

**C2 Q2 Table 1**

Transfer of waste oils up to 10 tonnes per day and 50 tonnes of storage

## C2 Q3B - WAMITAB CERTIFICATE

# Continuing Competence Certificate

This certificate confirms that

John Simpson

Has met the relevant requirements of the Continuing Competence scheme for the following award(s) which will remain current for two years from 27/01/2023

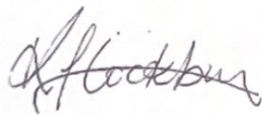
TMNH

Treatment - Non Hazardous Waste

Expiry Date:  
27/01/2025

Verification date: 18/01/2023

Authorised:



Professional Services Director

Learner ID: 16306

Certificate No.: 5216077

Date of Issue: 27/01/2023



CIWM Chief Executive Officer



The Chartered Institution  
of Wastes Management



Scan code on reverse to authenticate that this is a genuine paper

## C2 Q3d - ENVIRONMENTAL MANAGEMENT SYSTEM

TO BE AMENDED TO INCLUDE THE ADDITIONAL WASTE TYPES SPECIFIED IN THE APPLICATION

# **J SIMPSON WASTE MANAGEMENT**

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## **ENVIRONMENTAL MANAGEMENT SYSTEM**

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**Operating Procedures**  
**Reference: EMS-OP-01**  
**Version 5 Dated 14 July 2021**

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**163-165 Brent Road**  
**International Trading Estate**  
**Southall**  
**UB2 5LJ**

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**Environmental Permit EPR/WE0239AB**

<b>J SIMPSON WASTE MANAGEMENT</b>	<b>Operating Procedures</b>		
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 6</b>	<b>Issue Date: 13.8.21</b>	

**DOCUMENT CONTROL SHEET**

<b>Version Reference</b>	<b>Date</b>	<b>Reason for Change</b>	<b>Issued by</b>
1	03.04.2020	Application for Environmental Permit	ARC
2	5.2.2021	Schedule 5	ARC
3	1.3.2021	Schedule 5	ARC
4	10.3.2021	Description for 191212	ARC
5	14.7.2021	Minor amendments to Layout	ARC
6	13.8.21	Waste Acceptance	ARC

<b>J SIMPSON WASTE MANAGEMENT</b>	<h1>Operating Procedures</h1>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 6</b>	<b>Issue Date: 13.8.21</b>

## CONTENTS

<b>1</b>	<b>INTRODUCTION.....</b>	<b>1</b>
	1.1 Roles and Responsibilities.....	1
	1.2 Purpose.....	1
	1.3 Operator.....	1
	1.4 Scope.....	1
	1.5 Block Diagram.....	3
	1.6 Management System.....	3
<b>2</b>	<b>MANAGEMENT OF OPERATIONS.....</b>	<b>5</b>
	2.1 Site Layout and Signage.....	5
	2.2 Security.....	5
	2.3 Incidents and non-conformances.....	5
	2.4 Technical Competence and Training.....	6
	2.5 Site Records.....	8
	2.6 Inspection and maintenance.....	9
	2.7 Complaints.....	9
<b>3</b>	<b>WASTE HANDLING PROCEDURES.....</b>	<b>11</b>
	3.1 Pre-Acceptance Procedures.....	11
	3.2 On Site Waste Acceptance.....	14
	3.3 Non-Permitted Waste.....	14
	3.4 Waste Storage.....	14
	3.5 Waste Treatment.....	16
	3.6 Planned Preventative Maintenance.....	17
	3.7 Routine Cleaning.....	18
<b>4</b>	<b>EMISSIONS MANAGEMENT AND MONITORING.....</b>	<b>19</b>
	4.1 Introduction.....	19
	4.2 Fugitive Emissions to air – dust, mud and litter.....	19
	4.3 Odour.....	19
	4.4 Noise.....	20
	4.5 Fugitive emissions to groundwater.....	20
	4.6 Pests, Vermin and Birds.....	20
	4.7 Point Source Emissions to air.....	20
	4.8 Point Source Emissions to Surface Water.....	20
	4.9 Point Source Emissions to Foul Sewer.....	21
	4.10 Monitoring.....	21
<b>5</b>	<b>ADDITIONAL MEASURES.....</b>	<b>22</b>
	5.1 Raw material inputs.....	22
	5.2 Waste Minimisation Audit.....	22
	5.3 Waste Recovery or Disposal.....	22
	5.4 Water Use.....	22
	5.5 Energy Efficiency.....	22

<b>J SIMPSON WASTE MANAGEMENT</b>	<b>Operating Procedures</b>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 6</b>	<b>Issue Date: 13.8.21</b>

**APPENDIX A: ENVIRONMENTAL RISK ASSESSMENT**

**APPENDIX B: ACCIDENT RISK MANAGEMENT PLAN**

**APPENDIX C - PERMITTED WASTES**

**APPENDIX D – WASTE ACCEPTANCE PROCEDURES EWC191212**



<b>J SIMPSON WASTE MANAGEMENT</b>	<h1>Operating Procedures</h1>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 6</b>	<b>Issue Date: 13.8.21</b>

## 1 INTRODUCTION

### 1.1 Roles and Responsibilities

The Technically Competent Manager has responsibility for ensuring these procedures are adhered to which includes communication with staff and contractors, and the provision of adequate training.

The Technically Competent Manager is responsible for updating and re-issuing these procedures as necessary and ensuring all staff are trained in new procedures.

### 1.2 Purpose

The purpose of these procedures is to guide staff and contractors in the safe conduct of their duties in a manner which controls the environmental impacts of the company's operations. The procedures cover normal operations on site and should be read in conjunction with the Emergency Operational Procedures (EMS-OP-02).

### 1.3 Operator

The company has been operating for over 15 years, providing waste management services in London. They currently operate from a site in Willesden. The land is subject to redevelopment and therefore a new site is required to provide a replacement facility.

JSW provide a skip hire service to residents and businesses in London. They currently employ 25 staff. All of which will be transferred to the new site.

### 1.4 Scope

These Operational Procedures cover:

- Operations involving non-hazardous waste
- Treatment of non-hazardous waste

The procedures relate to the permitted activities at 163-165 Brent Road, International Trading Estate, Southall, UB2 5LJ.

The site can meet the Standard Rules Permit SR2015 No6: 75kte household, commercial and industrial waste transfer station with treatment. The only exception to this, is the requirement to receive waste coded EWC 191212. For this reason alone, a bespoke permit is required.

#### 1.4.1 Permitted Waste Management Operations

The permitted activities will cover those set out in Table 1.

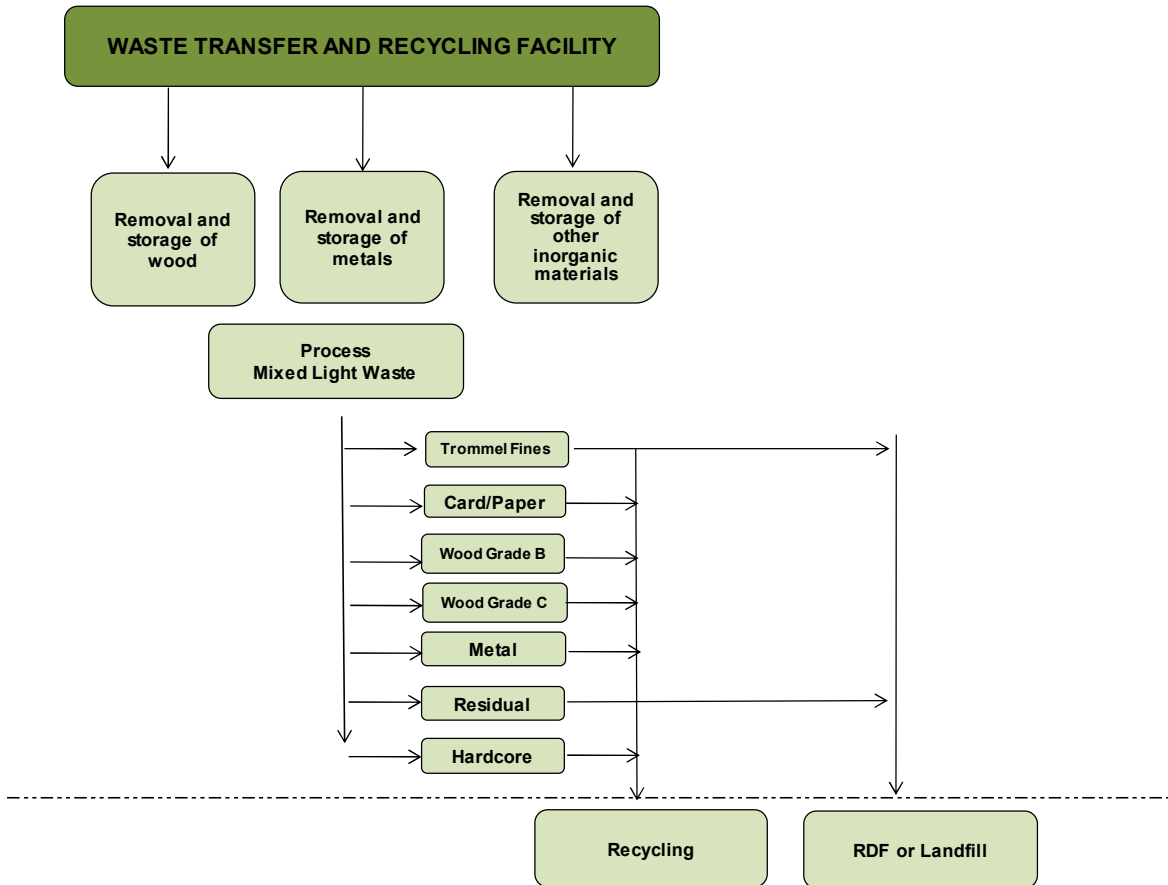
<b>J SIMPSON WASTE MANAGEMENT</b>	<b>Operating Procedures</b>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 6</b>	<b>Issue Date: 13.8.21</b>

**Table 1 Permitted Activities**

<b>Description of specified activity</b>	<b>Limits of specified activity</b>
R3 Recycling/reclamation of organic substances which are not used as solvents	Treatment consisting only of sorting, separation, screening, baling, shredding, crushing or compaction of waste into different components for disposal (no more than 50 tonnes per day) or recovery.
R4 Recycling/reclamation of metals and metal compounds	
R5 Recycling/reclamation of other inorganic materials.	
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)	
D15 Storage of wastes pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)	
D9 Physico-chemical treatment	
D14 Repackaging prior to submission to any of the operations numbered D1 – D13.	

<b>J SIMPSON WASTE MANAGEMENT</b>	<h1>Operating Procedures</h1>	
Document Reference: EMS OP 01	Issue Number: 6	Issue Date: 13.8.21

## 1.5 Block Diagram



## 1.6 Management System

The Management System covers all aspects of operations and aims to effectively manage the impacts of the business on the environment including the health and safety of staff. The key documents include:

- a) Documents: Procedures to set out how to undertake operations and checking for any issues.
  - EMS-OP-01 Operational Procedures
  - EMS-OP-02 Emergency Procedures
  - EMS-OP-03 Fire Prevention Plan
  - EMS-OP-04 Odour Management Plan
  - EMS-OP-05 Dust Management Plan
  - EMS-OP-06 Noise Management Plan

<b>J SIMPSON WASTE MANAGEMENT</b>	<b>Operating Procedures</b>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 6</b>	<b>Issue Date: 13.8.21</b>

- b) Forms on which to record information and provide evidence of the system functioning properly.

<b>J SIMPSON WASTE MANAGEMENT</b>	<h1>Operating Procedures</h1>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 6</b>	<b>Issue Date: 13.8.21</b>

## 2 MANAGEMENT OF OPERATIONS

The following procedures will be implemented by staff and contractors under the responsibility of the Site Manager.

These procedures cover normal operations. See EMS-OP-02 for Emergency Procedures.

### 2.1 Site Layout and Signage

The boundary of the permitted area is shown on Drawing No. JSW-BR-EP-01. A Site Layout Plan is shown on Drawing No. JSW-BR-EP-02.

The site plan shows the building that will be used to receive, treat and store waste. This has been constructed using 32-1000 profiled sheet 0.7mm thick panels. There is one door opening on the western elevation. The entire building is steel clad except for the one access door. The roof is also steel clad.

Staff will only conduct operations in the appropriate part of the site, following instructions provided by the Site Manager.

At the entrance to the site a sign board will display the following information:

- Permit holder's and Operator's name
- An emergency contact name and the Operator's telephone number
- A statement that the site is permitted by the Environment Agency
- The permit number
- Environment Agency national numbers, 03708 506506 and 0800 807060 (incident hotline)

The sign will be kept in good order to ensure it is legible.

