Wards of London Properties Limited

Waste Transfer and Treatment Facility Collett Way, Southall

Operational Plan (OP)

Document Ref: 233305/OP/Rev A

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AA Environmental Limited
Units 4 to 8 Cholswell Court
Shippon
Abingdon
OX13 6HX
T 01235 536042
F 01235 532849
info@aae-ltd.co.uk
www.aae-ltd.co.uk

Control Sheet

Operator (Registered Office)

Wards of London Properties Ltd
2nd Floor Gadd House,
Arcadia Avenue, London,
England, N3 2JU

Site Address

Land off Collett Way,
Southall, London
UB2 4SE

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Prepared by

AA Environmental Limited (Registered Office)
Units 4 to 8 Cholswell Court
Shippon
Abingdon
OX13 6HX

T 01235 536 042
F 01235 523 849
E info@aae-ltd.co.uk
W www.aae-ltd.co.uk

Company No. 8474322

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1.0 INTRODUCTION

Overview

1.1 This Operational Plan (OP) describes the operation of the site, in line with the standards of the Environment Agency (EA) and activities within EA Guidance[1] and Sector Guidance[2]. The site is a transfer station located off Collett Way, Southall UB2 4SE. The site location and permit boundary are presented in drawings 233305/D/001 and 233305/D/002. The site receptors are presented in drawing 233305/D/003.

1.2 The Operator is Wards of London Properties Limited. The site operates under a bespoke permit for a household, commercial and industrial (HCI) material recycling facility.

1.3 The waste management operations, and limits to operations to be carried out at the site are shown in Schedule 1. Permitted waste types are shown in Schedule 2. Waste cannot be permitted if they consist of solely loose fibres, dust or powders and liquids.

1.4 The annual maximum amount of waste to be accepted at the site is 150,000 tonnes. Half of the exported waste will be by rail, and half will be by road vehicles.

1.5 The site operations involve treatment, processing and storage of mixed inert and non-hazardous waste streams for onward recovery, in addition to the storage of asbestos. Waste arises predominantly from household and commercial and industrial activities. Treatment includes manual sorting, separation, screening, baling, shredding, crushing or compaction of non-hazardous waste into different components for disposal or recovery. There is no treatment of asbestos with a storage constraint of ≤ 10 tonnes.

Working Hours

1.6 The site will operate in accordance with the hours detailed in the planning consent. The facility will operate 24/7 as shown below in Table 1.1.

Table 1.1 Operating Hours

Days	Hours
Monday to Sunday	24/7

1.7 The main processing hours will be between 07:00hrs to 20:00hrs, with night operations consisting of loading only by railway.

2.0 MANAGEMENT

Management

2.1 The site will be operated in accordance with the Operator's site-specific Environmental Management System (EMS).

2.2 The site will have specific management plans including, but not limited to, the following:

- Operational Plan (this document);
- Accident Management Plan (Appendix B);
- Fire Prevention Plan;
- Dust Emissions and Management plan;

[1] Environment Agency website, *Control and monitor emissions for your environmental permit* page, (accessed May 2022): https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit

[2] IPPC (2013). *Guidance for the Recovery and Disposal of Hazardous and Non-Hazardous Waste* S5.06 and Non-hazardous and inert waste: appropriate measures for permitted facilities (July 2021)

- Spill Response Plan (Appendix C);
- Complaints procedure (Appendix D); and
- Site and Equipment Maintenance Plan

2.3 These plans and other site procedures set out the following:

- Control of operations on the environment;
- Register of Environmental Effects;
- Monitoring of emissions;
- Management of Staff Competence & Training (Roles and Responsibilities);
- Training of all staff on EMP
- Record Keeping;
- Inspections (Daily Record and includes TCM presence);
- Policies;
- Review process of the EMS; and
- Site Closure arrangements.

Staffing

2.4 All staff and operatives have clearly defined roles and responsibilities with specified skills for each post required.

2.5 At all times there will be sufficient staff to manage and operate activities on the site without causing a risk to the environment. Staff employed at the site on a typical shift may include:

- Materials Engineer and Technically Competent Manager (TCM) or delegate;
- Plant operative; and
- Site Manager.

2.6 In accordance with Environment Agency guidance the site will be supervised by the TCM, in addition to at least one member of staff who is fully conversant with the requirements of the Permit and Operational Plan regarding, in particular, the following:

- Waste acceptance and control procedures;
- Operational controls and environmental monitoring;
- Maintenance;
- Record-keeping;
- Accident/incident action plans; and
- Notifications to the Environment Agency.

2.7 The TCM will be on site for greater than 20% of the operation of the facility.

2.8 Technical staff will demonstrate continuing competence by passing periodic assessment. Personal training records will be kept, to provide evidence.

2.9 All contractors will be trained about the relevant working controls and legal responsibilities relating to their areas of works.

2.10 The Site Manager will only permit for works to be undertaken once relevant legal requirements and a site-specific risk assessment has been completed.

3.0 WASTE MANAGEMENT OPERATIONS

Operations and activities

3.1 The site is a Materials Recycling Facility with a main building, an office, a welfare block, weighbridges, and staff parking. The existing railway sidings in the north and south will be used to transport waste to and from the site, in addition to road vehicles. A gantry crane will be installed over the railway sidings to transport the waste.

3.2 Typical waste operation activities of the site will consist of the non-hazardous commercial/industrial waste processing and treatment. Treatment includes manual sorting, separation, screening, baling, shredding, crushing or compaction of non-hazardous waste into different components for disposal or recovery. All waste receipt and processing will be undertaken within the building. The process is shown in Schematic 1 and 2. The waste operations can be divided into two areas as below:

- **Waste Treatment Building** is located in the centre of the site and houses, all waste treatment and processing activities are within the building. There is fixed processing plant located within the building. Activities which will be undertaken include waste acceptance, manual and mechanical segregation, separation, screening, crushing, shredding, baling and storage. The segregation, separation and screening will largely be through a trommel system, fed by an excavator.
- **The external area** will be limited to storage of specified waste, storage of non-hazardous waste within a secure container, and haulage.

3.3 All receipt or treatment of non-hazardous waste will be carried out within the waste treatment building. All treatment of specified and other waste will be carried out within a building as the site is within an AQMA area for NO_2 and PM_{10}. There will be no external processing or treatment of waste.

3.4 Incoming waste and specified waste streams are received and deposited within the waste treatment building as shown on drawing 233305/D/004a. Waste will be deposited within the feedstock / tipping area. The waste is predominantly treated via a picking station and fixed trommel in Unit 1 via sorting, separation, screening or crushing. Shredding and baling will also operate using mobile plant, at a frequency in line with demand. The internal waste treatment building site layout is shown in drawing 233305/D/004b.

3.5 A flow chart for the waste operation activities is provided in Schematic 1 and 2.

Waste acceptance control systems and procedures

3.6 Prior to accepting any waste, all waste producers will be notified of acceptable and unacceptable wastes to be received at the site. The site will only receive those wastes specified in Schedule 2.

3.7 Waste entering the site is visually inspected at the weighbridge and associated duty of care paperwork checked; including details of the waste carrier registration, completion of signatures and dates. Drivers are instructed by staff where to unload the contents of the delivery. All waste unloaded at the site will be within the feedstock / tipping area as shown in drawing 233305/D/004b.

3.8 The Waste Transfer Note, or Hazardous Consignment note for permitted asbestos waste, will be taken from the carrier, checked to ensure it is fully completed with the correct data and the material conforms to the pre-acceptance information. If the Operative is satisfied, the Carrier will be directed to the relevant processing area. Vehicular unloading will be supervised by a trained operative. During unloading of the waste, the w will be further inspected to check its contents are consistent with the description provided on the Duty of Care note. If there is any uncertainty regarding the waste type against the expected description as set out in the pre-acceptance information and/or Duty of Care note, the material and/or the vehicle will be isolated/quarantined until the assessment can be concluded. Rejected loads will be recorded in the Site Diary. An example site diary proforma is provided in Appendix F.

3.9 For each delivery, the site foreman will ensure the Waste Transfer Note, or Hazardous Consignment Note, is properly filled in and signed off, and will record details of the waste delivery which includes at least the following:

- Date and time of delivery;
- Vehicle details (registration mark);
- Written description, EWC code, origin and quantity of the waste;
- Waste producer details; and
- Waste transfer note number

3.10 A final check is undertaken on the waste during unloading to determine if there is any non-conforming waste intermingled. No incoming waste will be deposited or stored outside unless within secure containers.

3.11 Wastes are continuously visually inspected by personnel working within the operational area during waste processing. If it is noticed that loads contain non-conforming wastes before unloading takes place, the driver is told not to unload and to report to the Site Manager to receive further instructions. Any wrongly described waste subsequently identified will be recorded in the Site Diary and advice sought from the TCM and/or Environment Agency, if appropriate.

Waste rejection and quarantine procedures

3.12 In the event that potentially unacceptable waste is identified during operation it is segregated and taken to the Quarantine Area along the southern boundary of the site (shown on drawing 233305/D/004a). Unacceptability includes, but is not limited to, significant odour and smouldering wastes. If necessary, further testing will be undertaken to determine acceptability. The testing will be undertaken by the Operation Manager or delegate.

3.13 In the event of non-conforming material is identified, the Producer will be notified and if deemed necessary the importation of the waste stream will be stopped until acceptability can be confirmed.

3.14 In the event that the waste is unacceptable, the Producer will be notified to remove the material from site. The details of this incident will be recorded in the Site Diary. In the event that a vehicle cannot be immediately turned away (due to the time of day, for example), it will be placed adjacent to the Quarantined Area until practicable to be removed from site.

3.15 The site will retain copies of the Waste Transfer Notes for all rejected loads for no less than 2 years (or 5 years for hazardous waste).

3.16 In the event the Quarantine Area is used, the following controls will be implemented:

Table 3.1 Quarantine Controls

Waste Type	Waste Processing Controls	Storage Controls
Containers with dangerous substances, (e.g. diesels, oils and paints) within waste.	Waste treatment to stop in vicinity of the container to be isolated. Container and associated product removed and characteristics assessed.	Placed in secure skip with lid. Once classification complete the waste is to be removed from the site for offsite disposal or recovery.
Asbestos (if identified in waste streams other than EWC 17 06 01 and 17 06 05)	Waste treatment to stop in vicinity of the identified waste and area isolated.	Suspected asbestos containing material is double bagged and placed in the asbestos storage area/skip. Transferred in enclosed skip for disposal at appropriately licensed waste facility.

Table 3.1 Quarantine Controls		
Waste Type	**Waste Processing Controls**	**Storage Controls**
Large pressurized containers (e.g. gas cylinders).	Container transferred to Quarantine Area.	Storage in cage. Onward transfer for recovery.
Small pressurized containers	Container transferred to Quarantine Area.	Storage in cage with lid. Condition of cylinders to be regularly checked. Onward transfer for recovery.
Hazardous wood (creosote treated products, copper chrome arsenate (CCA) treated railway sleepers, telegraph poles or fence panels and packaging and pallets marked with 'MB' will have been treated with Methyl Bromide)	Potentially hazardous wood segregated out and dealt with in accordance with RPS 250.	Placed in secure skip with lid. Once classification complete the waste is to be removed from the site for offsite disposal or recovery. If hazardous, it is transferred off site as 17 02 04*.

