







1MCo4 Main Works - Contract Lot S2

Site Operating Plan - Waste Transfer and Treat Station - Ruislip Southern Sustainable Placement S2

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1 Introduction

- 1.1.1 Phase One of HS2 will provide dedicated high-speed rail services between London,
 Birmingham, and the West Midlands. It will extend for approximately 230km (143 miles). Just
 north of Lichfield, high speed trains will join the West Coast Main Line for journeys to and
 from Manchester, the North West and Scotland.
- Phase One of HS2 is the first phase of a new high-speed railway network proposed by the Government to connect major cities in Britain. It will bring significant benefits for inter-urban rail travellers through increased capacity and improved connectivity between London, the Midlands, and the North. It will release capacity on the existing rail network between London, Birmingham and the West Midlands and so provide opportunities to improve existing commuter, regional passenger, and freight services.
- 1.1.3 The Materials Management Plan Framework for the HS2 scheme sets out a framework for materials reuse within the scheme. As part of the Materials Management Plan Framework the Waste Transfer and Treat Station Ruislip Southern Sustainable Placement (RSSP-WTS) will be used as an inert and non-hazardous transfer station, operated by Skanska Costain STRABAG Joint Venture (SCSJV).
- 1.1.4 In line with current waste legislation, the handling of excavated material at the site will need to be undertaken in line with the Environmental Permitting (England and Wales) Regulations 2016. In accordance with the HS2 Technical Standard on Waste Environmental Permitting the screening process for the proposed waste facility at Ruislip Southern Sustainable Placement Waste Transfer Station (RSSP-WTS), has identified the need for a Bespoke Permit application.
- 1.1.5 This Site Operating Plan has been prepared for the RSSP-WTS, operated by SCSJV. The site is located in a semi-rural area immediately north west of Ickenham and to the west of West Ruislip, in the London Borough of Hillingdon; centred around Grid Reference TQo6517 87233. This document forms one of a suite of documents that together will be submitted to the Environment Agency (EA) as part of an application for an environmental permit for the proposed RSSP-WTS site.
- 1.1.6 The RSSP-WTS will receive Tunnel Boring Machine (TBM) spoil arisings via a conveyor system from West Ruislip Portal. This material will be temporarily stored and treated within the extent of the RSSP-WTS. The material arisings are to be treated with lime additives to ensure that they have suitable properties (e.g. moisture content) for placement in the following areas: Ruislip Southern Sustainable Placement (RSSP) and Copthall Cutting East (Copthall backfill).
- Only inert and non-hazardous material will be transported via conveyor system. If any material received is considered to be hazardous waste, then it will be isolated and/or directly removed from site via road without treatment to a suitably permitted facility.

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- 1.1.8 The Site Operating Plan provides the following details:
 - A summary of the operating times of the site.
 - Waste Quantities, Types and Acceptance Procedures
 - Description of the transfer process.
 - Details of the site infrastructure
 - Substances to be used
 - Details of storage provision
 - Quality control procedures.
 - Plant arrangement and operation.
 - Details of the measures that will be implemented to control environmental nuisance.
 - Details of the records that are to be maintained.

1.2 Associated Documents

- 1.2.1 This report should be read in conjunction with the following documents submitted for the permit application:
 - Environmental Permit Application Forms (1MCo4-SCJ_SDH-EV-FRM-SSo5_SLo7-000011);
 - Non-technical summary(1MCo4-SCJ_SDH-EV-NOT-SSo5_SLo7-000008);
 - Site Condition Report (1MCo4-SCJ_SDH-EV-REP-SSo5_SLo7-000009);
 - Management Systems and Procedures (1MCo4-SCJ_SDH-EV-PRO-SSo5_SLo7-000004);
 - Noise and Vibration Management Plan (1MCo4-SCJ_SDH-EV-PLN-SSo5_SLo7-000015);
 - Dust and Emissions Management Plan (1MCo4-SCJ_SDH-EV-PLN-SSo5_SLo7-000013).
- 1.2.2 Documents associated with the RSSP-WTS site are cross referenced where appropriate.