A notice board will be maintained in the site office. A copy of the Environmental Permit and this EMS will be kept in the site office.

### 2.2 Security

The site is secured with steel palisade fencing or brick walls.

The site has one access point via a gated entrance which is closed when the site is not manned.

The site fencing and gates will be checked daily. Daily Checks Form EMS-FR-04.

A security guard is provided for non-operational hours.

### 2.3 Incidents and non-conformances

All incidents and non-conformance will be reported to the Site Manager who will investigate the incident and complete an Incident Report Form EMS-FR-02. Non-conformances relating

<b>J SIMPSON WASTE MANAGEMENT</b>	<h1>Operating Procedures</h1>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 6</b>	<b>Issue Date: 13.8.21</b>

to non-permitted waste will be specifically recorded on the Non-Permitted Waste Form EMS-FR-01.

Incidents can include complaints from the public, any observations that mean procedures are not being adhered to or accidents such as spillages. This procedure does not replace the reporting of health and safety incidents which fall under the scope of the Health & Safety.

## 2.4 Technical Competence and Training

### 2.4.1 Site Operations

The site operations will be overseen by a Technically Competent Manager (TCM). There will also be a Site Supervisor to oversee the day to day operations. The TCM will be responsible for ensuring the requirements of continued competency is met. A copy of the Certificate will be kept in the site office. The TCM and Site Supervisor will both carry out similar functions on site, with the TCM providing the overall management to ensure compliance.

The Site Management will be responsible for the control of incoming and outgoing vehicles, checking Duty of Care documentation, keeping and maintaining all computerised records, checking in all visitors to the site, issuing Health & Safety instructions and investigating any complaints.

Other site personnel will include administrative staff and site operatives.

All personnel will receive induction training which will describe the requirements of the Environmental Permit and these Operational Procedures. The responsibilities set out below relate to the implementation of this EMS only.

### 2.4.2 Site Management Responsibilities

The Site Management will be responsible for:

- Investigating any incidents or non-conformances or complaints in accordance with the relevant procedures and reporting forms.
- Ensuring that required data is provided to the Environment Agency at the agreed frequency.
- Daily site checks in using EMS FR 04 Daily Checks Form.
- Ensuring site maintenance is completed in accordance with these procedures.
- Ensuring all drivers are familiar with the site rules.
- Ensuring all operational staff have a suitable induction to the site and have had the relevant training.
- Ensuring all staff are familiar with safe operation of all necessary aspects of the site, relevant to their specific roles.
- Ensure all staff have PPE specific to their roles.

### 2.4.3 Site Operative Responsibilities

It is the responsibility of Site Operatives to:

- Act in accordance with the instruction given to them from the TCM or Site Supervisor.

<b>J SIMPSON WASTE MANAGEMENT</b>	<h1>Operating Procedures</h1>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 6</b>	<b>Issue Date: 13.8.21</b>

- Follow these operational procedures for all stages of waste handling.
- Report any incidents or non-conformances to the TCM or Site Manager.
- Ensure site is clean and report any amenity issues to the TCM or Site Manager.
- Ensure correct PPE is worn. Report any issues to TCM or Site Manager.
- Ensure process equipment (picking station) is clean and in good working order. Report any damage or malfunction to TCM or Site Manager.

#### 2.4.4 Mobile Plant Operative Responsibilities

It is the responsibility of Mobile Plant Operatives to:

- Act in accordance with the instruction given to them from the TCM or Site Supervisor.
- Follow these operational procedures for all stages of waste handling.
- Report any incidents or non-conformances to the TCM or Site Manager.
- Check fire extinguisher is in the cabin.
- Ensure mobile plant is checked before use each morning for signs of wear and tear which could compromise health and safety or environmental protection. Use Daily Vehicle Check Form EMS-FR-05 or defect form. All issues noted with equipment or the condition of the site must be reported to the Site Manager immediately, before the equipment is used.
- Switch of plant when not being used and to park in the designated area at the end of each working shift.

#### 2.4.5 Banksman Responsibilities

It is the responsibility of the banksman to:

- Act in accordance with the instruction given to them from the TCM or Site Supervisor.
- Follow these operational procedures for all stages of waste handling.
- Report any incidents or non-conformances to the TCM or Site Manager.
- Ensure the safe manoeuvring of vehicles within and around the site.
- Ensure vehicles leave the site clean and report any issues to the driver to ensure wheels are cleaned before exiting the site.
- Instruct plant operatives to clean working areas as and when required.
- Ensure the dust suppression system is work at the building entrance.

#### 2.4.6 Training

All staff will be trained to a standard which enables them to perform the responsibilities described above and the detailed role as set out in job descriptions.

A record of staff training will be kept for each staff member which includes inductions to new processes and procedures as needed. EMS-FR-03.

The following training matrix will be adopted to guide training needs.

<b>J SIMPSON WASTE MANAGEMENT</b>	<b>Operating Procedures</b>		
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 6</b>	<b>Issue Date: 13.8.21</b>	

<b>Training</b>	<b>TCM</b>	<b>Site Manager</b>	<b>Site Operative</b>	<b>Plant Operative</b>	<b>Banksman</b>
Induction	x	x	x	x	x
Accidents and Emergency	x	x	x	x	x
Fire Prevention	x	x	x	x	x
Amenity Management	x	x	x	x	x
Plant Training	x	x		x	
Daily Checks Plant	x	x		x	
Vehicle marshalling	x	x		x	x
Waste handling	x	x	x	x	
Environmental Permitting	x	x	x	x	x
Complaints and Incidents	x	x	x	x	x
Spillage Procedure	x	x	x	x	x

## **2.5 Site Records**

The TCM is responsible for ensuring the maintenance of site records.

### **2.5.1 Security and Availability of Records**

A record of the types, quantities and dates of wastes deposited on the site will be maintained and provided to the Environment Agency at three-monthly intervals, within one month of the end of each period.

A copy of all records including transfer notes, consignment notes (if necessary) and weighbridge will be maintained in the site office.

### **2.5.2 Site Diary**

The site diary will be maintained and updated to include the following: -

- Start and finish of daily waste management activities on site (operational hours)
- Breakdowns



<b>J SIMPSON WASTE MANAGEMENT</b>	<b>Operating Procedures</b>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 6</b>	<b>Issue Date: 13.8.21</b>

- Technically competent management attendance on site; the date and the time onto site and the time left site
- Weather conditions
- Complaints about site operations and actions taken
- Environmental problems and remedial actions

The site diary will be kept in the site office and updated daily.

## **2.6 Inspection and maintenance**

The Site Management will be responsible for inspecting the storage areas and preventative maintenance will be undertaken according to the Site Inspection Daily Checks Form EMS-FR-04.

Plant and machinery on site is visually inspected by the operator before it is used as part of management of their own risks and health and safety. This is covered in training for staff and operatives. Each driver will complete a defect form which is kept in the cab. The Site Manager records information on the Daily Checks Form EMS-FR-05.

In addition to scheduled preventative maintenance of equipment and machinery, in accordance with legal requirements or manufacturer's recommendations, reactive maintenance will be carried out if needed in accordance with inspection findings. This will be recorded in the site diary.

## **2.7 Complaints**

### **2.7.1 Roles and Responsibilities**

The TCM or Site Manager has the overall responsibility for this procedure.

The administration staff will all be responsible for handling complaints and recording on the correct form. All complaints must be referred to the TCM.

### **2.7.2 Definition**

In this context, a complaint may be received directly from a resident, customer or from a Regulator.

### **2.7.3 Procedure**

When the site receives a complaint, a record is summarised in the Site Diary. Full details will be provided on the incident form, EMS-FR-02.

All staff based in the office will be trained on recording complaints and to make sure they notify the TCM or Site Manager immediately.

The site management will review the activities that may have given rise to the complaint for example noise, dust or litter.

<b>J SIMPSON WASTE MANAGEMENT</b>	<b>Operating Procedures</b>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 6</b>	<b>Issue Date: 13.8.21</b>

The TCM or Site Manager will report the findings to the complainant and implement appropriate corrective action in accordance with a specific management plan or the Operational Procedures.

<b>J SIMPSON WASTE MANAGEMENT</b>	<b>Operating Procedures</b>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 6</b>	<b>Issue Date: 13.8.21</b>

### 3 WASTE HANDLING PROCEDURES

#### 3.1 Pre-Acceptance Procedures

##### 3.1.1 Waste Types

At the time of booking, the customer will be advised of the wastes that are permitted to be deposited within a skip. They will be advised that wastes including asbestos, waste electrical items, fluorescent tubes, gas cylinders, hazardous waste, oils and paints, solvents and tyres, are not permitted to be placed in the skip/container.

Specific Waste Acceptance Procedures for EWC 191212 are provided in Appendix D. Specific Waste Acceptance Procedures for 170904 and classification procedures for wood are provided separately, EMS-WAP170904 AND EMS-WCP-WOOD respectively.

The full list of wastes that could be accepted at this site is provided on Excel Spreadsheet, waste-codes-V1.xlsx. The list includes wastes that are the same in nature those listed below. The acceptability of those wastes will not affect the risk or mitigation required.

The following wastes codes will be accepted and have been assessed in the Risk Assessment, Fire Prevention Plan, Odour Management Plan and Dust Management Plan. For all other wastes (listed in waste-codes-V1.xlsx), the wastes would be accepted with the same controls and same mitigation measures.

<b>EWC Code</b>	<b>Description</b>	<b>Comments</b>
16 01 03	End of Life Tyres	Not routinely accepted, would be stored in container
17 01 01	Concrete	Stored in hardcore bay
17 01 02	Bricks	Stored in hardcore bay
17 01 03	Tiles and ceramics	Stored in hardcore bay
17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06	Stored in hardcore bay
17 02 01	Wood	Stored in correct container/bay
17 02 02	Glass	Unlikely to be received as single waste stream.
17 02 03	Plastic	Stored in container/bay
17 04 01	Copper, bronze, brass	Stored in container/bay
17 04 02	Aluminium	Stored in container/bay
17 04 03	Lead	Stored in container/bay
17 04 04	Zinc	Stored in container/bay
17 04 05	Iron and Steel	Stored in container/bay
17 04 06	Tin	Stored in container/bay

17 04 07	Mixed metals	Stored in container/bay
17 04 11	Cables	Stored in container/bay
17 05 04	Soils and Stones	Whilst this waste code will be accepted, single source is likely to be diverted to other waste sites. Otherwise stored in a separate bay.
17 08 02	Gypsum based construction materials	Stored in container/bay
17 09 04	Mixed construction and demolition wastes other than those mentioned in 170901, 170902 and 170903	Accepted in reception area for processing.
19 12 01	Paper and cardboard	Stored in container/bay
19 12 02	Ferrous metal	Stored in container/bay
19 12 03	Non ferrous metal	Stored in container/bay
19 12 04	Plastic and rubber	Stored in container/bay
19 12 05	Glass	Unlikely to be accepted as a single waste source.
19 12 07	Wood	Stored in container/bay
19 12 08	Textiles	Unlikely to be accepted as a single waste source. If received, would be stored in separate container.
19 12 09	Minerals	Stored in container/bay
19 12 10	Combustibles (RDF)	Processed or transferred on site.
19 12 12	Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 – restricted to residual waste from mechanical treatment at Household, Commercial and Industrial waste transfer/treatment facilities	Received in reception area for processing.
20 01 01	Paper and cardboard	Stored in container/bay
20 01 02	Glass	Not typically accepted as a single waste stream. This would be mixed with general waste.
20 01 08	Biodegradable kitchen and canteen waste	Not routinely accepted at the site. More likely to be mixed with general waste and treated through the process. If received, this will be placed in a dedicated container/bin for off-site removal.

20 01 10	Clothes	Not routinely accepted at the site. More likely to be mixed with general waste and treated through the process.
20 01 11	Textiles	Not routinely accepted at the site. More likely to be mixed with general waste and treated through the process.
20 01 34	Batteries	Any batteries encountered would be removed for secured storage. Not typically accepted as separate waste stream. May be encountered in a skip.
20 01 36	Discarded electrical items	Any WEEE encountered would be stored. Not typically accepted as separate waste stream. May be encountered in a skip.
20 01 38	Wood	Stored in container/bay
20 01 39	Plastics	Stored in container/bay
20 01 40	Metals	Stored in container/bay
20 02 01	Biodegradable waste	This could include green waste. This would be processed to separate waste.
20 02 02	Soil and stones	Whilst this waste code will be accepted, single source is likely to be diverted to other waste sites. Otherwise stored in a separate bay.
20 02 03	Other non-biodegradable waste	Not typically accepted as a single waste stream. This would be mixed with general waste.
20 03 01	Mixed Municipal Waste	This could include general and refurbishment waste. All waste would be received in reception area for processing.
20 03 02	Waste from Markets	Same as above
20 03 07	Bulky Waste	This would include collections from houses or businesses as whole items. For example, furniture. The furniture would be dismantled into component parts and stored as separate items for example wood and metal.

