in the **Health, Safety, Security and Environmental Incident Reporting** procedure.

6.2.5. Quality of product/service complaints from customers/clients shall be recorded on the Polymer Complaint Register.

6.2.6. For all complaints, the RM or an identified responsible person (must be someone who has authority to implement correction and corrective action) shall ensure the following are completed or carried out:

- The complaint is investigated to identify the cause, if necessary, this may involve direct communication with the complainant
- Action taken as described in 6.1.3. These actions must be documented in the appropriate online database
- Where the identity of the complainant is established, and the complainant has every expectation of a response, the complainant MUST be contacted and given information on the investigations conducted and actions taken as appropriate
- Where a complaint or query is likely to involve a statutory authority, such as the EA, SEPA, NRW, HSE, the emergency services, an insurance company, the media or other stakeholders, Group Legal MUST be informed.
- Once a complaint has been investigated and a third party is suspected to be at fault, Group Legal must be informed and must provide Viridor's response to the third party.
- When a complaint is likely to involve costs, fines, product recalls, loss of product or production at a third party or breach of contract the relevant site's General Manager must be informed.
- Complaints involving a location with Local Authority Contracts will also be reported in line with specific Contract requirements and timescales
- If the investigation indicates that the complaint cannot be substantiated, this must be clearly recorded with relevant database with supporting evidence.

6.2.7. Where appropriate, the RM will provide a summary of complaints raised to the relevant senior management (See Roles and Responsibilities table above) for reporting to senior management (where applicable).

6.2.8. Where required by environmental permit or contract, a site may develop a site-specific procedure covering complaints, however this is subject to approval by the SHEQS team to ensure it aligns with the Viridor procedure.

7. APPENDICES

APPENDIX A

None