3.17 All quarantined wastes will typically be removed once suitably bulked up and will be stored on site appropriately.

Waste dispatch procedures

3.18 All waste dispatched from the site will be supported by a Waste Transfer Note in accordance with the requirements of the Permit and Duty of Care Requirements. The operator will follow guidance presented in Section 34 of the Environmental Protection Act 1990 'Waste Management: The Duty of Care – A Code of Practice'. The site procedures are as follows:

- Wastes sent for onward treatment will be segregated from residual waste;
- A full assessment of characteristics will be undertaken, in accordance with Waste Classification Technical Guidance WM3, prior to dispatch;
- The waste will be given described and documented in a waste transfer note recording its type (including a European Waste Catalogue code), physical form, tonnage and/or volume and how it will be contained during transport;
- The waste will be loaded into a vehicle with suitable containment and sheeted;
- Loading of bulk waste onto dispatch vehicles will only be within the waste processing building under a misting system or underneath the gantry for loading onto trains; and
- Wards of London Properties Ltd will maintain records of the transfer for two years for inert/non-hazardous waste and five years for hazardous waste.

3.19 All waste transferred off site for further recovery will be transferred with the descriptions provided in Table 3.2.

Table 3.2 Management of Waste from Processing Activities		
Type	**Storage requirements**	**Transfer**
Metals	Temporary storage beneath picking line or in a secure container externally.	Transfer for onward recovery. Transfer as EWC 19 12 02 or 19 12 03.
Plastics	Temporary storage beneath picking line or in a secure container externally.	Transfer for onward recovery. Transfer as EWC 19 12 04.

Table 3.2 Management of Waste from Processing Activities		
Type	**Storage requirements**	**Transfer**
Timber	Temporary storage beneath picking line or in a secure container externally.	Transfer for onward recovery. Transfer as EWC 19 12 07. This is on the basis of a suitable WM3 assessment. In the event under the RPS 250, transfer as 19 12 06* and 19 12 07 (providing a % of each).
Residual waste + RDF	Temporary storage beneath picking line, or concrete storage bays in the waste treatment buidling, or in a secure container within building or externally.	Transferred as EWC 19 12 12 or 19 12 11* (if deemed hazardous following a WM3 assessment).
Inert hardcore aggregate	Temporary storage at end of picking line. or external storage bay.	Transferred as 19 12 09, 19 12 12 or 19 12 11* (as applicable following a WM3 assessment)
Mineral / soils	Temporary storage beneath trommel, within a sealed container or covered external storage bay.	Transferred as 19 12 09, 19 12 12 or 19 12 11* (as applicable following a WM3 assessment)
Asbestos	Stored in a secure, locked and secure container located externally	Transferred under the applicable EWC code for onward disposal- likely to be EWC 17 06 01* or 17 06 05*

Waste quantity measurement systems

3.20 The weight of material received and dispatched will be recorded on the weighbridge.

3.21 The location of the weighbridge is shown on drawing number 233305/D/004a. The weighbridge will be maintained in line with the manufacturer's specification. This includes inspecting and testing to ensure the correct weight is being recorded to within 0.01 tonnes. Weekly checks will be undertaken to ensure that waste is not accumulating under or in the structure. Any significant accumulated waste will be removed.

3.22 Any malfunction or damage to the weighbridges will be recorded in the site diary and repaired immediately.

Waste storage

3.23 Non-hazardous waste streams must be stored within the building, or within a secure container externally. Specified waste may be stored internally or externally within designated concrete bays.

3.24 All asbestos waste will be double bagged and stored within a designated and clearly identified, secure and lockable, secure asbestos container in the external area. The maximum amount of asbestos waste stored at the site must not exceed 10 tonnes.

Waste quantity measurement systems

3.25 The volume of material received and dispatched will be recorded on Waste Transfer Notes and Hazardous Consignment Notes as waste enters and exits the facility. The is a weighbridge upon entry and exit of the site.

Housekeeping

3.26 As determined necessary through the inspection regime, excessive accumulation of soil, mud and dust on areas of concrete surfacing and haulage roads will be scrapped by machine or manually cleared.

3.27 The site will be inspected daily for evidence of litter, with litter picking undertaken as necessary. A housekeeping checklist has been provided in Appendix E.

Storage over shutdown periods and security

3.28 Loaded vehicles are turned away when the area is not operational. In the event that a vehicle cannot be turned away, it will be placed adjacent to the quarantined section.

4.0 POLLUTION PREVENTION AND CONTROL

Overview

4.1 All waste is processed within the building, which is surfaced with impermeable concrete. Following processing, non-hazardous waste is either stored within the building, in concrete storage bays or containers, or externally in secure and covered containers. Asbestos will be stored externally in a labeled and secure container. Inert wastes may be stored externally in a secure container.

4.2 The processing operational area will be fully capped by impermeable concrete surfacing as shown in the drainage and utility plan (reference 233305/D/005). The detailed drainage design is subject to approval at planning. The drainage will implement rainwater harvesting techniques and sub-surface attenuation to control the site's surface water. There will be a silt trap, petrol interceptor and a penstock valve. Any overflow, not used for dust/fire suppression, will discharge to the south east into the Thames Water network. Any connections and consent to be discussed with Thames Water. The rainwater tank will provide a minimum of 50 m^3 of grey water for on-site use.

4.3 No processing or handling operations of bulk non-hazardous waste is undertaken externally. Suitable wastes maybe stored externally and asbestos waste is also received and stored externally in a labelled, secure container as detailed in Table 3.2. Handling of asbestos and access to the container will only be undertaken when the dedicated local dust suppression system is in operation.

4.4 The impermeable concrete within the waste treatment building will ensure that there is no vertical seepage of surface water. All bulk wastes will be under cover and will have no connectivity with clean rainfall runoff. Kerbing of 150 mm and concrete walls around the perimeter of the site are secure to the concrete surface to provide an effective hydraulic barrier. The access point is raised to ensure that all water falls back towards the centre of the site and that any firewater is stored within the site boundary, as detailed in the Fire Prevention Plan.

4.5 The concrete surface within the building and wider site will be inspected for condition, with attention to secure joints between concrete sections. The inspection will occur once the surfacing has been cleaned by road sweeper. The surfacing inspection, and any maintenance regime, will be documented in the daily Site Diary inspection records.

Potentially polluting leaks and spillages from vehicles and fixed tanks

4.6 The operator maintains its vehicles, plant and equipment in accordance with relevant legislation. This ensures the manufacturers' schedules are followed and ensures the vehicles, plant and equipment is fit for purpose. The operator trains and authorises its staff to operate the vehicles, plant and equipment to uphold the above.

4.7 Plant and machinery are re-fueled via the onsite fuel tank on a daily basis. Plant Operatives are trained in pollution prevention techniques. COSHH materials will be stored in an appropriate storage container. The site supervisor ensures only authorised and trained staff carry out activities involving the re-fueling of plant or associated maintenance.

4.8 The maintenance schedule and inspections of the fuel tank and infrastructure by the site manager are recorded in the Site Diary.

4.9 Leaks and spillages from operational equipment and plant on site are controlled by the application

of good housekeeping techniques and regular documented maintenance of all plant and equipment. In the event of spillages or leaks a supply of absorbent granules/pads and fines-type materials generated from the operations at site is kept and will be applied to the area to prevent potentially polluting materials from potentially entering the surface water system.

4.10 In the event of a significant spillage, the Environment Agency will be notified of the spillage event as soon as possible. All significant spillages and leaks will be recorded in the Site Diary.

5.0 SITE INFRASTRUCTURE

Provision of site identification board

5.1 A site identification board will be located at the entrance to the facility.

5.2 The site identification board is inspected weekly by the site supervisor to ensure it is clearly legible from the site boundary and free from damage or vandalism. The site manager will record all inspections in the Site Diary.

5.3 The site identification board provides the following information:

- Site name and address;
- Permit holder's name;
- Operator name;
- Environmental Permit reference number;
- Emergency contact name and telephone number;
- Confirmation that the site is permitted by the Environment Agency;
- The Environment Agency's telephone number (03708 506 506); and
- The days and hours of operation.

5.4 The site identification board will be constructed from durable materials and maintained in a clearly legible condition throughout the entire duration of operations at the site.

Vehicle guidance

5.5 The site utilises a banksman to ensure traffic management is kept free flowing through the one access /egress.

5.6 A trained operative (banksman) will direct internal traffic and vehicles. The site will implement a radio communication system between the banksman, key site staff, and plant operatives to ensure effective on-site traffic management and ensure all receipt, bulking and treatment of waste occurs within the building, under dust suppression.

Site security, fencing and gates

5.7 There are two access points to the site; one is for road traffic in the east (via Collett Way), and the other is for rail traffic in the south. The entrances will be secured and staffed 24 hours, with access monitored in and out of the site at all times. There is access for Network Rail haulage as shown on drawing 233305/D/004a which also accesses the site from the south east via Collett Way, but also to/from the north.

5.8 The entire perimeter of the site will be protected by hoarding or fencing. The integrity of the fencing and gates will be inspected on a weekly basis. Any damage or defects that reduce security at the site will be temporarily repaired as soon as practicably possible and permanently repaired within seven days. Damage to the site fencing and gates will be recorded in the Site Diary, along with any required repairs.

5.9 The site and security staff are instructed that in the event of finding evidence of unauthorised access and/or vandalism, the matter must be reported to the Police and the Site Manager who

will then take the appropriate action.

Lighting

5.10 Security lights are provided within the building and in the external yard area. Lights are positioned to face inward and are angled to minimise light spillage. Use of lights is minimized during non-operational periods to reduce resource use, whilst providing safe means of access for site operational and security staff.

5.11 All lights will be regularly inspected with all faults being repaired as and when necessary. All repairs will be recorded in the Site Diary.

Water Usage

5.12 Water will be used on site for the dust suppression sprinklers, water bowsers and small scale washing down activities. Some of the water will come from the on-site storage tanks which hold 50 m^3 of roof runoff. The water source for the site is mains supply, sub-surface attenuation tank and rainwater harvesting tanks. The site is looking to promote rainwater harvesting and water minimization techniques to combat potential impacts of climate change and water scarcity in the region.

6.0 ENVIRONMENTAL CONTROL AND MONITORING

Management of dust and particulate emissions

6.1 Details on the control of dust and particulate emissions are detailed in the site specific Dust and Emissions Management Plan (document reference 233305/DEMP). The risk of dust and particulate emissions is assessed to be low when mitigation measures are adhered to.

Management of mud

6.2 The dispersal of dirt and mud originating at the site onto public roads and the surrounding land will be controlled. The following operational procedures will be implemented to ensure that dirt and mud do not reach the public highways and surrounding land:

- The whole of site will be capped with concrete impermeable concrete surfacing; and
- Plant and machinery will be thoroughly cleaned before leaving the site
- Mechanical sweeper to be deployed to remediate any mud and debris that has been deposited on to the public highway or internal concrete surfacing.

6.3 The Manager or nominated deputy will regularly inspect the entrance area for evidence of mud and debris that has been trafficked.