<b>J SIMPSON WASTE MANAGEMENT</b>	<h1>Operating Procedures</h1>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 6</b>	<b>Issue Date: 13.8.21</b>

### 3.2 On Site Waste Acceptance

The driver will arrive at the site and provide Waste Transfer Notes to the site office. The driver will then be directed to the building. The vehicle will be unsheeted once instructed by the banksman. The waste will be visually checked as it is unloaded to ensure that the waste is acceptable.

The driver will then drive out of the building and leave the site. The banksman will check the vehicle wheels before exiting the building and instruct the driver to use the hose and brush if required.

Any incidents of non-conformance will be recorded in the Non-Permitted Waste Form EMS-FR-01 and corrective action taken.

### 3.3 Non-Permitted Waste

If waste arrives on site which is not acceptable under the EPR Permit:

- a) The waste will not be deposited at the site;
- b) The Site Office and Management Team will be informed;
- c) The customer will be informed of the breach and charged for the additional handling costs associated with transferring to another authorised facility;
- d) A Record is maintained of the non-permitted waste, quantity, source, date and client/source of waste.

If waste arrives on site which is tipped then non-permitted wastes are found:

- a) The waste is immediately separated into the quarantine area pending off-site removal
- b) Management Informed of non-permitted waste
- c) The customer will be informed of the breach and charged for the additional handling costs associated with transferring to another authorised facility
- d) Record maintained of non-permitted waste, quantity, source, date and client/source of waste.

### 3.4 Waste Storage

#### 3.4.1 Capacity

The maximum quantity of materials that will be handled per year will be 75,000 tonnes.

The storage limits are set out in Table 2.

<b>J SIMPSON WASTE MANAGEMENT</b>	<b>Operating Procedures</b>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 6</b>	<b>Issue Date: 13.8.21</b>

**Table 2 Storage Limits**

<b>Waste Type</b>	<b>Storage Area</b>	<b>Max. Height</b>	<b>Max. Volume</b>
Reception Area	14x6m 84m <sup>2</sup>	4m	200m <sup>3</sup>
Fines	4m x 8m 32m <sup>2</sup>	3m	60m <sup>3</sup>
Residual (picking line)	4x3m 12m <sup>2</sup>	3m	30m <sup>3</sup>
Wood (picking line)	4x3m 12m <sup>2</sup>	3m	30m <sup>3</sup>
Fines	4x3m 12m <sup>2</sup>	3m	30m <sup>3</sup>
Metals	4x3m 12m <sup>2</sup>	3m	30m <sup>3</sup>
Lights (light weight wastes (paper, plastic)	4x3m 12m <sup>2</sup>	3m	30m <sup>3</sup>
Spare (Container)	4x3m 12m <sup>2</sup>	3m	30m <sup>3</sup>
Spare (Container)	4x3m 12m <sup>2</sup>	3m	30m <sup>3</sup>
Spare (Container)	4x3m 12m <sup>2</sup>	3m	30m <sup>3</sup>
Plasterboard	6x2.4 14.4m <sup>2</sup>	2m	26.9m <sup>3</sup>
Hardcore Bay	5x10m 50m <sup>2</sup>	4m	150m <sup>3</sup>
Residual Storage Bay	12mx4m 48m <sup>2</sup>	4m	130m <sup>3</sup>
Spare	7x6m 42m <sup>2</sup>	4m	100m <sup>3</sup>
Spare	7x6m 42m <sup>2</sup>	4m	100m <sup>3</sup>
Spare	8x9m 72m <sup>2</sup>	4m	150m <sup>3</sup>
Batteries	1x1 1m <sup>2</sup>	1m	1m <sup>3</sup>
Spare Container (for example to store ad-hoc items such as tyres)	6x2.4 14.4m <sup>2</sup>	2m	26.9m <sup>3</sup>

Note: volumes based on stockpiles not uniform block dimensions

The storage bays will be interchangeable, but the volume capacity will be the same. These have been labelled as spare. This use of the bays will be determined by market conditions. There will also be spare storage containers on site for separating different materials. For example, the bays could be used for UPVC, metal and cardboard or other materials.

<b>J SIMPSON WASTE MANAGEMENT</b>	<h1>Operating Procedures</h1>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 6</b>	<b>Issue Date: 13.8.21</b>

Abnormal conditions may exist whereby there are problems with any process phase. In the event of a major failure of the process equipment, the site would cease to accept waste. Any waste being stored would be removed from the site and transferred to another authorised facility. If there is a minor malfunction which can be repaired within 48 hours, the facility would continue to store waste up to the limits set out above. This would equate to the maximum limits managed on site during normal operational conditions. If these limits are reached, no further waste will be accepted until waste treatment has recommenced and the capacity has been restored in the storage bays.

### 3.4.1 Quarantine Area

The site will have visual checks to minimise the incidents of receiving non-compliant waste.

Quarantined waste will be stored in a separate container which will be checked daily. If the wastes are problematic, i.e. biodegradable or odorous, arrangements will be made to remove the container within 48 hours, otherwise arrangements will be made to remove the container on a weekly basis.

### 3.4.2 Fuel

Any fuel on site will be stored in accordance with the Oil Storage Regulations. The fuel will be stored in a bunded tank, capable of storing 110% of the total capacity. The tank will be checked daily as part of the site checks.

All staff will be trained in the safe refuelling of plant.

## 3.5 Waste Treatment

The waste treatment process involves manual and mechanical sorting to separate materials such as wood, metal, cardboard and hardcore.

If the site receives a skip load of an individual waste such as wood. This skip will be emptied to check the entire contents and the waste will then be loaded directly into the bay or container for that material.

Mixed waste will be deposited within the reception area. There will be a visual check to ensure large items are removed from the waste. For example, metal and wood. These will be removed using the mechanical grab/loading shovel and placed in the designated container.

The remaining waste will be loaded into the feed hopper. From here it will progress through a series of stages on a conveyor belt. The first stage is through the trommel screen. This is a rotating drum which is used to break the consistency of the waste and to remove the finer particles. The fines drop into a bay beneath the trommel.

The conveyor continues into a picking station. This is an enclosed operation which manually sorts the waste, removing materials such as wood, metal and residual waste. These items are removed by hand and placed into the chutes which transfer the waste into receiving containers beneath. Depending on market conditions, the waste being picked may change.



<b>J SIMPSON WASTE MANAGEMENT</b>	<h1>Operating Procedures</h1>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 6</b>	<b>Issue Date: 13.8.21</b>

The conveyor will continue to move waste passing an over band magnet to remove metal and then passing a blower which will remove light waste into a receiving container. The remaining material will be hardcore which will continue into a storage bay.

Containers will be provided to store some separated wastes. When a container/bay is 80% full, as checked daily by the site supervisor, arrangements will be made to transfer the load to an authorised recycling facility. A stock of empty containers will be kept on site to provide replacement receptacles for separated materials.

A shredder will be used on site to shred residual waste or wood waste. These will be shredded as separate waste; no mixing will take place. The shredding will allow efficient onward transportation.

There are spare storage bays provided. These may be used to provide additional capacity for wastes such as residual, wood or fines, pending collection.

#### 3.5.1 Waste avoidance, recovery and transfer off site

The operation seeks to maximise the separation of recyclable materials. These will be transferred to specialist facilities for recycling.

### 3.6 Planned Preventative Maintenance

The operation will use the following equipment:

- Trommel Screen
- Conveyor belts
- Overband magnet
- Blower
- Loading Shovel(s)
- Excavator(s)
- Grab loader
- Shredder

A programme of routine planned maintenance will be provided for each item of plant and machinery, as well as the processing equipment in order to prevent breakdown and faults.

All faults which require corrective action will be reported to the Site Manager to be implemented.

The plant and equipment will be subject to service agreements with the manufacturer and/or supplier. Where appropriate, these agreements will include a 24 hour call out facility.

The process equipment will be provided by CRS, a company that specialises in waste processing equipment.

#### 3.6.1 Contingency

To ensure all permitted waste quantities are adhered to, before the processing operation commences the operator will ensure it has:

<b>J SIMPSON WASTE MANAGEMENT</b>	<h1>Operating Procedures</h1>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 6</b>	<b>Issue Date: 13.8.21</b>

- Contacted relevant plant hire companies to source alternative equipment and spare parts if required.
- Created a list of alternative facilities to take the waste.

### **3.7 Routine Cleaning**

The site will be cleaned daily. The cleanliness of the site will be checked as part of the daily site checks. The site will be checked every 2 hours from 8am. This is recorded on the daily check form.

The entire site is concreted.

<b>J SIMPSON WASTE MANAGEMENT</b>	<h1>Operating Procedures</h1>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 6</b>	<b>Issue Date: 13.8.21</b>

## 4 EMISSIONS MANAGEMENT AND MONITORING

### 4.1 Introduction

An Environmental Risk Assessment has been prepared for all operations at the site. These procedures are based on the risks identified in the Risk Assessment. See Appendix A.

### 4.2 Fugitive Emissions to air – dust, mud and litter

Procedures for preventing emissions to air from waste handling.

- All waste will be received, stored and treated within the building.
- Litter picking will be carried out daily.
- Perimeter boundary includes a combination of brick walls, brick buildings, palisade fencing complete with dust netting. The dust netting varies in height from 1.7m to 5m around the site.
- A banksman will be used to assist vehicle manoeuvring and to prevent vehicles from tracking over waste.
- Vehicles leaving the site will be checked and if necessary, a hose and brush will be used to clean the wheels.
- A road sweeper will be deployed as necessary.
- The internal yard will be cleaned daily.
- There will be a more detailed clean weekly, which will include cleaning the process equipment.
- Speed restrictions on site limit dust arising from waste vehicles
- As part of the site daily checks, the Site Manager will check the entire site for evidence of any debris and arrange cleaning as required. Checks will continue every 2 hours.
- Regular cleaning of the site to prevent any waste accumulating at the site.
- Dust suppression will be provided at the door entrance.
- Dust suppression within the building to target key areas.
- The building has been designed with one vehicular access to maintain control within the building.
- Fast acting roller shutter door will be kept closed unless being used for access.

A Dust Management Plan, EMS-OP-05, is provided as a separate report.

### 4.3 Odour

All waste will be unloaded, treated and stored in the building. The building will have one roller shutter door that will be kept closed unless providing access. The following procedures will reduce odour emissions escaping from the site boundary.

- Vehicles will only be unsheeted when ready to discharge.
- Regular cleaning of the site to prevent any waste accumulating at the site.

<b>J SIMPSON WASTE MANAGEMENT</b>	<h1>Operating Procedures</h1>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 6</b>	<b>Issue Date: 13.8.21</b>

- Any waste that is highly odorous will be placed into a lidded container. Arrangements will be made to remove the load within 24 hours. This would include for example black bags that are split and contain odorous waste.
- Any other odorous waste will be placed in the residual waste bay and covered with other waste. This waste will be removed on the next load being removed (which will be every 1-2 days).

It is recognised that some waste codes on the list could be odorous. For example, garden waste and food waste. These wastes will not be routinely accepted but they could either be accepted on an ad-hoc basis or be deposited within a container. This has been addressed in the Odour Management Plan has been prepared EMS-OP-04.

#### **4.4 Noise**

Procedures for preventing noise:

- Vehicles will not be allowed to idle on site and drivers will be requested to turn engines off if they are waiting for inspection or unloading instructions.
- Any complaints from neighbours regarding noise will be dealt with through the Incident Reporting Form and management will be informed.
- All waste handling and treatment will be carried out inside the building.
- The site is in an industrial estate.

A Noise Management Plan has been prepared for the site, EMS-OP-06.

#### **4.5 Fugitive emissions to groundwater**

There will be no fugitive or point source emissions to groundwater.

This section details the procedures for preventing fugitive emissions to groundwater.

- The waste will be stored and treated on an impermeable hardstanding with sealed drainage. The entire site is concreted.
- All fuels stored on site will be bunded.
- All staff will be trained on the Emergency Procedures (EMS-OP-02) and understand the actions to be taken in event of a spill.
- Procedure for checking drainage; this will form part of daily site checks (EMS-FR-04).

#### **4.6 Pests, Vermin and Birds**

A pest contractor will be contracted to assess any infestations and advise on appropriate action.

#### **4.7 Point Source Emissions to air**

There are no point source emissions to air.

#### **4.8 Point Source Emissions to Surface Water**

There will be no point source emissions to surface water.