1.3 Limitations

1.3.1 This report has been prepared for and on behalf of SCSJV in response to their particular instructions. It is not intended for and should not be relied upon by any third party and any duty to such a party using this report for any purpose is excluded.

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2 General Considerations

2.1 Hours of Operation

- 2.1.1 There are no restrictions on the hours of operations of the facility. The site will operate twenty-four hours per day, seven days per week including bank holidays. This includes operation in all weather conditions to reflect the TBM operations.
- 2.1.2 When the site operates during the hours of darkness during the winter months the operator will provide portable electric lighting to:
 - Ensure safe working conditions.
 - Enable all waste to be properly identified.

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3 Waste Quantities, Types and Acceptance Procedures

3.1 Waste Quantities and Storage

- 3.1.1 The RSSP-WTS facility will receive approximately 1,250,000m³ of material from the Tunnel Boring Machine (TBM) arisings. The material generated as part of the TBM will arrive at the RSSP-WTS facility via a conveyor system. The TBM material will arrive at the facility at a rate of between 500m³ to 3,000m³ per 24-hour day, dependent on the type of material the TBM is currently driving through. The average daily rate of material delivery from the TBM is anticipated to be within the region of 2,200 to 3,000m³ per day.
- The TBM material will arrive at the facility untreated and will be routed into one of three pugmill mixing plants for treatment, in order to achieve the appropriate material characteristics for backfill placement (e.g. desired moisture content for fill placement). Should the material already display suitable characteristics (e.g. material to be of a suitable consistency), then the material is to be routed directly back to Copthall backfill operations without entering the mixing plants for treatment.
- Once the material treatment has been undertaken, a loading shovel and/or excavator will collect the material from the pugmill and load it into an Articulated Dump Truck (ADT) for transportation to RSSP or the return Copthall backfill conveyor. Should weather, operational time or other extraneous issues prevent the immediate removal and placement of the arisings as Copthall backfill or in the RSSP facility, material will initially be placed and spread into one of three TBM arising storage bins to maximise storage space within the RSSP-WTS facility.
- 3.1.4 Collectively, the three TBM arisings storage bins have a capacity to store up to 30,000m³ of material. The storage bins within RSSP-WTS give rise to approximately a maximum of 18 days running time for the TBM (assuming no onward movement of material), however, the storage bins must never be allowed to reach full capacity (30,000m³), as this would have to result in the postponement of TBM operations until capacity at the RSSP-WTS facility can be reduced.
- 3.1.5 If maximum storage capacity is achieved and the receiving material facility is not ready to take the material, then the material will be removed from the storage bins and placed in the designated storage areas to the south of the Copthall Covert forested area. Material will be stored there until the material can be safely and efficiently removed from storage and onward to permanent placement (e.g. placement in RSSP or Copthall backfill).
- 3.1.6 Once material has been treated at the RSSP-WTS facility, onward movement of the treated material will be via a return conveyor to the Copthall backfill area, whilst material movement will be via a designated haul road for placement within the RSSP.

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3.2 Permitted Wastes

- 3.2.1 In accordance with the Council Decision 2003/33/EC, soils and stones can be admitted without testing providing that they do not originate from contaminated sites (EWC code 170504), they are a single source of waste type, and there is no suspicion of contamination.
- The materials accepted have been classified using the EWC codes as detailed in Table 1. It is anticipated that the material will comprise European Waste Code 17 05 04, soil, and stones, which is anticipated to be generated from the TBM arisings (predominantly a mixture of clays, sand, and a small amount of chalk).