Management of odours

6.4 Non-conforming and odorous wastes will not be accepted at the site. The operator will monitor, control and minimise the emission of odours from the site to prevent releases in such quantities or concentrations that are likely to cause pollution of the environment or harm to human health or serious detriment to the amenity of the locale.

6.5 In the unlikely event that numerous complaints (≥ 5 substantiated complaints from separate receptors) are received within one week or less, operations will be ceased temporarily until the issue is discussed and resolved by taking appropriate measures.

6.6 It is considered that the types, nature and quantity of waste permitted to be accepted at the site present a low risk of excessive odour generation by the operation of the facility. The site is an existing facility with no known history of odour complaints.

6.7 Strong odorous waste streams are not accepted at the site and will be rejected at the site entrance during inspection against the Duty of Care paperwork. Waste Transfer Notes for the rejected material will be completed by the site manager and returned to the producer. In the event that a particularly odorous waste is accepted it will be isolated and subject to processing to remove the organic content as soon as practicable. The organic material will be removed from site in accordance with the site dispatch procedure.

6.8 The prevailing wind is from the south-western direction. Sniff test monitoring will be undertaken (as set out in H4 Odour Management Guidance) around the entire site boundary, as required, or in the event of odour being reported from the operational staff or receiving a complaint. The monitoring will be undertaken by the TCM. Monitoring will be recorded in the Site Diary.

6.9 In the unlikely event of significant odour being detected, the following controls will be implemented:

- the source of odour (i.e down to the relevant producing site if possible) will be determined and the producer notified. No further waste will be accepted for the relevant producing site until the matter has been suitably resolved;
- the odorous waste received will be segregated and transferred to a sealable container, if practicable. The waste will be disposed of in accordance with the waste regulatory regime;
- the misting system used for dust suppression will be adapted to apply a neutralizing agent over any affected wastes.

6.10 If notified by the Environment Agency that the site activities are giving rise to odour pollution outside the site, the operator will produce an Odour Management Plan.

Management of surface water and drainage

6.11 The site will be fully capped by impermeable concrete surfacing as shown in the drainage and utility plan (reference 233305/D/005). The detailed drainage design is subject to approval at planning. The drainage will implement rainwater harvesting techniques and sub-surface attenuation to control the site's surface water. There will be a silt trap, petrol interceptor and a penstock valve. Any overflow, not used for dust/fire suppression, will discharge to the south east into the Thames Water network. Any connections and consent to be discussed with Thames Water.

6.12 The concrete surfacing, within the waste treatment building and over main operational areas, will be inspected at least every two months to ensure that the system is working satisfactorily and that levels of suspended solids are suitably controlled. Records will be made of the inspections in the site diary. The interceptor will be cleaned as required.

6.13 The inspection of the yard surfacing will include inspection of concrete condition, any secure joints between concrete slabs. The inspection will occur once the surfacing has been cleaned by road sweeper. The site surfacing inspection, and any maintenance regime, will be documented in the daily Site Diary inspection records.

Management of fire prevention and control

6.14 Details on the control of fire prevention and control are detailed in the site specific Fire Prevention Plan (document reference 233305/FPP). The risk of fire is assessed to be low when mitigation measures are adhered to.

Management of noise

6.15 The site is set within a predominantly industrial setting. There is an industrial/commercial business park to the east, and a railway line directly north, south and railway depot to the north west. The nearest sensitive to noise receptors are the residential properties, circa 100 m north which are shielded by the railway line. The site will be operational 24/7 with core operations between 7 am and 8 pm; and loading only outside of these hours. The operations have been subject to a noise impact assessment and are approved under the Planning Permission.

6.16 All processing and mechanical operations for waste treatment will be undertaken within the building and works will adhere to the working hours.

6.17 All equipment, plant and vehicles used on the site will be maintained such that no excessive noise is produced as part of site operations.

6.18 A record of any complaints arising regarding noise emissions and the actions taken will be kept in the Site Diary.

6.19 If notified by the Environment Agency that the site activities are giving rise to noise (or vibration) pollution outside the site, the operator will produce a Noise and Vibration Management Plan.

Management for control and remediation of leaks and spillages

6.20 This can be found in the Accident Prevention and Management Plan (Appendix B).

Management of pest infestations

6.21 Non-conforming and odorous wastes will not be accepted at the site. Wastes with a high organic content will be removed from site as soon as practicable. The site supervisor will visually monitor for pests throughout the working day.

6.22 In the very unlikely event pests are identified, the Operator will employ a third party contractor to manage pest controls around the site. These are maintained on a recommended basis by the third party contractor. The attendance of the contractor will be recorded in the Site Diary.

Management of litter

6.23 The overall risk presented by the escape of litter from the facility is assessed to be low. All loaded vehicles entering or exiting the site will be sheeted to prevent litter being released outside the site boundary.

6.24 It will be the responsibility of the site staff to constantly monitor the site for signs of escaping materials either from the building or from vehicles delivering or removing materials to and from the site, particularly during periods of dry and windy weather.

6.25 The operator will retrieve litter that escapes the site immediately it is detected or notified to them.

6.26 Any escaping material adhering to perimeter fencing will be swept/picked up on an ongoing basis. Particular emphasis will be placed on ensuring that fugitive material is not allowed to escape from the site area.

6.27 A final inspection around the site at the end of the working day and removal of any litter or fugitive material from the perimeter fences, access road and operational area will be part of the site staff's daily routine.

6.28 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 site staff 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 material will be covered or removed from site immediately.

6.29 Records of inspections or remedial actions will be made in the Site Diary.

6.30 An excessive spillage of materials anywhere within the site or on the adjacent highway will be dealt with immediately by sweeping of the surface and litter picking if required. Such a spillage and the action taken will be recorded in the Site Diary.

7.0 SITE RECORDS

Security and Availability of Records

7.1 All records required by the Permit will be held by the operator.

7.2 The operator keeps all records relating to the site at the company registered office (2nd Floor Gadd House, Arcadia Avenue, London, England, N3 2JU) and / or on the site office.

7.3 The Site Diary is maintained at the site office.

Records of waste movements

7.4 The operator recognises the Duty of Care requirements of the Permit. The operator will adhere to Section 34 of the *Environmental Protection Act 1990 'Waste Management: The Duty of Care – A Code of Practice'.*

7.5 Details of the waste arriving at site will be recorded at the site entrance and site office. Relevant Duty of Care information will be recorded into the database. Details of dispatch will similarly be recorded in accordance with Sections 4 of this Operational Plan; including where the waste is being transported and whether it is being recovered, recycled or disposed of. Quarterly waste returns will be completed and submitted to the Environment Agency in accordance with the Permit requirements.

Records

7.6 All records required by the Permit will be held by the Operator. The operator will keep all records relating to the site at the main office.

7.7 The site diary/environmental log will be maintained by the site management. All records relating to the site will be kept for a minimum of 2 years. The following significant events will be recorded in the site diary:

- Maintenance of plant in accordance with manufacturer's recommendations;
- Breakdowns;
- Emergencies;
- Problems with material quality and action taken;
- Site inspections and consequent actions carried out by the operator. These include those undertaken by specialists;
- Technically competent management attendance at site;
- Any monitoring undertaken;
- Importation volumes and Duty of Care paperwork;
- Severe weather conditions which adversely affected site activities;
- Complaints (See complaints form and procedure in Appendix D); and
- Environmental problems and remedial actions (including spills and leaks).

Inspection Regime

7.8 Site inspections will be undertaken on operational days to check for unforeseen emissions and compliance with the Permit requirements. Inspections and corrective actions (including any required notifications to the EA) will be recorded in the Site diary. The main points for inspection will include the following:

- Cleanliness;
- Site emissions;
- Leakages/spillages;
- Monitoring data;
- Plant condition; and

- Integrity of wider associated buildings, surfaces, drainage and security provisions (where applicable).

7.9 In the event that a problem is identified, the Manager will organise immediate repair or other appropriate remedial action.

Availability of Permit and Management Plan

7.10 A copy of the Permit, all management plans and the supporting documents, will be kept available on site. It must be available for reference when required by all site staff carrying out work under the requirements of the Permit.

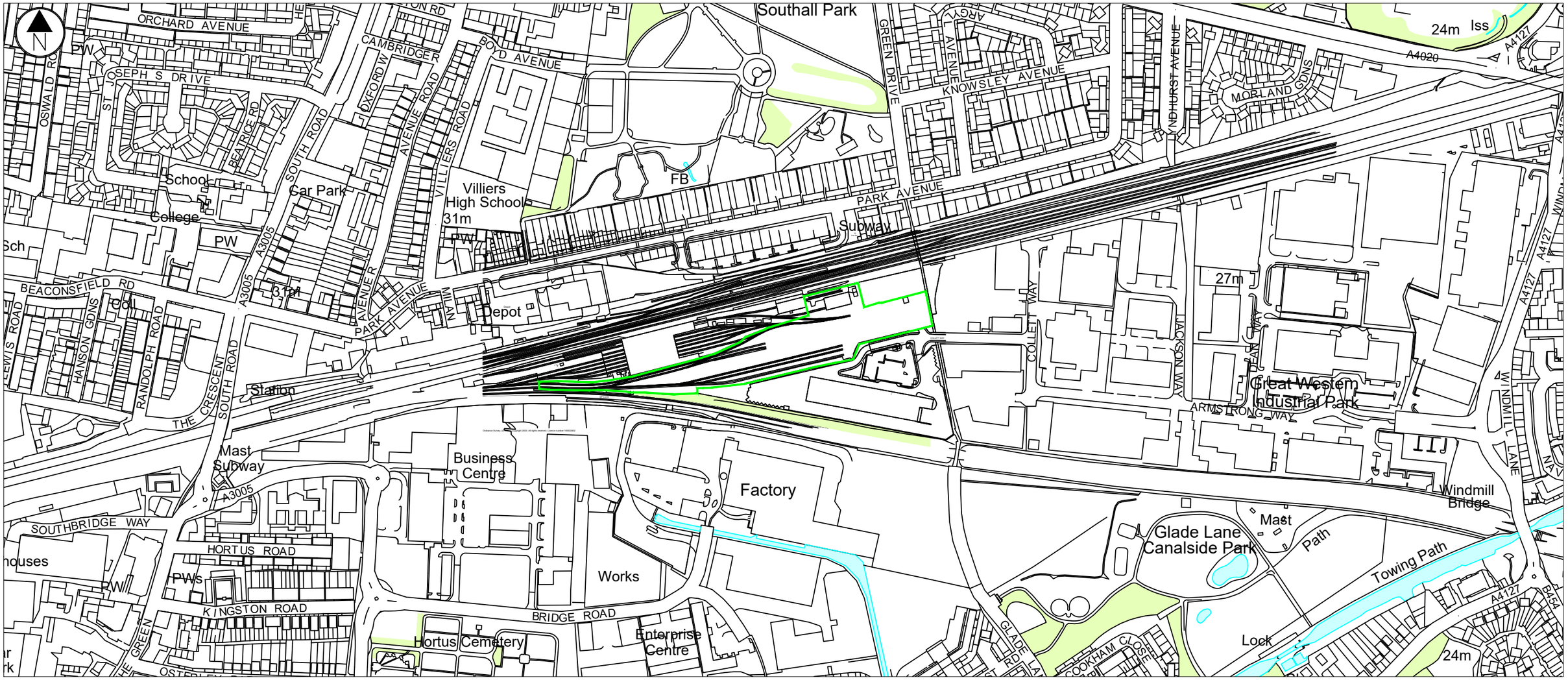
Review of Management Systems

7.11 The management systems will be reviewed and updated following any of the following:

- If any changes to the site, operations or equipment which affect the activities covered by the permit;
- If the permit is varied;
- Following any accident, complaint or breach of permit;
- If a new environmental problem or issue is identified and new control measures are required.