<b>J SIMPSON WASTE MANAGEMENT</b>	<b>Operating Procedures</b>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 6</b>	<b>Issue Date: 13.8.21</b>

#### **4.9 Point Source Emissions to Foul Sewer**

The waste operation will be carried out within the building which benefits from a sealed drainage system. This comprises a sealed tank which will be emptied by a third party. The tank will be checked daily and when 80% full, arrangements will be made for the tank to be emptied.

There will be no point source emissions to foul sewer.

#### **4.10 Monitoring**

No monitoring is proposed for the operation.

<b>J SIMPSON WASTE MANAGEMENT</b>	<b>Operating Procedures</b>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 6</b>	<b>Issue Date: 13.8.21</b>

## **5 ADDITIONAL MEASURES**

### **5.1 Raw material inputs**

A bunded diesel tank will be provided on site. This will be positioned outside, away from site operations. It will be stored in accordance with the Oil Storage Regulations.

Spillage procedures have been set out in EMS-OP-02. Training will be provided for staff that require use of the diesel tank.

### **5.2 Waste Minimisation Audit**

The operation is primarily waste storage and treatment. The treatment process is specifically designed to recovery waste.

### **5.3 Waste Recovery or Disposal**

The operator will continue to consider making efficiencies in its processes to ensure the diversion of waste from disposal and movement up the waste hierarchy. This will be linked to the Environmental Management System.

### **5.4 Water Use**

Water will be used to provide dust suppression, although this will be minimal. Rainwater will be collected from the roof and stored on site for dust suppression.

No water will be used in the process.

### **5.5 Energy Efficiency**

Energy efficiency measures will be incorporated where possible into the day to day activities of the operations. However, the energy requirements are essential to the continued operation of the installation to prevent pollution and minimise environmental risks.

There are potential energy efficiency improvements to be made including basic energy awareness measures such as energy saving light bulbs, insulation and switching off lights when rooms are not in use. The latter can be applied to all energy-consuming appliances providing that the measure does not compromise safety or essential operating needs.

The operator will ensure the continual improvement of techniques used on site, as well as the long-term monitoring of innovative techniques that appear on the market during the life of the site. These may include further energy efficient measures, potential 'cleaner' fuel options and energy efficient systems for environmental protection.

<b>J SIMPSON WASTE MANAGEMENT</b>	<h1>Operating Procedures</h1>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 6</b>	<b>Issue Date: 13.8.21</b>

## Appendix A: Environmental Risk Assessment

### INTRODUCTION

- 1.1 For this operation, a risk assessment has been undertaken<sup>1</sup>, to assess the risk to local amenity, surface water, air and groundwater. Accidents including fires, vandalism, flooding and road traffic have also been assessed in the Accident Management Plan which is also included in Appendix B.
- 1.2 In order to establish whether there could be harm to the environment or human health, the sources, pathways and receptors need to be identified. The main causes for the release of any contaminants include spillages, leaks and poor management of site operations. The main routes for contaminants will be ground cover, the atmosphere, surface water runoff and groundwater. Vectors such as birds and pests may also act as a pathway.
- 1.3 The nearest residential properties are approximately 125m from the site These are located on Brent Road.
- 1.4 The site is in an industrial estate, surrounded by compatible operations.
- 1.5 In addition, the underlying groundwater also needs to be considered as a receptor. With reference to the Environment Agency data maps, the underlying superficial deposits are unproductive. The bedrock geology is unproductive. There are no Groundwater Source Protection Zones in the vicinity of the site.
- 1.6 The Grand Union Canal is 135m west of the site.
- 1.7 There are no Statutory designations such as SPAs, SACs, SSSIs, Ramsar sites within the vicinity of the site. There are Local Wildlife Sites in the wider area. These are local designations.
- 1.8 Minet Country Park is 275m north of the site.
- 1.9 There are no Scheduled Monuments in the local area.
- 1.10 The site is located within the Royal Borough of Ealing. The entire borough was designated as an Air Quality Management Area for NO<sub>2</sub> (nitrogen dioxide) and PM10 in 2000.
- 1.11 People who are authorised to be on the site are covered specifically by the Health & Safety at Work Act 1974.

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<sup>1</sup> <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit>

<b>J SIMPSON WASTE MANAGEMENT</b>	<b>Operating Procedures</b>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 6</b>	<b>Issue Date: 13.8.21</b>

**Table 1          Nearest Receptors and Sensitivity**

<b>Receptor</b>	<b>Type</b>	<b>Sensitivity</b>	<b>Distance and Direction from Site</b>
Industrial Units Johnson Street	Industrial/Ware house	Low	90m East
International Trading Estate (Brent Park Industrial Estate)	Industrial/Ware house	Low	Surrounding
Industrial Units	Industrial/Ware house	Low	400m West
Industrial Units Western International	Industrial/Ware house	Low	400m South
Grand Union Canal	Surface Water	Medium	135m West 100m North West 120m North
River Crane	Surface Water	High	300m West
Canal Path	Footpath	Low	135m West 100m North West 120m North
Canal Path	Footpath	Low	350m South
Scotts Road/Brent Road	Residential	High	125m South East
Wentworth Road	Residential	High	610m South East
N Hyde Road	Residential	High	800m South West
Guru Nanak Sikh Academy	Education	High	670m North East
Featherstone Primary School	Education	High	530m South East
Minet Country Park	Recreation	Medium	275m North
Local Wildlife site	Ecology	Medium	158m North 115m North West
London Canals	Ecology	Medium	135m West 100m North West 120m North
Deciduous Woodland	Priority Habitat	Medium	158m North 115m North West
Railway	Railway	Low	50m North
A312	Road	Low	350m West

### **Summary**

- 1.12          The risk assessment identifies the likelihood of harm occurring, the consequences and magnitude if harm is caused. The magnitude has been justified based on site specific knowledge.



<b>J SIMPSON WASTE MANAGEMENT</b>	<b>Operating Procedures</b>	
<b>Document Reference: EMS OP 01</b>	<b>Issue Number: 6</b>	<b>Issue Date: 13.8.21</b>

- 1.13 In summary, the assessment shows that the facility can be managed to minimise the risk of harm to human health, the environment and local amenity.

Source	Pathway	Receptor	Harm	Probability of exposure	Consequence	Magnitude of Risk	Justification	Risk Management	Residual Risk
Fugitive release of particulate matter from delivery, treatment and loading	Atmosphere	Local human population	Harm to human health, respiratory irritation and illness	Medium	Medium-High	Medium-High	Permitted waste types do not include dusts, powders or loose fibres but the treatment activities will produce particulate matter, so a medium-high magnitude risk is estimated. There is potential for exposure if anyone is living or working close to the site (apart from the operator and employees)	<p>Waste to be deposited and treated within a building, with a fast acting roller shutter door which will be kept closed unless opened for access.</p> <p>Waste to be stored inside the building.</p> <p>Speed restrictions on site.</p> <p>Visual inspection of dust daily.</p> <p>Daily cleaning of site.</p> <p>Entire site is concreted.</p> <p>Dust suppression to be installed.</p> <p>Dust netting around the site.</p> <p>See Dust Management Plan EMS OP 05</p>	Low

Source	Pathway	Receptor	Harm	Probability of exposure	Consequence	Magnitude of Risk	Justification	Risk Management	Residual Risk
Fugitive release of particulate matter from delivery, treatment and loading	Atmosphere	Local human population	Dust annoyance on cars, clothing and windows of residential properties and/or adjoining businesses	Medium	Low	Low	Local residents and businesses may be sensitive to dust	As above.	Low
Fugitive emissions to water	Water runoff to surface water	Grand Union Canal, River Crane	Harm to surface water quality	Low	Medium	Medium	No direct discharges to adjoining water courses. Distance to the receptors. The permitted wastes do not include liquids.	All waste to be received and treated within the building, with concrete hardstanding and sealed drainage. Daily checks to ensure concrete remains intact Daily checks of drainage system. Spillage procedure. Any fuels will be stored in accordance with Oil Storage Regulations.	Low
Fugitive emissions to water	Water runoff to ground	Groundwater	Harm to groundwater quality	Low	Low	Low	The permitted wastes do not include liquids. Underlying	All waste to be received and treated within the building, with concrete	Low

Source	Pathway	Receptor	Harm	Probability of exposure	Consequence	Magnitude of Risk	Justification	Risk Management	Residual Risk
							geology is unproductive.	hardstanding and sealed drainage. Daily checks to ensure hard standing remains intact. Spillage Procedure	
Noise from plant and machinery	Atmosphere	Local human population	Nuisance to neighbours	Medium	Medium	Medium	Residents often sensitive to noise and vibration	Waste treatment operations to take place within the building, with one fast acting roller shutter door. All plant and machinery to be maintained in accordance with manufacturers specifications Complaints procedure is in place. Distance and intervening topography will minimise any direct noise impact. See Noise Management Plan EMS OP 06	Low
Odour	Atmosphere	Local human population	Nuisance to neighbours	Low	Low	Low	The operator does not handle waste that is typically odorous.	Regular cleaning of site. Any odorous waste will be containerised, and arrangements made to move off-site. Daily Site checks. See Odour Management Plan EMS OP 04	Very Low

Source	Pathway	Receptor	Harm	Probability of exposure	Consequence	Magnitude of Risk	Justification	Risk Management	Residual Risk
Pests, Vermin, Birds	Atmosphere	Local human population	Nuisance to neighbours	Low	Low	Low	Permitted wastes may attract scavenging animals and birds.	Waste to be received and treated within the building. Separated materials will be stored in containers/bays inside. Daily Site Inspections. Commission Pest Control Contractor if necessary.	Low
Litter	Atmosphere	Local human population	Nuisance to neighbours	Low	Medium	Low-Medium	The incoming loads could contain lightweight wastes. Residents often sensitive to litter.	Waste to be received and treated within the building. Separated materials will be stored in containers/bays inside. Vehicles carrying waste will be sheeted when arriving and leaving the site. Dust netting and walls provide contained operational area. Daily Site Inspections Implement litter picking duties as necessary.	Low

Source	Pathway	Receptor	Harm	Probability of exposure	Consequence	Magnitude of Risk	Justification	Risk Management	Residual Risk
Mud on Road	Tracked on vehicle wheels	Local human population	Nuisance to neighbours	Medium	Medium	Medium	Local businesses may be sensitive to mud on road.	All vehicles to be checked before leaving the site. Daily Site Inspections Deploy road sweeper if necessary.	Low
Any	Surface water runoff or atmosphere Local Wildlife Site, Minet Country Park, London Canals, Deciduous Woodland	Local Wildlife Site, Minet Country Park, London Canals, Deciduous Woodland	Harm to protected site through toxic contamination, nutrient enrichment, smothering, disturbance, predation	Medium	Medium	Medium	Waste operations may cause harm to and deterioration of Local Wildlife Sites and Priority Habitats. These sites are separated from the permitted site by a large warehouse and mainline railway. Plus a new road being constructed.	All of the controls above.	Lpw
Receipt of Hazardous waste in loads	Air, surface water, tracked on vehicles,	All of the above	Harm to human health, harm to water, harm to ecosystems	Low	High	Medium	The site will not accept hazardous waste.	Waste Acceptance Procedures will be implemented to check incoming waste. Waste producers will be required to classify waste subject to the procedures. Any	Low

Source	Pathway	Receptor	Harm	Probability of exposure	Consequence	Magnitude of Risk	Justification	Risk Management	Residual Risk
								hazardous waste encountered would be subject to rejection procedure. All waste managed inside the building to minimise risk	

## Appendix B: Accident Risk Management Plan

Event	Likelihood of Occurrence	Consequence of Occurrence	Actions Taken or Proposed to Minimise the Likelihood or Consequences of Occurrence	Actions Planned if the Event Does Occur
Flooding based on Environment Agency indicative floodplain maps	Low. Site is located within Flood zone 1.	N/A	N/A	N/A
Minor fires associated with machinery	Unlikely and infrequent given waste types handled	Damage or injury from minor fires would be minimal with long term effect unlikely	Fire fighting equipment to be stored on site and implement fire action plan Regular maintenance of plant and machinery. Implement Emergency Procedures relating to Fire	Fire Prevention Plan EMS-OP-03
Fires associated with storage of fuel	Unlikely and infrequent given quantities stored	Damage or injury could be significant based on nature of material.	Fire fighting equipment to be stored on site Implement Emergency Procedures relating to Fire	Fire Prevention Plan EMS-OP-03
Fires caused by arson and/or vandalism	Unlikely and infrequent	Damage or injury from minor fires would be minimal with long term effect unlikely	Fire fighting equipment to be stored on site Implement Emergency Procedures relating to Fire There is CCTV and a security guard provided for out of hours.	Fire Prevention Plan EMS-OP-03
Minor spillage caused by machinery and fuel/oil leaks from vehicles	Unlikely and infrequent	No pathway to surface water or groundwater. Localised spillage would be minimal with long term effect unlikely	Spill kits maintained in site office. Vehicle manoeuvring will be controlled. Regular maintenance of plant and machinery Implement Emergency Procedures relating to Spillages	Contingency Procedures EMS-OP-02
Explosions	Very Unlikely	Damage to People, atmosphere, buildings	Waste Acceptance Procedures to ensure compliance with permitted wastes. The site is a no smoking facility.	Call Emergency Services



## **Appendix C - Permitted Wastes**

See excel spreadsheet - waste-codes-V1.xlsx

## **Appendix D – Waste Acceptance Procedures for EWC 191212**

### **Roles and Responsibilities**

The Technically Competent Manager has responsibility for ensuring these procedures are adhered to which includes communication with staff and customers, and the provision of adequate training.