European Waste Catalogue Code	Description	Classification	Restrictions
17 05 04	Soil and stones¹	Inert	Naturally occurring sub-soil and crushed stone only Excluding topsoil, peat; Excluding soil and stones from contaminated sites
19 03 07	Solidified wastes other than those mentioned in 19 03 06	Non-hazardous	

Table 1 – Acceptable waste types

- 3.2.3 Wastes that are suspected to not conform to the EWC code shown in Table 1 will not be treated/stored within the designated storage and treatment areas within the RSSP-WTS facility. This material will be removed from the incoming conveyor system and placed within a separate materials quarantine area, where this material shall be dealt with separately.
- 3.2.4 Suspected non-conforming wastes are to be delineated via visual inspection of materials along the incoming conveyor by an appropriately qualified person. Chemical testing will be used to ascertain and verify the waste classification of the material, prior to a decision being made on how the quarantined material is managed.

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4 Waste Acceptance and Control Procedures

4.1 Introduction

- The site will only accept inert and non-hazardous waste generated from Tunnel Boring Machine (TBM) spoil arisings via a conveyor system from West Ruislip Portal. Inert and non-hazardous waste will arrive by a conveyor located to the north east of the facility, directly from the area of material generation (West Ruislip Portal).
- Where waste is received from the tunnels via the conveyor, the waste transfer station is considered to be the place of production. No waste transfer note will be created at this point. Conveyor telemetry will provide a continuous volume feed with information sent to the SCSJV data library.
- 4.1.3 The waste will only consist of inert and non-hazardous material on the approved list (Council Decision, Section 3.2.1). Testing of TBM trial materials has indicated that these materials arriving to site will be classified as inert and non-hazardous.
- 4.1.4 The conveyor system that will be employed at the site will be a SMART system.
- 4.1.5 Waste characterisation will be undertaken on the materials at the RSSP-WTS site.
- 4.1.6 All waste leaving the site shall be recorded using the SCSJV appointed online Waste Portal database.

4.2 Waste reception at site

- 4.2.1 The site clerk will ensure that the wastes have come from TBM arisings originating from construction of Northolt Tunnel West via the West Ruislip Portal only.
- 4.2.2 No incoming wastes to the RSSP-WTS facility are anticipated to be transported via road, and all wastes entering the facility will enter the facility via the designated conveyor system.

 Vehicular transportation of outgoing wastes from the RSSP-WTS facility along haul roads are anticipated for placement at the Ruislip Southern Sustainable Placement (RSSP) area.
- The site office is operated by a clerk who will record the movement of vehicles from the site and identify the loads they are carrying. The clerk will complete Annual Waste Transfer Notes (AWTNs) and is responsible for their safe storage. The site clerk will sign the AWTN to confirm the details are correct. AWTNs will be made available for inspection by representatives of the Environment Agency on request.

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4.3 On-site verification

Waste reception

- 4.3.1 All loads of waste delivered to site will be visually inspected along the conveyor system and again when the waste is unloaded in the holding area by a competent operative. The objective of this inspection is to detect the presence of unauthorised waste.
- 4.3.2 The site clerk and operative at the holding area will use two-way radios so that visual inspection and cross-checking of any waste load can be carried out. The Site Supervisor or their nominee will also carry a radio so that they can be made aware of potential problems at the earliest opportunity. This might, for example, be the arrival of a waste delivery containing unauthorised waste. The Site Supervisor will then be able to ensure that such waste is handled safely and removed from site as soon as practicable.
- 4.3.3 Continuous moisture content will be monitored along the line of the conveyor to determine quantity of lime/ggbs, with the first one prior to the trip unit. If the moisture content is low, then the load will bypass the tripper unit and will be placed into the arisings bins. If the moisture content is too high (from visual inspection and moisture content readings), then the trigger will be switched by the tripper unit and the load will be sent into the pugmills for treatment.

Holding Area

- 4.3.4 Waste delivered to site via the conveyor will be visually inspected by a competent operative as it enters the holding area.
- 4.3.5 The operative will observe every load as the waste is unloaded from the conveyor.
- 4.3.6 If the operative's inspection detects any unacceptable waste (wastes which don't meet the description of wastes accepted), it will be dealt with in accordance with the waste rejection procedures below (4.4).