7.12 All records of changes to the management system will be recorded.

Drawings



KEY

Permit Boundary

The centre of the site is located at Grid Reference No. TQ 13581 79887

Rev.	Details	Drawn / Chkd.	Date

Project

233305
Land off Collett Way
Southall, London
UB2 4SE

Title

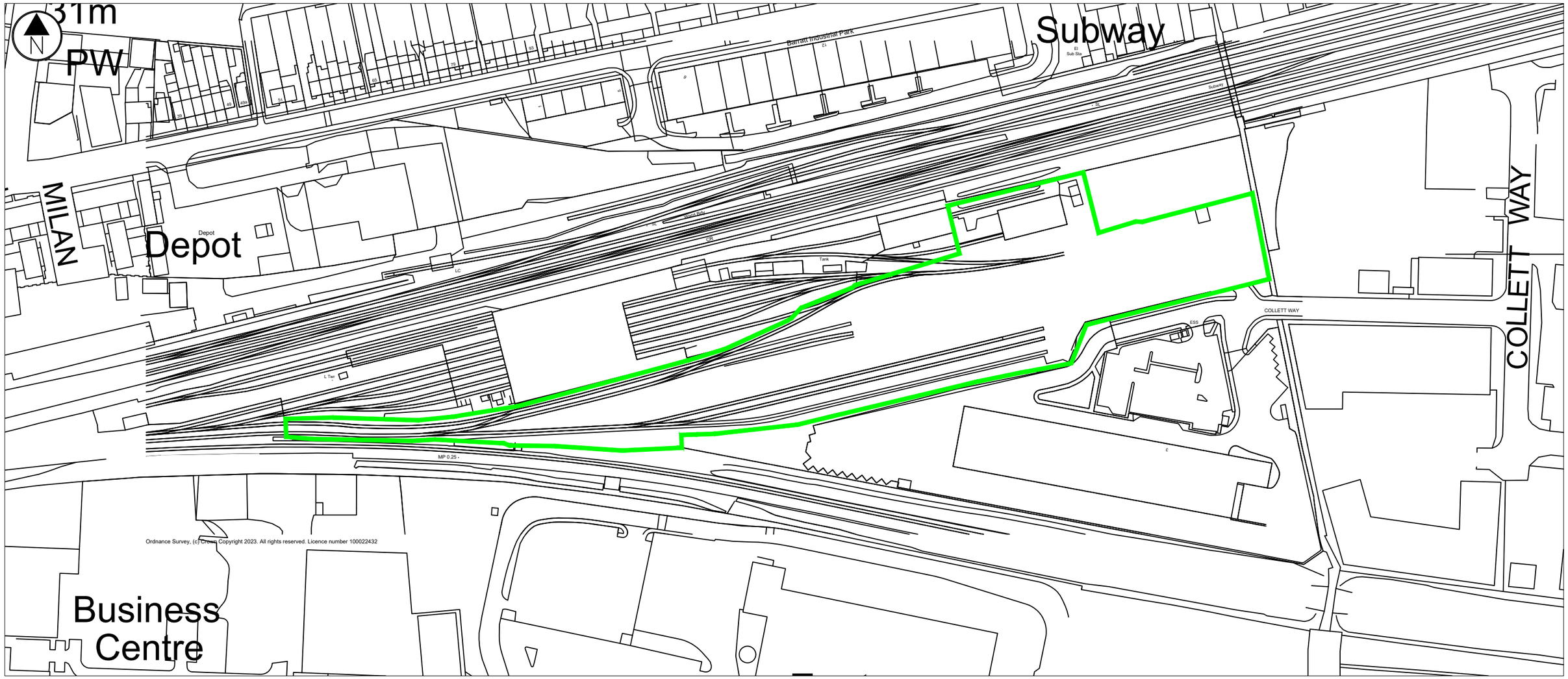
Site Location Plan

AA Environmental Ltd
Units 4-8
Cholswell Court
Shippon Abingdon
Oxon OX13 6HX

T:(01235) 536042
F:(01235) 523849
info@aae-ltd.co.uk
www.aae-ltd.co.uk

Environmental Consultants

Scale	Date	Drawn	Chkd.	Drg. No.	Rev.
1:5000@A3	Feb '24	EF	EB	233305/D/001	A



KEY

Permit Boundary

The centre of the site is located at Grid Reference No. TQ 13581 79887

Rev.	Details	Drawn / Chkd.	Date

Project

233305
Land off Collett Way
Southall, London
UB2 4SE

Title

Permit Boundary Plan

AA Environmental Ltd
Units 4-8
Cholswell Court
Shippon Abingdon
Oxon OX13 6HX

T:(01235) 536042
F:(01235) 523849
info@aae-ltd.co.uk
www.aae-ltd.co.uk

Environmental Consultants

Scale	Date	Drg. No.	Rev.
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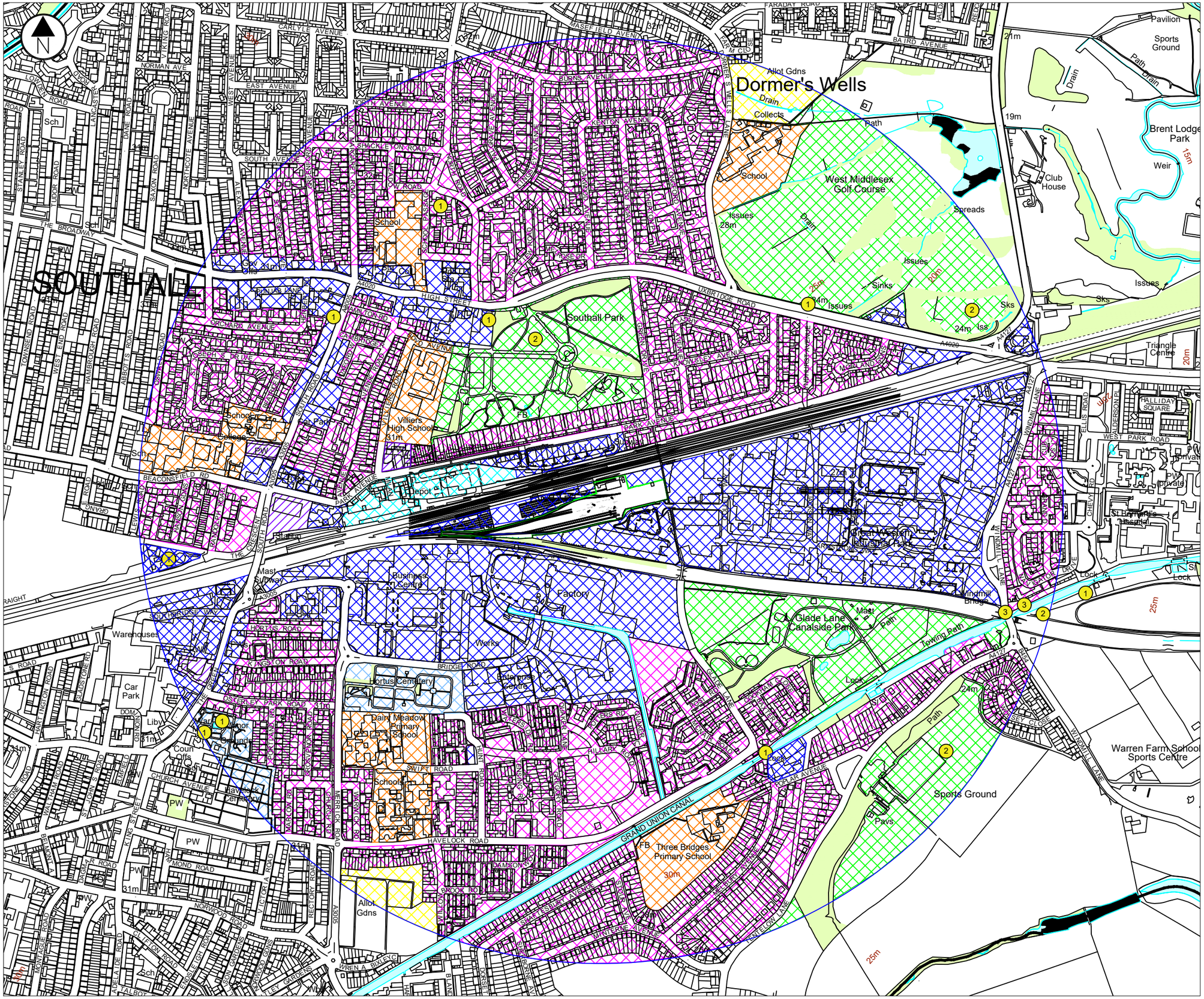
	Drawn: EF / Chkd.: EB		



KEY

- Site Boundary
- 1 km Radius
- Water Body
- Commercial / Industrial
- Residential
- Schools
- Recreational
- Place of Worship
- Allotment
- Cemetery
- Land with Planning Permission for Residential Development
- 1 Listed Building
- 2 Priority Habitat
- 3 Scheduled Monument

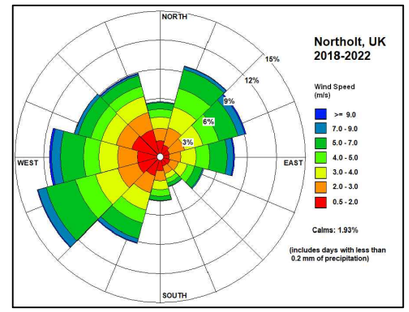


Figure 1. Meteorological wind data has been acquired from the Met Office from the Northolt weather station, which is approximately 7 km to the north of the site. The prevailing wind direction is from west-south-west.