The Technically Competent Manager is responsible for updating and re-issuing these procedures as necessary and ensuring all staff are trained in new procedures.

### **Purpose**

The purpose of these procedures is to provide the Waste Acceptance Procedures for receiving 191212. This will allow the operator to receive and treat waste generated at other waste management facilities.

19 12 12 Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 – restricted to residual waste from mechanical treatment at Household, Commercial and Industrial waste transfer/treatment facilities

This EWC code is a 'mirror entry' and requires a waste assessment prior to removal from the place of production.

### **Pre-Acceptance Waste Procedure**

To control the quality and quantity of waste inputs to the site only selected approved suppliers' will be permitted to transfer this waste to the site. As part of the approval process, JSWM will request a copy of the Environmental Permit and Waste Acceptance Procedures from the waste management facility producing EWC191212. This will help to demonstrate that the producer is a) not managing hazardous waste and b) has procedures in place to prevent hazardous waste being accepted at their site.

JSWM will require all operators that want to transfer 191212 to the site, classify their waste in accordance with WM3. This will ensure all parties meet their duty of care requirements for correctly classifying waste.

The objective of this procedure is to correctly classify 191212 to ensure that only non-hazardous waste is accepted at the site.

WM3 Guidance provides the testing requirements for producers to classify the waste. This will involve chemical testing at an accredited laboratory. Once the laboratory certificates have been issued, the waste producer will be expected to provide a waste classification assessment using the HazWasteOnline tool. The producer will provide the analysis certificates to JSWM which will include the non hazardous waste classification.

The TCM at JSWM will check the paperwork and a record will be kept for each customer.

### **On-Site Checks**

The driver will arrive at the site and provide Waste Transfer Notes to the site office. The driver will then be directed to the building. The vehicle will be unsheeted once instructed by the banksman. The waste will be visually checked as it is unloaded to ensure that the waste is acceptable.

The driver will then drive out of the building and leave the site. The banksman will check the vehicle wheels before exiting the building and instruct the driver to use the hose and brush if required.

Any incidents of non-conformance will be recorded in the Non-Permitted Waste Form EMS-FR-01 and corrective action taken.

### **Non-Permitted Waste**

If waste arrives on site which is not acceptable under the EPR Permit:

- a) The waste will not be deposited at the site;
- b) The Site Office and Management Team will be informed;
- c) The customer will be informed of the breach and charged for the additional handling costs associated with transferring to another authorised facility;
- d) A Record is maintained of the non-permitted waste, quantity, source, date and client/source of waste.

If waste arrives on site which is tipped then non-permitted wastes are found:

- e) The waste is immediately separated into the quarantine area pending off-site removal
- f) Management Informed of non-permitted waste
- g) The customer will be informed of the breach and charged for the additional handling costs associated with transferring to another authorised facility
- h) Record maintained of non-permitted waste, quantity, source, date and client/source of waste.
- i)

### **Records**

JSWM will maintain copies of the waste acceptance procedures including:

- Copy of the Producer's Environmental Permit and Waste Acceptance Procedures.
- Laboratory test certificates
- Classification
- Waste Transfer Notes
- Any non-compliances

<b>J SIMPSON WASTE MANAGEMENT</b>	<b>Waste Acceptance Procedures</b>	
Document Reference: EMS-WAP170904-01	Issue Number: 1	Issue Date: 2.8.2021

## 1 Introduction

### 1.1 Roles and Responsibilities

The Technically Competent Manager has responsibility for ensuring these procedures are adhered to which includes communication with staff and customers, and the provision of adequate training.

The Technically Competent Manager is responsible for updating and re-issuing these procedures as necessary and ensuring all staff are trained in new procedures.

### 1.2 Purpose

The purpose of these procedures is to provide the Waste Acceptance Procedures for receiving waste coded as EWC 170904. This waste code is used for waste placed in a skip/container from construction projects. It could contain a mixture of soils, hardcore, wood, plastic, metal, garden waste, UPVC for example.

EWC 170904 – mixed construction and demolition wastes other than those mentioned in 170901, 170902 and 170903.

This EWC code is a ‘mirror entry’ and requires classification to ensure that the waste does not contain dangerous substances.

### 1.3 Pre-Acceptance Waste Procedure

To control the quality and quantity of waste inputs to the site the waste producer must describe the waste being collected at the time of order. JSWM will clarify the nature of the waste with the producer to help the classification. Skip waste can comprise a mixture of components and depending on the nature producing the waste may be coded as follows:

170407	Mixed Metal
170904	Mixed Construction Waste
200301	Mixed Municipal Waste
200307	Bulky Waste
150106	Mixed Packaging

Mixed waste from household or office/commercial premises will be coded EWC 200301 Mixed Municipal Waste. This could include a regular exchange to collect mixed loads of paper, metal, cardboard, and plastic.

Waste from office/commercial refurbishment projects may be EWC 200301 Mixed Municipal Waste or 200307 Bulky Waste. The mixed municipal waste EWC200301 could include carpets, textiles, plastic packaging, cardboard, wood and metal.

If a skip contains large furniture items from a clearance (wardrobes, mattresses, cupboards, tables, chairs etc), this would be EWC 20307 bulky waste.

<b>J SIMPSON WASTE MANAGEMENT</b>	<b>Waste Acceptance Procedures</b>	
<b>Document Reference: EMS-WAP170904-01</b>	<b>Issue Number: 1</b>	<b>Issue Date: 2.8.2021</b>

There may be occasions when the load contains single types of waste, in which case the appropriate single waste stream code will be used as follows :

150101	Paper and cardboard packaging
150102	Plastic packaging
150103	Wooden packaging
150104	Metallic packaging
150105	Composite packaging
150107	Glass packaging
150109	Textile packaging
170201	Wood
170202	Glass
170203	Plastic
170401	Copper, bronze, brass
170402	Aluminium
170403	Lead
170404	Zinc
170405	Iron and Steel
170406	Tin
191201	Paper and cardboard
191202	Ferrous Metal
191203	Non Ferrous Metal
191204	Plastic and rubber
191205	Glass
191207	Wood
191208	Textiles
200101	Paper and cardboard
200102	Glass
200139	Plastics
201040	Metals

For mirror entry codes, the waste producer must classify the waste to assign the correct EWC code. JSWM will advise the customer at the point of instruction about the different codes.

For mixed construction waste EWC 170904, the following checks will be made.

#### Waste Acceptance Procedure EWC 170904

If the producer of the waste is a builder involved in construction work, the mixed waste generated will be coded EWC 170904. From experience, the waste typically comprises mixtures of plastics, metal, bricks and concrete. These wastes have separate absolute non-hazardous EWC code entries, the placement of these wastes into one container does not alter the nature of the waste. The risk may arise when soils are also included in the container.

Wherever possible, arrangements will be made to separate soils on development sites. It is recognised by JSWM that for projects which are space limited, soils will be placed in the same container as other waste streams.

<b>J SIMPSON WASTE MANAGEMENT</b>	<b>Waste Acceptance Procedures</b>	
Document Reference: EMS-WAP170904-01	Issue Number: 1	Issue Date: 2.8.2021

For most domestic projects, the waste soils will be naturally occurring from excavating foundations.

For some projects, the waste may be generated from demolishing garages or parking areas, for which there could be a risk associated with contaminated hydrocarbons or asbestos roofing.

At the time of booking the skip, JWSM will establish the nature of the waste being generated. If there is any likelihood of contamination soils being placed in the container, JSWM will request analysis.

For large developments (i.e., those that require planning permission), a representative from JSWM will visit the site to assess the background of the property and advise on appropriate segregation and storage. Developments which require planning permission are likely to have produced a Site Investigation Report. This will be requested by JSWM and reviewed for the recommendations on ground conditions.

WM3 Guidance provides the testing requirements for producers to classify the waste. This will involve chemical testing at an accredited laboratory. Chemical testing will only be required for the following scenarios:

- Development which required planning permission and the Soil Investigation Report identified a risk of contamination
- Mixed skips loads which contain at least 50% fine material and the producer has confirmed the fine material is not naturally occurring from excavations

Once the laboratory certificates have been issued, the waste producer will be expected to provide a waste classification assessment using the HazWasteOnline tool. The producer will provide the analysis certificates to JSWM which will include the non-hazardous waste classification.

The TCM at JSWM will check the paperwork and a record will be kept for each customer.

#### **1.4 On-Site Checks**

The driver will arrive at the site and provide Waste Transfer Notes to the site office. The driver will then be directed to the building. The vehicle will be unsheeted once instructed by the banksman. The waste will be visually checked as it is unloaded to ensure that the waste is acceptable.

The driver will then drive out of the building and leave the site. The banksman will check the vehicle wheels before exiting the building and instruct the driver to use the hose and brush if required.

Any incidents of non-conformance will be recorded in the Non-Permitted Waste Form EMS-FR-01 and corrective action taken.

<b>J SIMPSON WASTE MANAGEMENT</b>	<b>Waste Acceptance Procedures</b>	
Document Reference: EMS-WAP170904-01	Issue Number: 1	Issue Date: 2.8.2021

### **1.5 Non-Permitted Waste**

If waste arrives on site which is not acceptable under the EPR Permit:

- a) The waste will not be deposited at the site;
- b) The Site Office and Management Team will be informed;
- c) The customer will be informed of the breach and charged for the additional handling costs associated with transferring to another authorised facility;
- d) A Record is maintained of the non-permitted waste, quantity, source, date and client/source of waste.

If waste arrives on site which is tipped then non-permitted wastes are found:

- a) The waste is immediately separated into the quarantine area pending off-site removal
- b) Management Informed of non-permitted waste
- c) The customer will be informed of the breach and charged for the additional handling costs associated with transferring to another authorised facility
- d) Record maintained of non-permitted waste, quantity, source, date and client/source of waste.

### **1.6 Records**

JSWM will maintain copies of the waste acceptance procedures including:

- A copy of any site investigation report.
- Laboratory test certificates
- Classification
- Waste Transfer Notes
- Any non-compliances

<b>J SIMPSON WASTE MANAGEMENT</b>	<b>Waste Classification Procedures WOOD</b>	
<b>Document Reference: EMS-WCP-WOOD</b>	<b>Issue Number: 1</b>	<b>Issue Date: 11.8.2021</b>

## 1 Introduction

### 1.1 Roles and Responsibilities

The Technically Competent Manager has responsibility for ensuring these procedures are adhered to which includes communication with staff and customers, and the provision of adequate training.

The Technically Competent Manager is responsible for updating and re-issuing these procedures as necessary and ensuring all staff are trained in new procedures.

J Simpson Waste Management (JWSM) will train all staff in these procedures.

### 1.2 Purpose

The purpose of these procedures is to provide the Waste Classification Procedures for waste wood. The procedures have been based on the Waste Wood Assessment Guidance (WRA July 2021).

Wood is categorised as follows. This will be used as the baseline to help classification.

#### Grade A (clean, untreated)

“Clean” recycled wood – material produced from pallets and secondary manufacture etc and suitable for producing animal bedding and mulches.

#### Grade B (treated and non-hazardous)

Industrial feedstock grade – including grade A material plus waste wood sourced from construction and demolition activities, transfer stations, household waste sites and the manufacture of furniture from solid wood.

This grade is suitable for panel board manufacturing

#### Grade C (treated and non-hazardous)

Fuel grade – this is made from all of the above material from similar sources but will typically consist of panel board, MDF and plywood.

Grade C is suitable for as biomass fuel at Waste Incineration Directive compliant facilities.

#### Grade D (hazardous)

Hazardous waste – This includes all grades of wood including treated material such as fencing and trackwork and requires disposal at special facilities. This includes wastes that had copper, chrome, arsenic (CCA) treatment or creosote applied.

The site can receive waste wood from construction and domestic properties, as well as from other waste sites. Waste wood EWC codes are mirror entry and therefore classification is required. The following waste codes are relevant.



<b>J SIMPSON WASTE MANAGEMENT</b>	<b>Waste Classification Procedures WOOD</b>	
<b>Document Reference: EMS-WCP-WOOD</b>	<b>Issue Number: 1</b>	<b>Issue Date: 11.8.2021</b>

- 170201 Wood from construction and demolition site
- 170204\* Wood containing or contaminated with dangerous substances
- 191206\* Wood containing dangerous substances
- 191207 Wood other than that mentioned in 191206
- 200137\* Wood containing dangerous substances
- 200138 Wood other than that mentioned in 200137

Wood may also be delivered in mixed loads.

This procedure has been prepared to take account of RPS250 Hazardous Waste Wood from Demolition and Refurbishment Activities<sup>1</sup>. This allows waste sites to store hazardous waste wood for a temporary period to allow testing to be established and possibly time to vary the permit to accept the hazardous wood waste codes.

It does not apply to Grade D wood, which includes railway sleepers, telegraph poles, waste wood from hydraulic engineering, waste wood from industrial applications such as cooling tower timbers, waste wood from boats, waste wood treated with creosote. These will remain hazardous waste and must be transferred to a site that is permitted to receive these wastes.

The majority of waste wood from mixed sources such as demolition sites and skips is non-hazardous. A small proportion may be potentially hazardous, this is dependent on the age that the wood may have been treated or recoated with creosote. Typical uses are as follows:

Use class	Type	Examples
1	Internal use with no risk of wetting	floorboards, timber in wall partitions, skirting, doors, frames, stairs and furniture
2	Internal use with risk of wetting	Roof timbers, ground floor joists, timber joists
3	External	Windows, doors, roof soffits, fascias, bargeboards, cladding, fence rails and boards
4	Timbers in permanent contact with water or ground	Fence posts, gravel boards, retaining walls, playground equipment, decking

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<sup>1</sup> Published 23 July 2021

<b>J SIMPSON WASTE MANAGEMENT</b>	<b>Waste Classification Procedures WOOD</b>	
<b>Document Reference: EMS-WCP-WOOD</b>	<b>Issue Number: 1</b>	<b>Issue Date: 11.8.2021</b>

Softwood timber used for Class 1 is unlikely to have been treated. Softwood used for classes 2-4 is likely to have been treated. Hardwood used for any use would not have been preservative treated.

The composition of preservatives has changed since their first use in the 1950's, phasing out some of the earlier hazardous chemicals used. Most preservatives used on wood for internal and some external uses are now non-hazardous. With reference to the WRA report, creosote is the only preservative still being used (from 2016 onwards).

The preservatives used for external joinery were likely to contain hazardous components on materials supplied between 1950-2007.

The latest research shows that only decking and fence posts from household wood waste, and structural timbers, roof tiling battens and external joinery from pre-2007 buildings within demolition waste, were of concern with regards to containing hazardous content.

### **1.3 Pre-Acceptance**

The operator will work with customers to segregate hazardous waste wood from non-hazardous waste at the point of production. It is accepted that some producers will not be able to do this either through lack of space or resources.

Producers are responsible for classifying waste. JSWM will work with those producers to identify the wastes that are most likely to contain hazardous materials, namely:

- Decking and fence posts
- Structural Timbers
- Roof Tiling Battens
- External joinery (on properties constructed between 1950-2007)

At the time of booking, JSWM will request an approximate age of the property as this will provide an indication on the type of joinery used.

Any waste inquiries from farms will be questioned regarding the nature and type of wood being generated. If there is any doubt about the nature of the waste wood, it will be assumed hazardous unless it has been assessed.

Railway sleepers, telegraphs poles, foundry moulds, panels treated with PCBs, waste wood from old boats and wagons and cooling towers will not be knowingly accepted at the site.

Wooden packaging (pallets) will be checked to make sure that they do not contain any codes. Any pallets coded MB (Methyl Bromide) will be treated as hazardous. All other pallets will be received as non-hazardous.

### **1.4 On-Site Checks**

For waste wood received at the site, JSWM will use their knowledge to separate any obvious hazardous waste wood from the non-hazardous waste. JSWM will use the Categories of Waste Wood set out in the guidance to help classify the waste wood.

<b>J SIMPSON WASTE MANAGEMENT</b>	<b>Waste Classification Procedures WOOD</b>	
<b>Document Reference: EMS-WCP-WOOD</b>	<b>Issue Number: 1</b>	<b>Issue Date: 11.8.2021</b>

If space is available at any given time, a separate container will be provided to store suspected hazardous waste wood.

The driver will arrive at the site and provide Waste Transfer Notes to the site office. The site office will check the load against any pre-acceptance checks. If this process confirms that the age of the property from which the waste was sourced pre-dates 2007, the TCM will notify the site operatives as a notification that the load could contain hazardous waste wood.

The driver will then be directed to the building. The vehicle will be unsheeted once instructed by the banksman. The waste will be visually checked as it is unloaded to ensure that the waste is acceptable.

At this time the TCM may decide to dual code the waste if the load contains wood that appears to be hazardous (creosote coating, or other type of preservative). If possible, this waste will be placed in a separate container. If that is not practicable, the waste will be placed in the Grade C storage bay.

### **1.5 On-Site Processing**

There is a separate storage bay for Grade C wood. The incoming wood waste will be visually checked and for any wood where there is an indication of contamination it will be stored in a separate container, where space allows. Otherwise, it will be mixed in the bay and a record made that it contains hazardous waste.

The categories of waste wood will be used to help this process.

When the waste wood is being removed from a site, the TCM will estimate the percentage of waste that is hazardous to provide a dual code on the Consignment Note.

If there is any doubt about the nature of the wood, a sample will be sent to a laboratory for analysis to confirm the classification. Samples will be taken from a complete cross section of the wood as the treatment concentration may vary.

The laboratory will test for the following:

- Total metals suite, which must include in Arsenic (As), Copper (Cu), Chromium (Cr), Zinc (Zn), Lead (Pb) and Tin (Sn)
- Where Tin (Sn) is confirmed from the total analysis as above 25mg/kg, it should be considered to be in the form Tributyltin, and therefore tested for Tributyltin Oxide or Tributyltin Naphthenate
- Dieldrin
- Lindane
- Permethrin
- Pentachlorophenol (PCP)

In the absence of testing, the wood will be classified as hazardous, and a percentage split recorded accordingly.

The following codes will be used for the wood waste removed from the site;

<b>J SIMPSON WASTE MANAGEMENT</b>	<b>Waste Classification Procedures WOOD</b>	
<b>Document Reference: EMS-WCP-WOOD</b>	<b>Issue Number: 1</b>	<b>Issue Date: 11.8.2021</b>

- 170201 Waste Wood not containing dangerous substances
- If the load contains some hazardous waste the WTN will be completed as follows:  
170201 / 170204\* waste wood/waste wood containing dangerous substances 95%/5%  
(split shown as example only)
- If a container has been used to store hazardous waste wood only, it will be coded as  
170204\* waste wood containing dangerous substances
- If the wood has been shredded, the following codes will be used
  - 191206\* Wood containing dangerous substances
  - 191207 Wood other than that mentioned in 191206

For the waste that is shredded, the wood can contain a mixture of non-hazardous and hazardous waste wood. Samples of the mixed wood will be analysed as above to confirm it meets the non-hazardous waste limits. This mix load can then be transferred using a waste transfer note to an Industrial Emissions directive Chapter VI compliance biomass plant or to a panel board manufacturer.

## **1.6 Training**

JSWM will train staff to understand these procedures. The Wood Recycling Association's guidance document will be used as training tool to help identify the different categories of waste wood

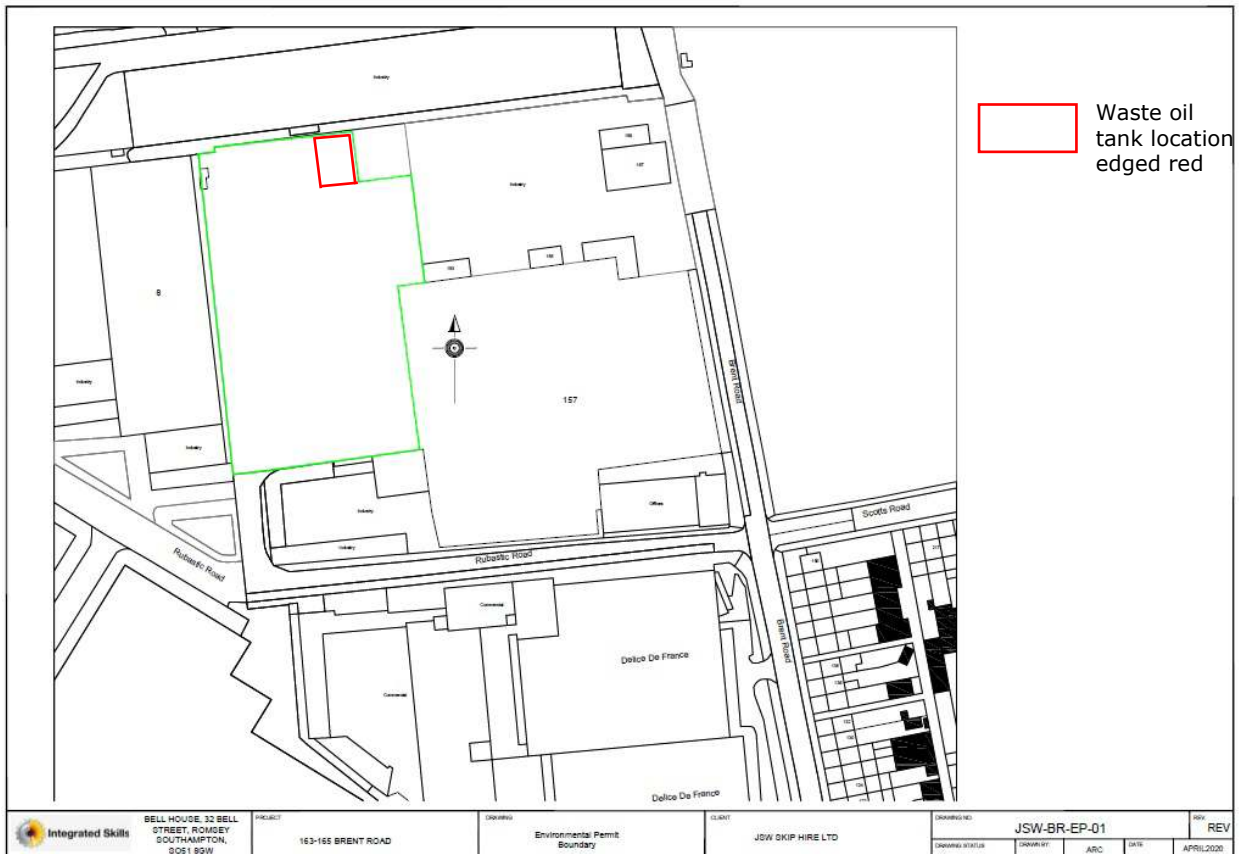
## **1.7 Records**

JSWM will maintain copies of the waste acceptance procedures including:

- Classification
- Waste Transfer Notes
- Waste Consignment Notes

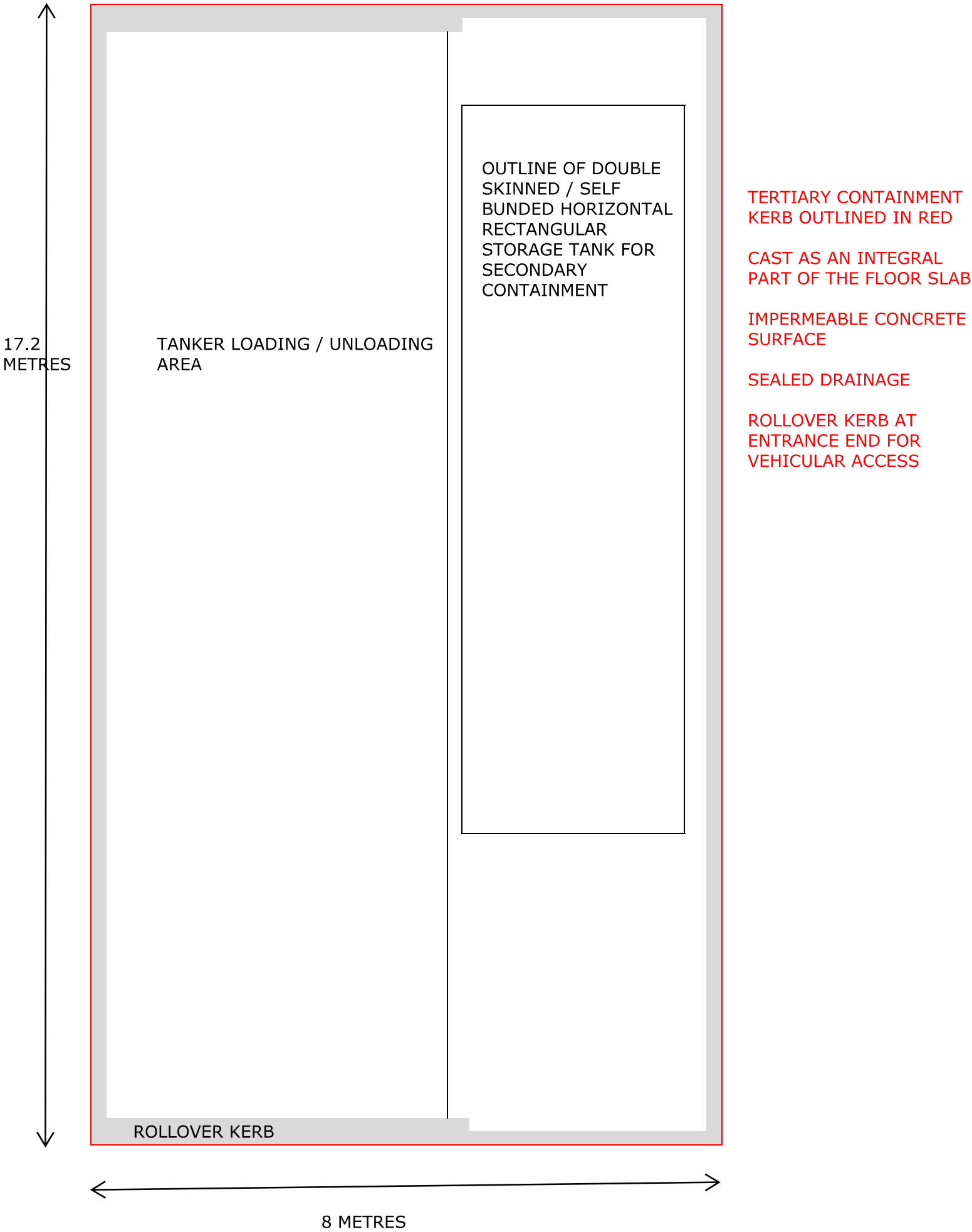
# C2 Q5a

Plans, drawings, process flow diagrams

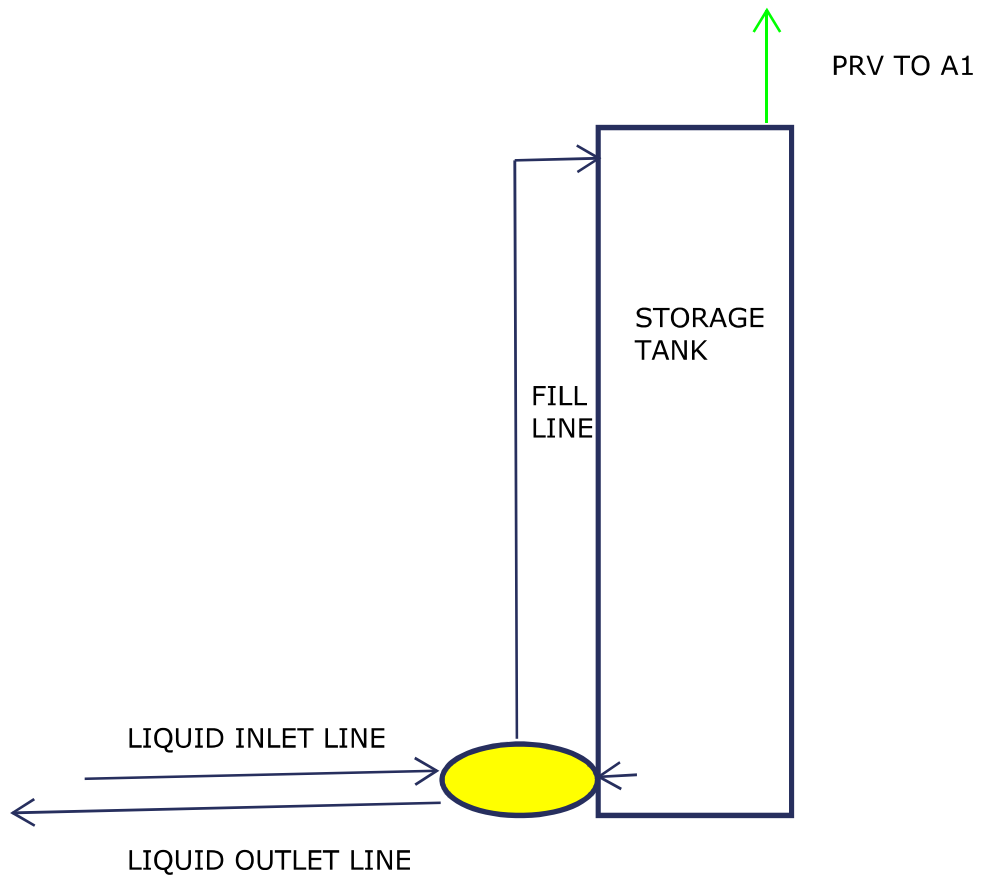


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# TERTIARY CONTAINMENT AREA AND TANK LOCATION



PROCESS FLOW DIAGRAM



NOTE: YELLOW OVAL SIGNIFIES 3 WAY VALVE TO ENABLE TANK FILLING AND TANK EMPTYING. ONLY THE 'PRV' - PRESSURE RELIEF VALVE CONNECTS TO THE A1 VENT / EMISSION POINT.

## Non-technical summary

### **C2 Q5c**

This variation application considers the regulation of the temporary storage of hazardous waste oils. The waste operation will involve the bulk storage of waste oils with secondary and tertiary containment for transfer for recovery and recycling elsewhere. No treatment of the waste will be facilitated at the site.

The new kerbed vehicle loading / unloading area will be adjacent to the single self-bunded steel storage tank.

Emissions to air from the tank will only occur during transfer, being caused by the displacement of the air within the tank. The displaced air will include some volatile organic compounds (VOCs) from the oil. Emissions to air will be de minimis.

Surface water will accumulate in the kerbed unloading area and the submersible pump will be manually activated when required to discharge the clean surface water via an interceptor to the existing surface water drains. In the event of a spillage contaminating the surface water in the unloading area, this contaminated water will be removed from the Site along with any cleaning liquids, to a third party permitted disposal site.

The storage tank will have a total capacity less than 50 tonnes.

Annual hazardous waste throughput – 3,500 tonnes

The waste oil storage tank is double bunded / self-bunded, designed as one operational tank with an internal overflow into the outer surrounding steel bund. A high-level alarm would sound before any overflow from the internal tank to the outer bund tank. As the internal 57,000 litre tank is an integral part of the larger outer tank, the total capacity is 63,000 litres and the secondary containment is, therefore, equivalent to 110% of the operational tank. Fill and discharge points are double valved and located over drip trays inside a cabinet positioned on the end of the tank. All drips and spillages are cleared away immediately or at the end of the transfer. The double bunded tank is located inside a kerbed concrete base to provide tertiary containment. This storage arrangement complies with CIRIA 736 guidance.

Typical photographs of this double bunded tank design are shown below:





# Environmental Risk Assessment

## C2 Q6

The scope of the permit and associated rules is defined by the following risk criteria:

- Parameter 1 Permitted activities - The storage of waste prior to recovery or disposal elsewhere (R13 or D15)  
 Parameter 2 Permitted waste types - Hazardous waste oils  
 Parameter 3 Quantity of waste accepted at the facility: max 3000 tonnes per annum.  
 Parameter 4 Quantity of waste stored at any one time: 50 tonnes  
 Parameter 5 All waste shall be stored on an impermeable surface within a bunded area  
 Parameter 6 The only point source discharges to controlled waters are surface water from areas of the facility used for loading / unloading vehicles.  
 Parameter 7 No groundwater source protection and not within 50 metres of any well, spring or borehole used for the supply of water for human consumption  
 Parameter 8 The activities shall not be carried out within 200 metres of a European Site (candidate or Special Area of Conservation, proposed or Special Protection Area or Ramsar site) or a Site of Special Scientific Interest (SSSI).

Data and information				Judgement				Action (by permitting)	
Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).
Local human population.	Waste, litter and mud on local roads.	Nuisance, loss of amenity, road traffic accidents.	Vehicles entering and leaving site.	Low	Medium	Low	Activities unlikely to give rise to litter, debris or mud.	Emissions of substances not controlled by emission limits	Low
Local human population.	Odour	Nuisance, loss of amenity.	Air transport then inhalation.	Low	Low	Low	Local residents often sensitive to odour but oil is not particularly odorous and is stored in tanks.	Odour condition requires emissions to be free from odour at levels likely to cause pollution outside the site - an odour management plan is required in the unlikely event of an odour problem.	Low
Local human population.	Noise and vibration.	Nuisance, loss of amenity, loss of sleep or harm.	Noise through the air and vibration through the ground.	Low	Medium	Low	Local residents often sensitive to noise and vibration but no heavy plant used in this activity.	Emissions shall be free from noise and vibration and a noise and vibration management plan is required where necessary.	Low

Local human population and local environment.	Flooding of site.	If waste is washed off site it may contaminate buildings / gardens / natural habitats downstream.	Flood waters.	Low	Medium	Medium	Oils are potentially polluting but stored with secondary and tertiary containment	Management system required to identify and minimise risks including those from accidents.	Low
Local human population and local environment.	Fire risk from stockpiles, arson and / or vandalism causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff, firefighters or arsonists/vandals. Pollution of air, water or land.	Air transport of smoke. Spillages and contaminated firewater by direct run-off from site and via surface water drains and ditches.	Low	Medium	Medium	Oils have high flashpoint greater than 66 C and stored in tanks but would release noxious fumes and smoke if ignited.	Management system required to identify and minimise risks from operations - to include fire and security.	Low
Local human population and / or livestock after gaining unauthorised access to the waste operation.	All on-site hazards: wastes; machinery and vehicles.	Bodily injury.	Direct physical contact.	Low	Medium	Medium	Permitted waste types are hazardous but stored in tanks therefore only a medium magnitude risk is estimated.	Management system required to identify and minimise risks from operations - to include security.	Low
Local human population and local environment.	Accidental fire causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff or firefighters. Pollution of water or land.	As above.	Low	Medium	Medium	Oils have high flashpoint ~150 C and stored in sealed containers but would release noxious fumes and smoke if ignited.	Management system required to identify and minimise risks from operations - to include fire.	Low
All surface waters close to and downstream of site.	Spillage of liquids, contaminated rainwater run-off.	Acute effects; oxygen depletion, fish kill and algal blooms.	Direct run-off from site across ground surface, via surface water drains, ditches etc.	Medium	Medium	Medium	Oils could be spilled during transfer/bulking operations leading to direct contamination of surface waters but these would be contained.	All areas of the site used for storage of oil in tanks of oil shall be provided with an impermeable surface and bunding. No point source emissions to water. Require emissions management plan if activities give rise to pollution.	Low
All surface waters close to and downstream of site.	As above	Chronic effects; deterioration of water quality.	As above. Indirect run-off via the soil layer.	Medium	Medium	Medium	Oils could be spilled during transfer/bulking operations leading to direct contamination of surface waters but these would be contained.	As above	Low