Rev.	Details	Drawn / Chkd.	Date

Project

233305
Land off Collett Way
Southall, London
UB2 4SE

Title

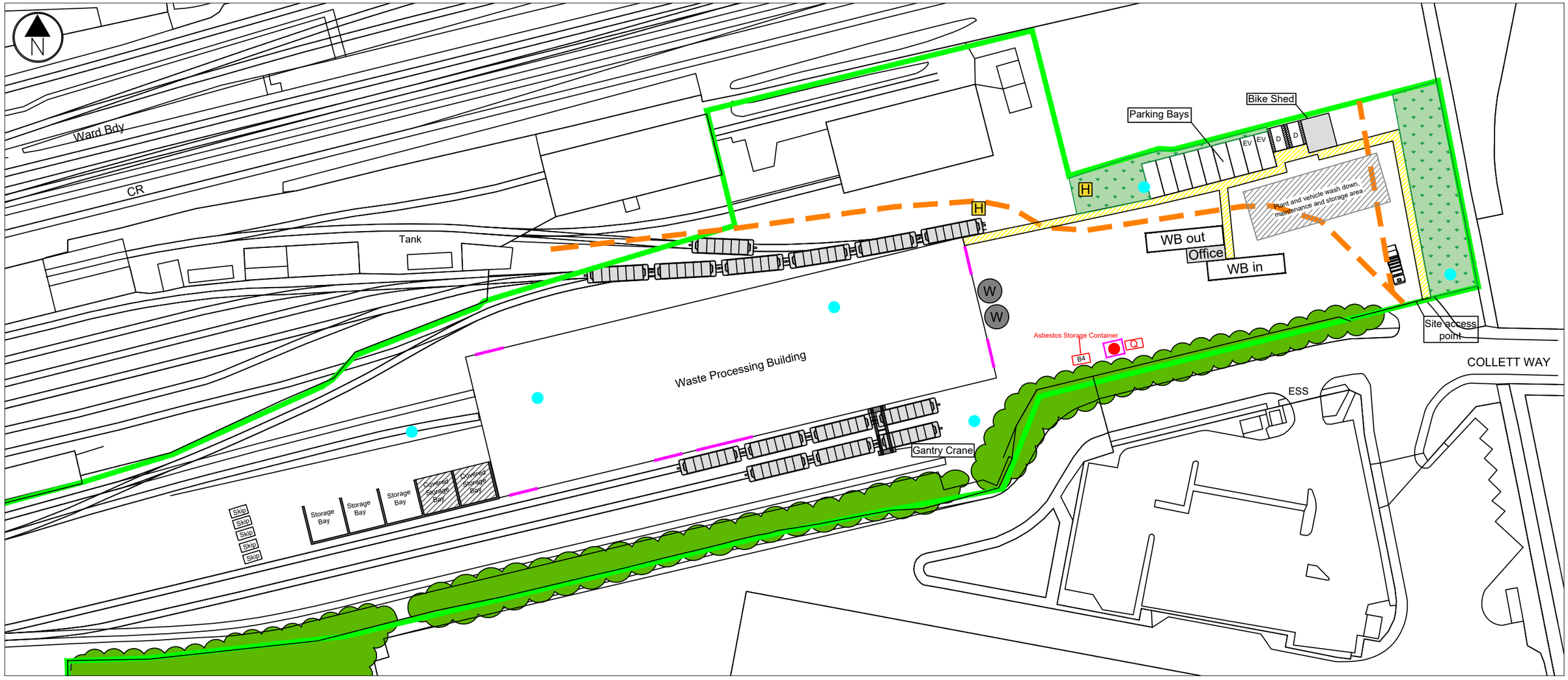
Site Receptor Plan

AA Environmental Ltd
Units 4-8
Cholswell Court
Shippon Abingdon
Oxon OX13 6HX

T:(01235) 536042
F:(01235) 523849
info@aae-ltd.co.uk
www.aae-ltd.co.uk

Environmental Consultants

Scale	Date	Drg. No.	Rev.
1:8000@A3	Feb '24	233305/D/003	A
	Drawn: EF / Chkd.: EB		



KEY

- Permit Boundary
- Haul Route Access for Network Rail
- Roller Shutter Doors
- W — Water Tank
- H — Fire Hydrant
- D — Disabled Parking Bay
- Storage Bay
- Weighbridge
- Hedgerow / Vegetation
- COSHH Storage
- Q — Sealed Quarantine Skip
- Visual Monitoring Locations
- Hopper Wagon
- Footpath
- Landscape Area

Notes:

1. The Waste Processing Building is 106 m (L) x 30 m (W) x 13 m (H).
2. The site is within an AQMA for NO2 and PM10 - no waste processing is permitted outside of the building.
3. All operational areas are capped by impermeable concrete hardstanding.
4. Outdoor storage is limited to specified wastes, and non-hazardous waste streams within fully sealed containers.

Rev.	Details	Drawn / Chkd.	Date

Project

233305
Land off Collett Way
Southall, London
UB2 4SE

Title

External Site Layout Plan

AA Environmental Ltd
Units 4-8
Cholswell Court
Shippon Abingdon
Oxon OX13 6HX

T:(01235) 536042
F:(01235) 523849
info@aae-ltd.co.uk
www.aae-ltd.co.uk

Environmental Consultants

Scale	Date	Drg. No.	Rev.
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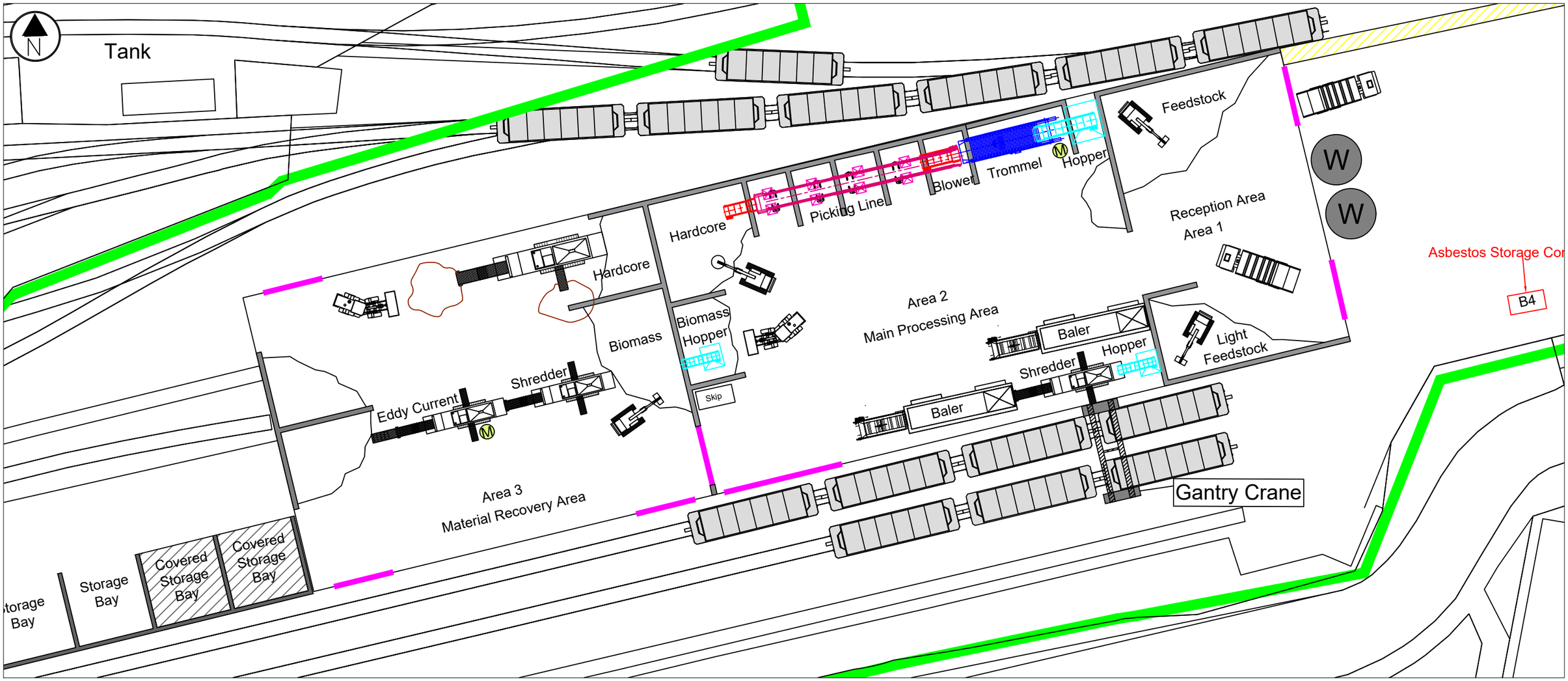

KEY

- Permit Boundary
- Roller Shutter Doors
- Storage Bay
- Hopper Wagon
- M — Magnet

Notes:

1. Area 1 (Reception Area): 570 m^2. Area 2 (Main Processing Area): 1,380 m^2. Area 3 (Material Recovery Area): 1,230 m^2.
2. All roller doors will be fit with sheet curtains.
3. The location and use of the inert aggregate processing plant and shredder are dependent on supply and demand variability.

Rev.	Details	Drawn / Chkd.	Date

Project
233305
Land off Collett Way
Southall, London
UB2 4SE

Title
Internal Site Layout Plan

AA Environmental Ltd
Units 4-8
Cholswell Court
Shippon Abingdon
Oxon OX13 6HX

T:(01235) 536042
F:(01235) 523849
info@aae-ltd.co.uk
www.aae-ltd.co.uk

Environmental Consultants

Scale	Date	Drawn	Chkd.	Drg. No.	Rev.
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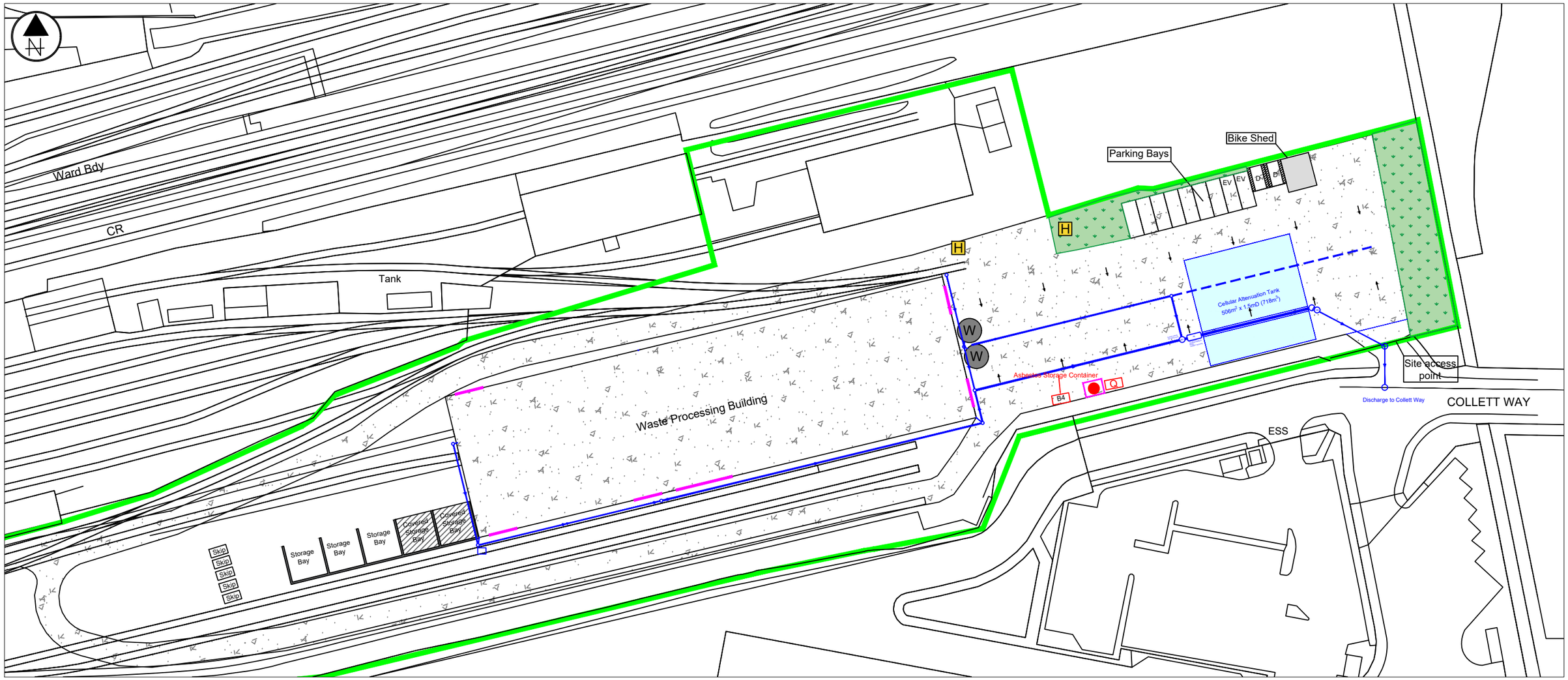


KEY

- Permit Boundary
- Drainage Run
- (W) Rainwater Harvesting Tank
- (S) Silt Trap
- (PI) Oil Interceptor
- Attenuation Tank
- (HB) Hydrobrake
- Gully
- Penstock valve (manual)

Notes

1. The whole of site will be capped on hardstanding or on an impermeable surface with a sealed drainage system.
2. The detailed drainage design is subject to planning approval but it is agreed that the proposal will be to discharge of surface water runoff to the Thames Water Network via sewer. Any connections and consents will be discussed with Thames Water.
3. Surface water runoff from the building roofs will be collected for storage and use on site.

Rev.	Details	Drawn / Chkd.	Date

Project

233305
Land off Collett Way
Southall, London
UB2 4SE

Title

Drainage Plan

AA Environmental Ltd
Units 4-8
Cholswell Court
Shippon Abingdon
Oxon OX13 6HX

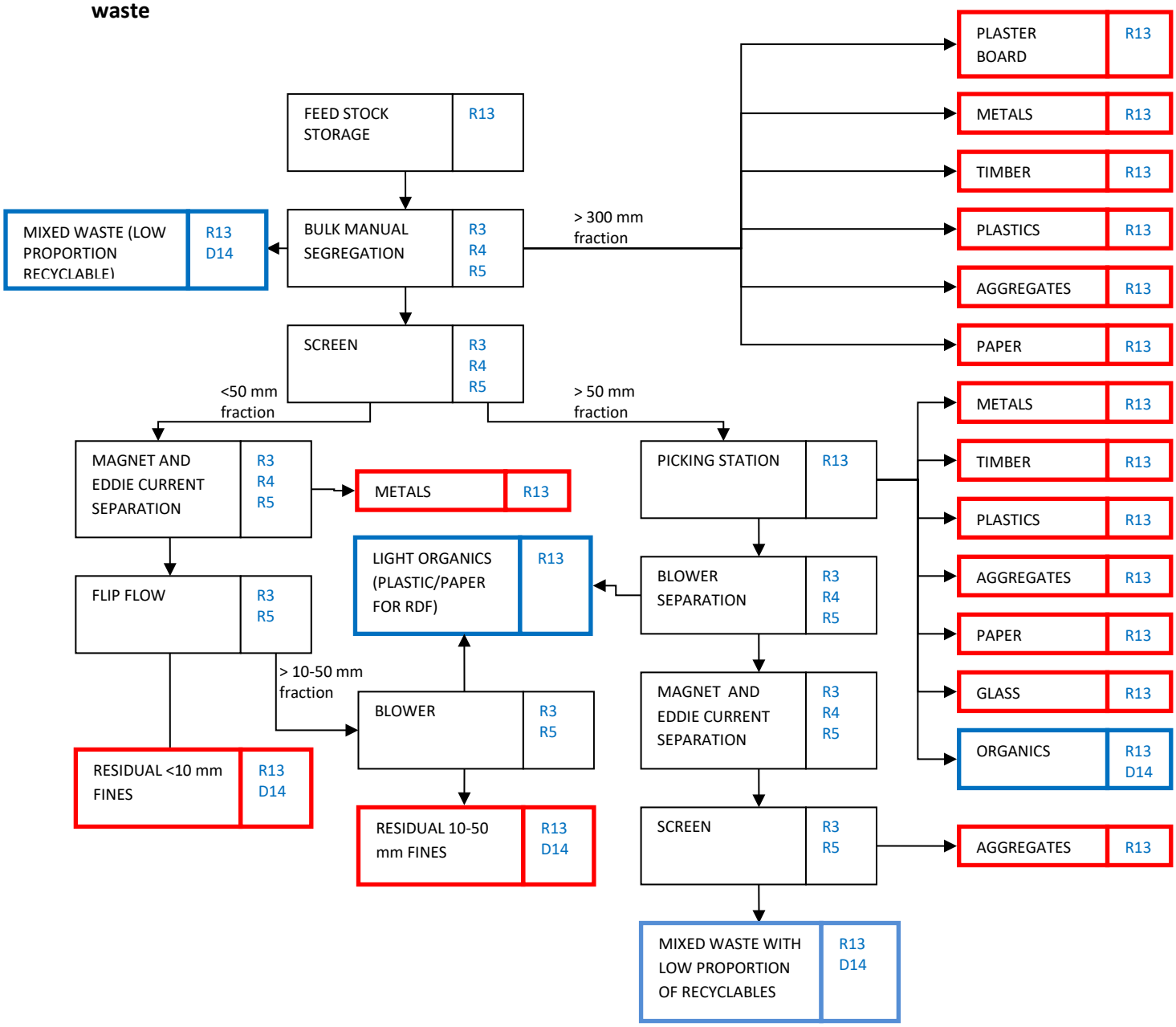
T:(01235) 536042
F:(01235) 523849
info@aae-ltd.co.uk
www.aae-ltd.co.uk

Environmental Consultants

Scale	Date	Drawn	Chkd.	Drg. No.	Rev.
1:800@A3	Feb '24	EF	EB	233305/D/005	A

Schematics

Schematic 1 Area 1 & 2. Process flow diagram for bulk non-hazardous (high proportion recyclable) solid waste



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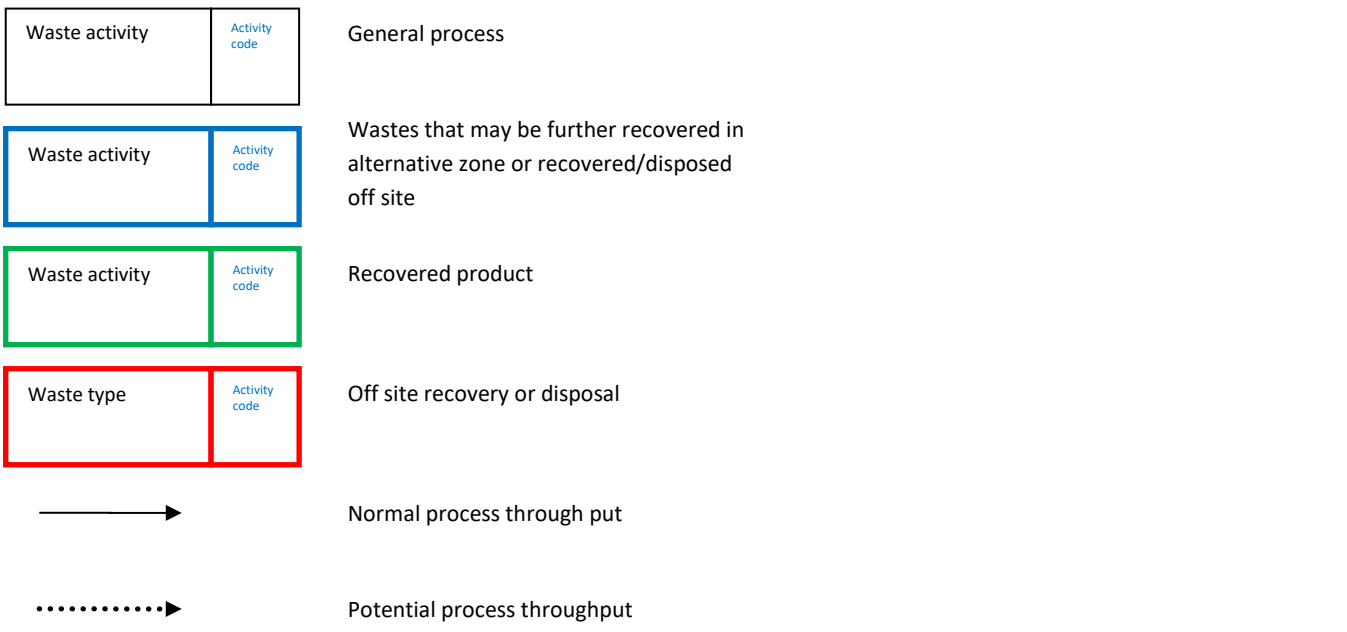
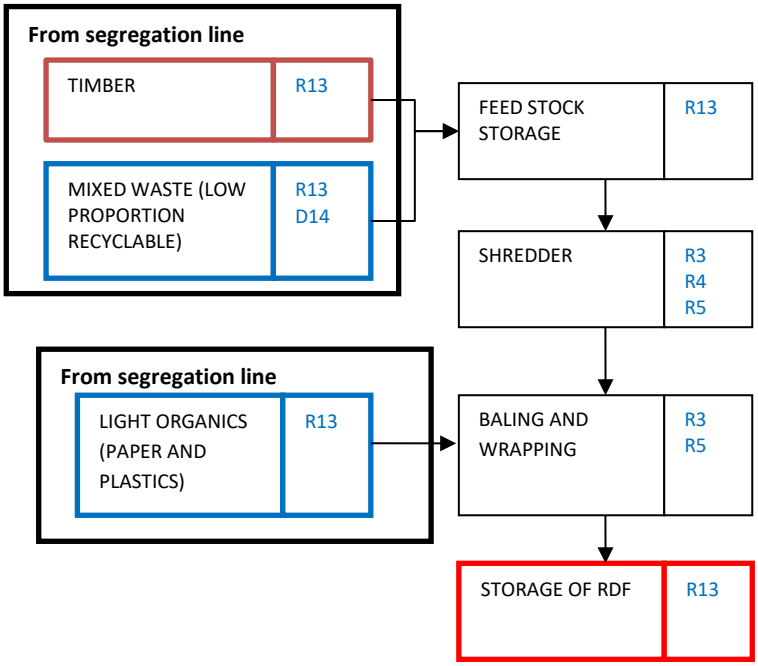


Schematic 2 Area 3. Process flow diagram for bulk non-hazardous (low proportion recyclable) solid non putrescible waste. Each waste stream is processed separately.