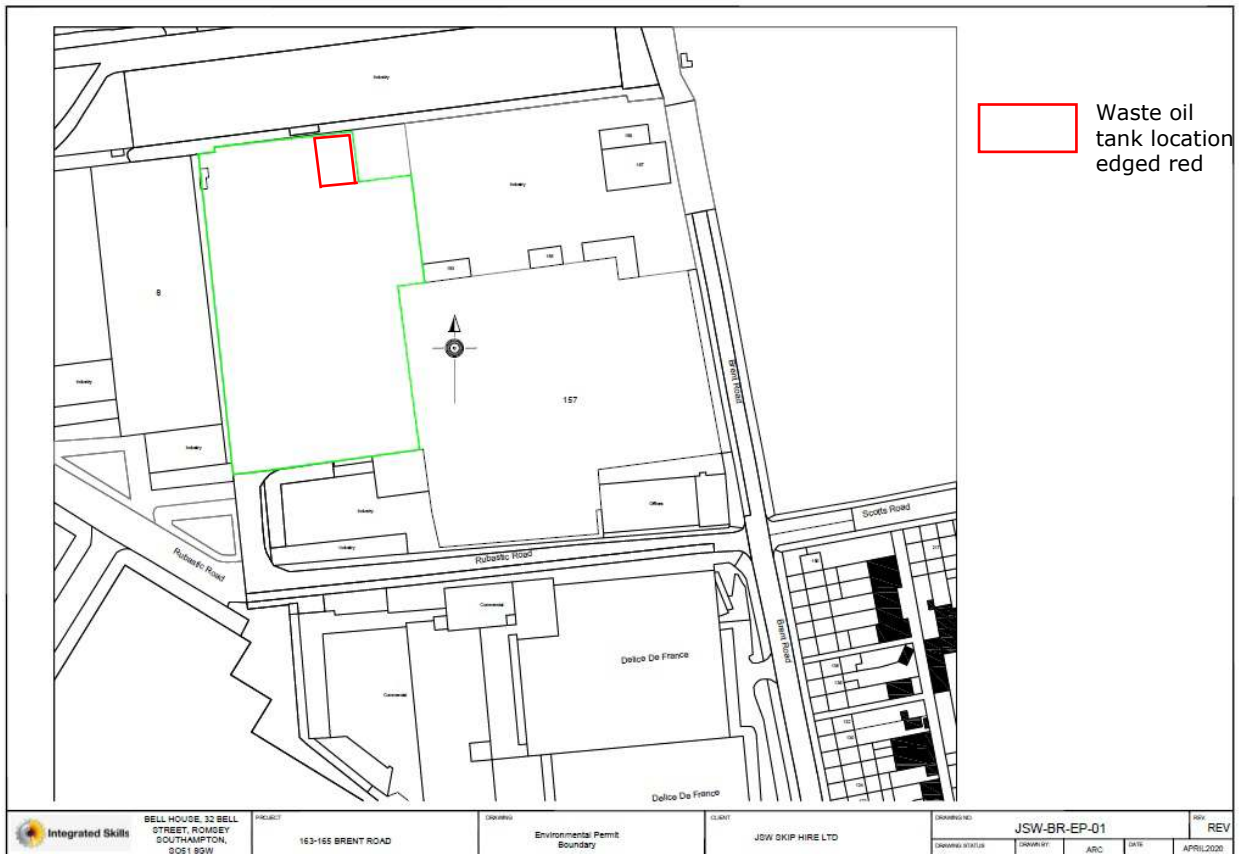
Abstraction from watercourse downstream of facility (for agricultural or potable use).	As above	Acute effects, closure of abstraction intakes.	Direct run-off from site across ground surface, via surface water drains, ditches etc. then abstraction.	Medium	Medium	Medium	Oils could be spilled during transfer/bulking operations leading to direct contamination of surface waters but these would be contained.	As above	Low
Groundwater	As above	Chronic effects: contamination of groundwater, requiring treatment of water or closure of borehole.	Transport through soil/groundwater then extraction at borehole.	Medium	High	Medium	Oils could be spilled during transfer/bulking operations leading to direct contamination of surface waters but these would be contained.	The activities are outside a groundwater source protection zone 1, or if a source protection zone has not been defined then more than 50 metres from any well, spring or borehole used for the supply of water for human consumption, including private water supplies. Other conditions as above.	Low
Local human population.	Contaminated waters used for recreational purposes.	Harm to human health - skin damage or gastrointestinal illness.	Direct contact or ingestion.	Medium	Medium	Medium	Unlikely to occur, but might restrict recreational use.	Emissions of substances not controlled by emission limits.	Low
Protected sites - European sites and SSSIs protected species/habitats and other nature conservation sites.	Any	Harm to protected site through toxic contamination and disturbance.	Any	Medium	Medium	Medium	Most likely a result of surface water contamination.	Activities shall not be carried out within 200 metres of a European Site or SSSI.	Low

Waste Types  
C4 Q1

NEW ADDITIONAL WASTE TYPES / EWC CODES TO BE ADDED

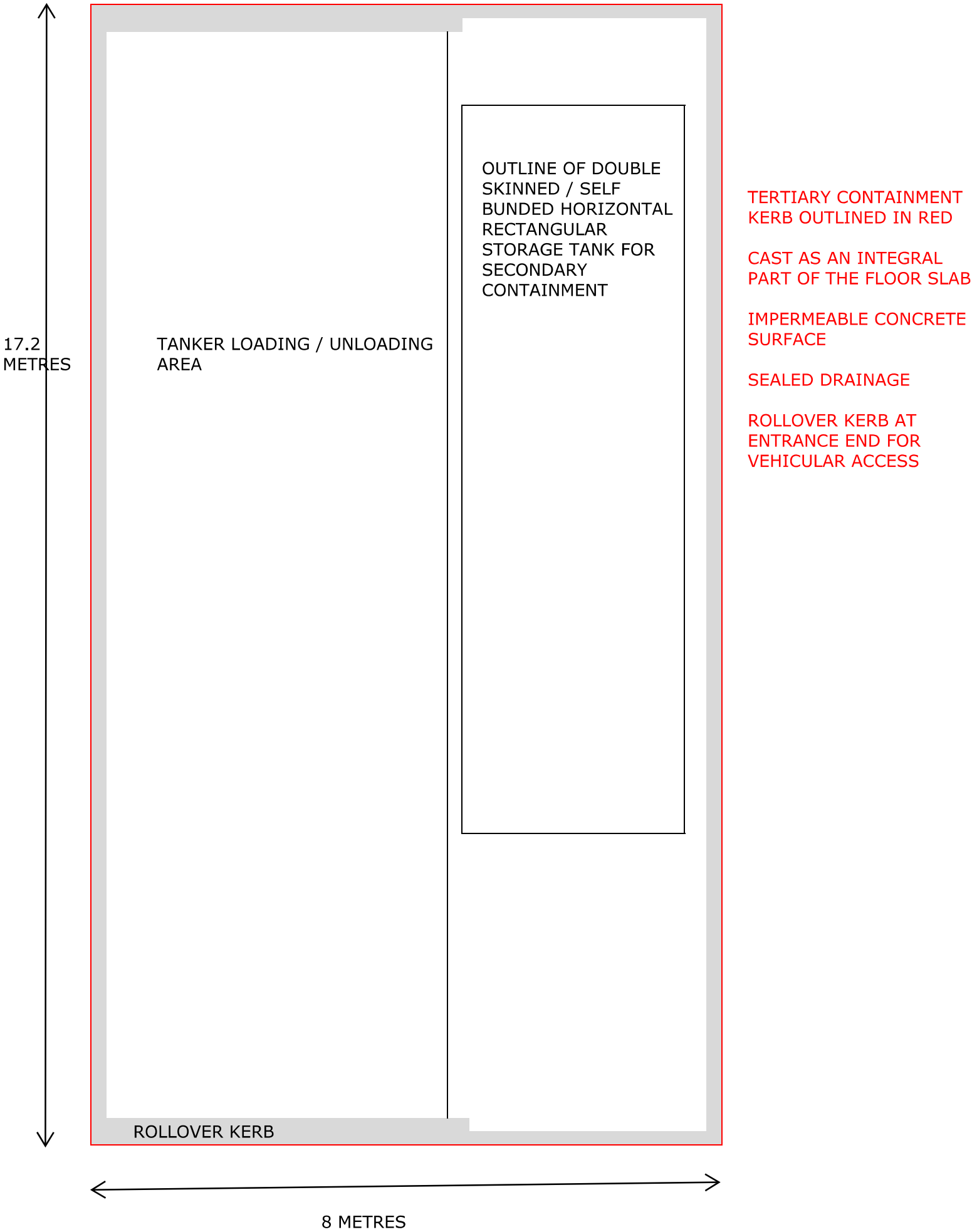
Waste Code	Description
13 01 10*	mineral based non-chlorinated hydraulic oils
13 01 11*	synthetic hydraulic oils
13 02 04*	mineral-based chlorinated engine, gear and lubricating oils
13 02 05*	mineral-based non-chlorinated engine, gear and lubricating oils
13 02 06*	synthetic engine, gear and lubricating oils
13 02 07*	readily biodegradable engine, gear and lubricating oils
13 02 08*	other engine, gear and lubricating oils
13 03 07*	mineral-based non-chlorinated insulating and heat transmission oils
13 03 08*	synthetic insulating and heat transmission oils

C4 Table 3a  
Plans & drawings

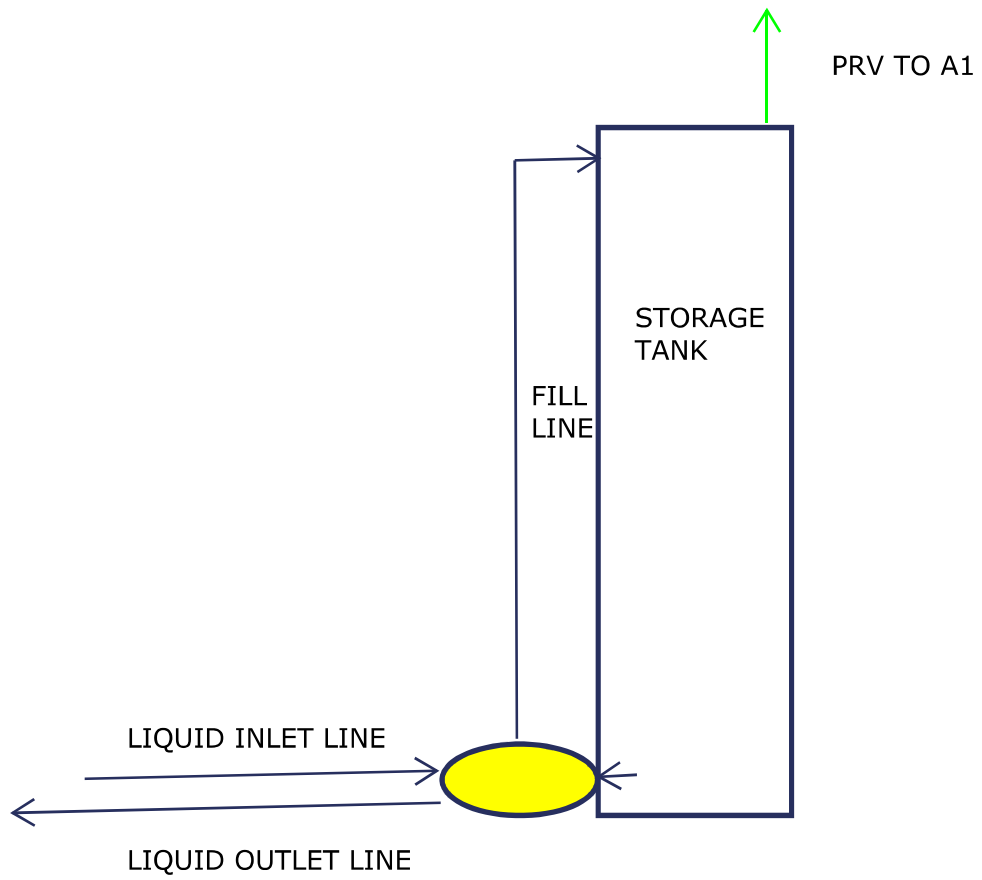


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# TERTIARY CONTAINMENT AREA AND TANK LOCATION



PROCESS FLOW DIAGRAM



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## Point source emissions

### C4 Q4b

Emissions monitoring has been undertaken across the waste oil industry and was reported to participating companies in Enviro-Lex report: Report of sampling of emissions to air and water arising from the treatment of used oil, July 2006. The relevant results from the Enviro-Lex monitoring campaign have been considered for this application.

The Enviro-Lex campaign reported a tank filling rate of 47.5m<sup>3</sup> per hour. This waste activity will receive up to 3,500 tonnes (4,000m<sup>3</sup>) of waste oil each year and hence emissions through displacement of the tank head space may occur for approximately 72 hours (0.82%) of any year. The measured emissions are shown below:

<b>Pollutant</b>	<b>Concentration (mg m<sup>-3</sup>)</b>	<b>Release Rate (g s<sup>-1</sup>)</b>	<b>Annual Release (kg annum<sup>-1</sup>)</b>
Ammonia	2.1	1.48E-06	0.007
Benzene	145	1.02E-04	0.496
Butane	99	6.98E-05	0.338
Butene	50.5	3.56E-05	0.173
Dichloromethane	164	1.16E-04	0.560
Heptane	140	9.87E-05	0.478
Hexane	124	8.74E-05	0.424
Hexene	103	7.26E-05	0.352
Hydrogen Sulphide	0.01	7.05E-09	0.00003
Methylbutane	197	1.39E-04	0.673
Methylhexane	84.7	5.97E-05	0.289
Methylpentane	78.2	5.51E-05	0.267
Pentane	414	2.92E-04	1.415
Pentene	352	2.48E-04	1.203
Toluene	1050	7.40E-04	3.589
Xylenes	350	2.47E-04	1.196

All of the emissions shown above are de-minimis.