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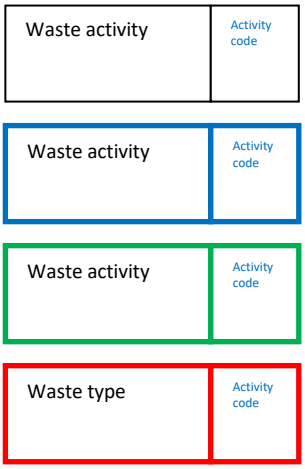

General process

Wastes that may be further recovered in alternative zone or recovered/disposed off site

Recovered product

Off site recovery or disposal

Normal process line

Potential process line

Schedules

Schedule 1. Specified Waste Management Operations	
Authorised Operations	**Limits of Operations**
D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced).	The maximum quantity of asbestos waste received at the site shall no exceed 10 tonnes per day. The maximum quantity of asbestos waste stored at the site shall not exceed 10 tonnes. There shall be no treatment of asbestos waste. No more than a total of 50 tonnes of intact and shredded waste vehicle tyres (waste codes 16 01 03 and 19 12 04) shall be stored at the site. Treatment consisting only of manual sorting, separation, screening, baling, shredding, crushing or compaction of non-hazardous waste into different components for disposal or recovery.
R13: Storage of wastes 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 in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12.	
R3: Recycling or reclamation of organic substances which are not used as solvents.	
R4: Recycling or reclamation of metals and metal compounds.	
R5: Recycling or reclamation of other inorganic materials.	

Schedule 2 Permitted Waste Types

Exclusions

Wastes having any of the following characteristics shall not be accepted:
- Consisting solely or mainly of dusts, powders or loose fibres
- Hazardous wastes
- Wastes that are a form which is either sludge or liquid

Waste Code	Description
01	**WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS**
01 04	**wastes from physical and chemical processing of non-metalliferous minerals**
01 04 08	waste gravel and crushed rocks other than those mentioned in 01 04 07
01 04 09	waste sand and clays
01 04 13	wastes from stone cutting and sawing other than those mentioned in 01 04 07
02	**WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING**
02 01	**wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing**
02 01 04	waste plastics (except packaging)
02 01 10	waste metal
02 04	**wastes from sugar processing**
02 04 02	off-specification calcium carbonate
03	**WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE, PULP, PAPER AND CARDBOARD**
03 01	**wastes from wood processing and the production of panels and furniture**
03 01 01	waste bark and cork
03 01 05	sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04
03 03	**wastes from pulp, paper and cardboard production and processing**
03 03 08	wastes from sorting of paper and cardboard destined for recycling
04	**WASTES FROM THE LEATHER, FUR AND TEXTILE INDUSTRIES**
04 02	**wastes from the textile industry**
04 02 09	wastes from composite materials (impregnated textile, elastomer, plastomer)
04 02 21	wastes from unprocessed textile fibres
04 02 22	wastes from processed textile fibres
06	**WASTES FROM INORGANIC CHEMICAL PROCESSES**

06 03	**wastes from the MFSU of salts and their solutions and metallic oxides**
06 03 16	metallic oxides other than those mentioned in 06 03 15
06 13	**wastes from inorganic chemical processes not otherwise specified**
06 13 03	carbon black
07	**WASTES FROM ORGANIC CHEMICAL PROCESSES**
07 02	**Wastes from the MSFU of salts and their solutions and metallic oxides**
07 02 13	waste plastic
10	**WASTES FROM THERMAL PROCESSES**
10 01	**wastes from power stations and other combustion plants (except 19)**
10 01 01	bottom ash, slag and boiler dust (excluding boiler dust mentioned in 10 01 04)
10 02	**wastes from the iron and steel industry**
10 02 01	wastes from the processing of slag
10 12	**wastes from manufacture of ceramic goods, bricks, tiles and construction products**
10 12 08	waste ceramics, bricks, tiles and construction products (after thermal processing)
15	**WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED**
15 01	**packaging (including separately collected municipal packaging waste)**
15 01 01	paper and cardboard packaging
15 01 02	plastic packaging
15 01 03	wooden packaging
15 01 04	metallic packaging
15 01 05	composite packaging
15 01 06	mixed packaging
15 01 07	glass packaging
15 01 09	textile packaging
16	**WASTES NOT OTHERWISE SPECIFIED IN THE LIST**
16 01	**end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)**
16 01 03	end-of-life tyres
16 01 17	ferrous metal
16 01 18	non-ferrous metal
16 01 19	plastic
16 01 20	glass
17	**CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)**
17 01	**concrete, bricks, tiles and ceramics**
17 01 01	concrete
17 01 02	bricks
17 01 03	tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02	**wood, glass and plastic**
17 02 01	wood
17 02 02	glass
17 02 03	plastic
17 03	**bituminous mixtures, coal tar and tarred products**
17 03 02	bituminous mixtures other than those mentioned in 17 03 01
17 04	**metals (including their alloys)**
17 04 01	copper, bronze, brass
17 04 02	aluminium
17 04 03	lead
17 04 04	zinc
17 04 05	iron and steel
17 04 06	tin
17 04 07	mixed metals
17 04 11	cables other than those mentioned in 17 04 10
17 05	**soil (including excavated soil from contaminated sites), stones and dredging spoil**
17 05 04	soil and stones other than those mentioned in 17 05 03
17 06	**insulation materials and asbestos-containing construction materials**
17 06 04	insulation materials other than those mentioned in 17 06 01 and 17 06 03
17 08	**gypsum-based construction material**
17 08 02	gypsum-based construction materials other than those mentioned in 17 08 01
17 09	**other construction and demolition wastes**
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
19	**WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE 19 01 WASTES**

	FROM INCINERATION OR PYROLYSIS OF WASTE
19 01	**wastes from incineration or pyrolysis of waste**
19 01 02	ferrous materials removed from bottom ash
19 10	**wastes from shredding of metal-containing wastes**
19 10 01	iron and steel waste
19 10 02	non-ferrous waste
19 12	**wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified**
19 12 01	paper and cardboard
19 12 02	ferrous metal
19 12 03	non-ferrous metal
19 12 04	plastic and rubber
19 12 05	glass
19 12 07	wood other than that mentioned in 19 12 06
19 12 08	textiles
19 12 09	minerals (for example sand, stones)
19 13	**wastes from soil and groundwater remediation**
19 13 02	solid wastes from soil remediation other than those mentioned in 19 13 01
20	**MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTUIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS 20 01 SEPARATELY COLLECTED FRACTIONS (EXCEPT 15 01)**
20 01	**separately collected fractions (except 15 01)**
20 01 01	paper and cardboard
20 01 10	clothes
20 01 11	textiles
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35
20 01 38	wood other than that mentioned in 20 01 37
20 01 39	plastics
20 01 40	metals
20 02	**garden and park wastes (including cemetery waste)**
20 02 02	soil and stones
20 03	**other municipal wastes**
20 03 03	street-cleaning residues

APPENDIX A

233305/SMS

1.0 MANAGEMENT

1.1 Wards of London Properties Ltd (the Operator) have a site-specific Environmental Management Systems in accordance with Environment Agency guidance. Within the systems, the site will operate in accordance with the following management systems, including but not limited to:

- Register of Environmental Effects;
- Operational Plan (OP);
- Accident Management Plan;
- Spill Response Plan;
- Dust Emissions Management Plan (DEMP);
- Fire Prevention Plan (FPP);
- Site and Equipment Maintenance Plan; and
- Complaints procedure.

1.2 The Plans will set out the following information:

- Environmental Policy
  High level policy document outlining the Operator's commitment to the laws, regulations, and other guidance concerning environmental issues.

- Register of Environmental Effects
  Standalone document detailing the aspects and impacts in a risk-based profile for all site specific potential emissions.

- Operational controls and responsibilities including method of works
  This forms part of the site-specific Method Statement and Risk Assessment and read in conjunction with all of the management plans. This includes the OP, DEMP, and FPP.

- Site Infrastructure plan
  Series of plans detailing site infrastructure, vulnerable locations, drainage, and utilities.

- Site and equipment maintenance regime
  All mobile and handheld equipment, belonging to the Operator, is maintained in accordance with manufacturer's recommendations. There is a maintenance register and daily checklist which is applicable to this site.

- Accident prevention / management plans and procedures
  These include the spill response and contingency procedures in the event of an accident.

- Complaints procedure
  The Operator has a complaints procedure, which can be implemented at the site. As part of the procedure, there is a complaints proforma which details the complaint, complainant, corrective and preventative actions.

- Staff competence & Training
  Staff training and qualifications will be recorded, updated and reviewed in accordance with the Operator's internal systems. It can be directly transposed to a site-specific level.

- Record keeping
  Records will be kept in accordance with the Permit requirements. All records will be kept on site and a copy kept at the Operator's main office.

- Review process (ongoing review of the Management System)

There will be yearly review of both the site-specific management plans. Following an unforeseen event or complaint, the systems will be reviewed.

1.3 The site will clearly establish and monitor performance for key objectives, this includes, but is not limited to:

- Material and waste compliance;
- Incidents and complaints by category; and
- Non-conformances.

APPENDIX B

Wards of London Properties Limited

Waste Transfer and Treatment Facility Collett Way, Southall

Accident Prevention and Management Plan (APMP)

Table of Revisions

Issue	Date	Description of status
1	04/10/2023	First Issue

1.0 INTRODUCTION

Overview

1.1 This Accident Prevention & Management Plan (APMP) relates to the Standard Rules SR2015 No.10 at Land off Collet Way, Southall UB2 4SE, operated by Wards of London Properties Limited. The site operation is a Household, Commercial and Industrial Waste Transfer Station with inert and non-hazardous waste treatment; including bulking up and storage of asbestos waste. The total quantity of waste that can be accepted at the site is a maximum of 75,000 tonnes a year. All bulking, transfer, and treatment of non-hazardous waste must be carried out under cover.

Purpose

1.2 The Accident Prevention & Management Plan details the steps and contingency plans to be taken when dealing with an accident or unforeseen emergency event on site. This is required to protect employees and protect the environment.

2.0 KEY CONTACTS

Contact	Contact Number
TBC	TBC
TBC	TBC

3.0 ACCIDENT PREVENTION & MANAGEMENT

3.1 Table 1 outlines all potential accidents, likelihood, consequence and preventative and management control

Table 1. Accident Prevention & Management				
Potential Incident	**Likelihood of Incident**	**Consequence of Incident**	**Preventative Measures**	**Accident Management Measures**
Equipment breakdowns	Medium	Medium	Pre-Start check and the Daily Site Diary are undertaken on a daily basis. All machinery is maintained according to the manufacturer's or supplier's recommendations.	Any signs of degradation/deterioration to plant are identified to the Site supervisor during the pre-start check. The plant is not used until the extent of damage is determined and any repairs/corrective measures undertaken.
Unexpected shutdowns	Medium	Medium	The site is operated in accordance with the approved OP and management systems.	In the event of an unforeseen shut down Wards of London Properties Limited will re-direct waste to a licenced facility.
Extreme weather conditions	High	Medium	Inspection of site drainage network on a daily basis to ensure no debris blocking system leading to surface water flooding on site. Pre-Start check on all plant is implemented to ensure optimum performance during all weather conditions. A climate change risk assessment will be complete and updated in line with the Environmental Management Systems.	During wet periods, the road sweeper will be deployed to ensure no mud on road. During dry periods, the wider site is operated in accordance with the OP with appropriate dust suppression measures implemented. Water can be recycled with no need for top up. Extreme weather conditions will be recorded in the Daily Site Diary.
Flood event	High	Severe	The site is in Flood Zone 1 – it has a less than 1 in 1,000 annual probabilities of river or sea flooding. The Envirocheck report shows that the site is susceptible to flooding by surface water and groundwater. The site manager will sign up for flood warnings.	In the very unlikely event that the site is alerted to a potential flooding event, the site will immediately implement the following measures to minimise the availability of debris: • Complete a litter pick around site; • Ensure all waste and chemical storage is moved to higher ground, which may include temporary storage within the full enclosure with shut doors. • Ensure all mobile plant is moved to higher ground, where possible, and ensure that they are clean and parked. • Re-direct all incoming waste to a licenced facility All flood events, and site responses to them, will be recorded in the Daily Site Diary.

Fire	Medium	Severe	No wastes to be burned on site. All storage of waste in accordance with OP and Fire Prevention Plan (FPP). Site is secure overnight when not in operation. Access controlled during operation hours.	The site will operate in accordance with the FPP. All site operatives are briefed on the muster point location and key contact details will be placed on all noticeboards. In the event of fire, controls specified in the FPP, Health & Safety Plan and the fire service notified. Incidents recorded in the Site Diary. Small scale, locally contained fires should be suppressed using the fire extinguishers (in the main site compound and all buildings) or inert, non-combustible soils provided. In the event that either the fire cannot be contained, or a person is not active in managing the situation, staff should immediately cease all work activities and evacuate the permitted site area to the muster point. The site supervisor will take the register from the site office. The site supervisor will co-ordinate with the Emergency Services.
Vandalism	Low	High	The wider site is bordered by existing fencing and access gate is locked when not in operation. All process machinery and plant will be turned off and system panels locked to ensure no tampering with equipment.	Pre-Start check and the Daily Site Diary are implemented. Any signs of vandalism to plant or material will be identified to the Site supervisor. The material or plant will not be used until the extent of vandalism is determined and any repairs/corrective measures undertaken.
Spillage of fuels, oils or polluting material.	Low	High	All hazardous substances used on site will be stored in lockable, double-bunded container within a designated area, within the wider site boundary. No hazardous or liquid wastes would be accepted on site.	Spill response procedure will be in accordance with the Spill Response Plan. Spill kits are maintained on site. All staff are trained on controls and spill response procedure.

Spillage of waste.	Very Low	High	No hazardous or uncontained wastes are accepted on site. All road sweeper vehicles accessing the site is fully enclosed. Emptying would be controlled at all times.	In the event a spillage of waste is identified on site, within the wider site boundary or on the public highway, a road sweeper is deployed to clean the spillage. Incidents recorded in the Site Diary.

4.0 COSHH STORAGE PROCEDURE

4.1 All hazardous substances are stored within the wider site compound in a lockable, sealed storage container. All substances are stored on secondary containment with a total storage capacity of 110%. Control of hazardous substances will be in accordance with the COSHH Regulations (2002).

4.2 A COSHH register is maintained on site including all hazardous substances' safety data sheets.

5.0 RECORDS

On site Records

5.1 A copy of this management plan is kept on site and briefed to all site operatives upon site induction. Any identified incidents or accidents, as well as corrective measures, are recorded in the Daily Site Diary.

Review

5.2 This management plan is reviewed on a yearly basis or post-incident to ensure it remains up-to-date with the site operations. The COSHH register is reviewed on an annual basis and updated every time a new hazardous substance is used on site.

APPENDIX C

Spill Response Plan

Purpose:
This procedure details the steps to be taken when dealing with a spillage of a hazardous substance on site. It is required in order to:

- Protect Employees
- Protect the Environment

Procedure:

This procedure should be followed for all small, large and massive spills, which may occur.

Definitions:

Small Spill: Less than 5 litres

Large Spill: Greater than 5 litres and less than 250 litres.

Massive Spill: Greater than 250 litres

Materials to be maintained on site at all times

There will be a spillage kit on site at any time. There is no storage of oil or chemicals on site. Each spill kit will contain the following items:

Spill kits will include as a minimum:
- 5 no. sacks of granules
- 5 no. oil only pads
- 6 heavy duty plastic bags and cable ties.
- 1 pair heavy duty chemical resistant gloves

Procedures
1. Hazardous materials shall be handled (loaded, unloaded and moved) by a competent person using the correct equipment and appropriate protective clothing. Appropriate precautions should be taken at all times to minimise the risk of accidental spillage.

2. In the event of a spillage occurring, the Site Supervisor or the Deputy Site Supervisor shall initially and rapidly investigate the following issues:

- How long it has been since the incident occurred.
- Consult the relevant data sheets (Material Safety Data Sheets or otherwise) for the method of spill containment and fire control of the affected material.
- Contact the relevant emergency response number (local fire service, police, hospital and Environment Agency) telephone numbers which are detailed on the Contact List as determined necessary.
- Note the wind direction and any possible sources of ignition i.e. fuel.

3. Evacuate the area (for large spills if necessary)

- The Site Manager or any other designated person from the Emergency Response Team shall ensure that all personnel are evacuated in a calm, efficient manner. Staff should be instructed to walk briskly to their designated evacuation locations.
- If flammable material is involved in the spill, isolate equipment and materials that may be affected.

4. For large spills the Site Supervisor should ensure that the spill cannot migrate to the soakaway. This can be achieved by constructing a small earth bund down gradient with a dozer or excavator.

5. The spillage must be contained by soil or using absorbent material, socks, booms, absorbent granules. The Site Supervisor or any other designated person from the Emergency Response Team shall ensure that all appropriate personal protective equipment is worn [as detailed in the Material Safety Data Sheet for the spilled material(s)].

6. If the spillage emanated from a drum, position the drum so that the ruptured section is in an upwards direction, preventing a further leakage.

7. Once the spill has been contained the liquid shall either be pumped, or removed into a container using non-spark shovels and labelled appropriately (contents, name and date).

8. Clean up Operation:

   - Use shovels and brushes to sweep the spilled material into containers or heavy duty plastic bags.
   - Start on the outside and work in towards the centre of the spill.
   - Do not mix different types of waste.
   - Drum the waste and seal the container or bag and double bag.
   - Label the waste with the destination name, appropriate hazard label and name of waste giving as much information as possible on contents, plus concentrations of constituents, etc.
   - If the spill occurred due to a damaged drum, place the ruptured drum into a salvage drum container, until disposal is arranged.
   - Personnel will decontaminate themselves by using the washing facilities.

9. Any waste material resulting from a spillage clean-up shall be disposed of to an appropriate facility for disposal and/or recovery. If the affected material is considered hazardous, it is stored in a container and collected as soon as possible by a certified hazardous waste disposal contractor.

10. Following an emergency, the Site Supervisor shall record details of the incident in the Site Diary and notify the Operations Manager.

11. The EA shall be informed if the spill cannot be readily controlled and there is any risk of entry into the drainage.

12. In the event that any spillage enters the wider land drainage network the EA should be notified. Place booms across the surface of the drains to trap free product.

13. The Site Supervisor must ensure that the resultant depleted spill kit (s) is / are replenished within 48 hours of the spill occurring.

14. On a weekly basis all spill response equipment shall be checked to ensure it is provided in agreed quantities and in suitable working condition.

APPENDIX D

Complaints Procedure

233305/CP

INTRODUCTION

This Complaints Procedure outlines how the Operator will respond in the event of a complaint. A complaint may arise relating to the site permitted activities involving a nuisance (dust, noise, odour, pests). This procedure contains information on how any complaint will be investigated and any actions taken as a result of the complaint.

KEY CONTACTS

The key contacts will be shown on the site notice board at the site entrance. Alternatively, any complaints can be made at the site to any site operative and/or the Site Manager.

PROCEDURE

1. Any complaints made will be immediately logged by the Site Manager and/or Site Operative. In the event a complaint is made to a Site Operative, the Site Operative will refer the complaint to the Site Manager. If able to do so, the complainant details will be taken on initial contact either by phone or in person. The response time is typically within 1 hour.

2. The Site Manager (or nominated operative) will discuss any concerns with the complainant directly within 1 working day of the complaint being made; and request contact details to notify the complainant of any updates/corrective measures. The complaint will be logged using the Complaint Form (attached) and given a unique reference number.

3. The Site Manager will review the site activities and ensure control measures are in accordance with the Site's Management Systems. This review will typically happen in conjunction with point 1 and review will be undertaken within 2 working days of complaint being made.

4. Once initial contact and review of the site has been undertaken, the Site Manager will investigate the location of concern raised in relation to the site i.e. at a local receptor location and/or public highway to inspect the impact on the receptor. This will occur within 3 working days.

5. The Site Manager will notify the complainant of any updates to the control measures / site operations. Control measures may be corrective and/or preventative and include additional control measures and/or increase the frequency of an existing control measure. Alternatively, the design of the site operations may change to decrease nuisance to that receptor. The notification will be within 1 week of the complaint being made.

6. In the event the same issue persists, the Site Manager will further review site operations and control measures. This may require a temporary cessation of certain operations whilst additional measure is implemented. The works will not recommence until further control measures have been incorporated and a review of effectiveness has been agreed / witnessed by the Site Manager. The complainant will be kept abreast of further measures. This is likely to be within 1-2 weeks subject to what the complaint is, severity of complaint and associated activity taking place.

7. In the event of an out of hour complaint, the complaint will be picked up on the next working day and dealt with as per point 1-6 above.

RECORDS

On site Records

A copy of this procedure is kept on site and briefed to all site operatives upon site induction. Any identified complaints, incidents or accidents, as well as corrective measures, are recorded in the Complaint Form. Copies of the complaint forms are kept on site.

Complaints Procedure

233305/CP

Review

This procedure is reviewed on a yearly basis or post-incident to ensure it remains up-to-date with the site operations. The review procedure would involve the Senior Management Team and site team collectively to establish the root cause and the best available control techniques. The review will take place within 1 month of the incident.

APPENDIX E

Housekeeping Checklist

Date		Completed by		Site Manager	
		✓/X	Tidiness (1 – 5)	Additional Notes/ Attention Needed?	
Litter Pick Completed?					
Temporary Stockpiles Sealed?					
Large Debris Tidied?					
Access Point Swept?					
Haul Route Inspected?					
Car Park Inspected?					
Highway Inspected?					
Additional Notes for Other Location Identified					
Location Description					

APPENDIX F

SITE DAILY DIARY

Site		Date		Author initial	

Administration						
Weather	**Dry**	**Gentle rain**	**Heavy rain**	**Snow**	**Windy**	**Calm**
	☐	☐	☐	☐	☐	☐
TCP presence	**Name**			**Hours**		
Environment Agency	**Name**			**Time**		
Notable admin						
EA / CAR issue						

Waste operations		
Area of tipping		
Any unacceptable waste in quarantine / rejected		
Plant issues		

Site inspection	**Compliance**	**Any corrective action(s)**
1. Pollution control (silt / oil storage / spill kit management)	Y / N	
2. Waste management	Y / N	
3. Dust (see overleaf)	Y / N	
4. Mud on road	Y / N	
5. Litter	Y / N	

Other matters (or continuation from above)