Multiple consignments

4.3.7 The sole source of waste is from TBM arisings from the construction of the Northolt Tunnels via West Ruislip Portal, consequently it is proposed to use a 'season ticket' for the same waste carrier to cover the delivery of multiple loads for a period of up to 12 months providing the waste is consistently of the same type (i.e. its composition does not change). This paperwork will be stored and attached to the multiple consignment note when the contract is completed.

4.4 Waste rejection procedures

4.4.1 Only waste from TBM arisings from the construction of the Northolt Tunnels via West Ruislip Portal will be accepted at the site and as a consequence the risk of non-compliant waste being received at the site is considered low.

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4.4.2 Where visual inspection has identified waste from the conveyor that is suspected to be contaminated, the material will be transferred to an isolation compound for disposal offsite by road.

- 4.4.3 The site clerk will inform the Site Supervisor or their nominee who will then inspect the load with the delivery driver and, where practicable, ensure that the unacceptable waste is returned to the waste producer.
- 4.4.4 Wastes that have been deemed unacceptable will be removed from the site within 5 calendar days of receipt.
- 4.4.5 Each load of waste dispatched from the site will be accompanied by a Waste Transfer Note.
- 4.4.6 The Site Supervisor or his nominee will record the incident in the site diary and will issue a Rejected Waste Form.
- 4.4.7 Copies of Waste Rejection Forms and letters issued to waste carrier will be stored securely and filed with other relevant contract documentation.

4.5 Duty of Care

Overview

- 4.5.1 Section 34(1) of the Environmental Protection Act 1990 imposes a Duty of Care on any person who imports, produces, carries, keeps, treats, or disposes of controlled waste. The Duty of Care is now implemented by way of The Waste (England & Wales) Regulations 2011 SI 988.
- 4.5.2 The above regulations require an adequate waste description to be provided and an Annual Waste Transfer Note (AWTN) to be completed, signed, and kept by the parties to a waste transfer. The AWTN will be valid for a year then require renewal. There are, however, some circumstances where a waste carrier will not provide an AWTN for each load (e.g. where the load is part of a regular consignment). To ensure that each load can be accounted for, SCS has arranged the site receipt docket in a way that duplicates the information required by the WTM. The Duty of Care is therefore complied with in all respects providing a waste description is received from the waste carrier, a site receipt docket is duly completed, and a copy given to the waste carrier.
- 4.5.3 AWTNs will be kept in a safe place for a period of six years, to allow inspection by the Environment Agency, in accordance with the Duty of Care Regulations.

Duty of Care transfer note

- 4.5.4 The duty of care transfer note will state the:
 - A unique AWTN reference number;
 - A written description of the waste;

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- The six-digit EWC code from the List of Waste in WM3 [R1]
- The quantity of waste;
- How the waste has been packed and contained;
- The facility address that the waste is being transferred to;
- The licence, permit or exemption number of the destination facility;
- The time, date, and location of the transfer;
- The name, address and role of the waste producer and the waste carrier;
- A record of the relevant registration numbers of each party e.g. Registered Waste Carrier's certificate number;
- Signature of all parties involved in the transfer;
- The 2007 Standard Industrial Classification (SIC) code for the project/contract;
- Confirmation that the waste hierarchy has been considered and implemented; and
- If the waste is going directly to a landfill site a declaration confirming that the waste has been pre-treated and how e.g. segregation for reuse, recycling, or recovery.

Site receipt docket

- 4.5.5 The information required on a site receipt docket will be the:
 - Name of the site;
 - · permit number;
 - waste carriers trading title and address;
 - waste description and/or produce code;
 - source of the waste by unitary authority or council;
 - waste carriers order number if available;
 - transfer note number;
 - date and time of delivery;
 - name and signature of the SCSJV representative (Name: The initials and surname of the person raising the ticket must be entered in block capitals. Signature: signature of the person raising the ticket); and
 - quantity of waste unloaded.

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Documentation procedure

- 4.5.6 One ticket per load of approved material will be issued for every load. The ticket will be generated electronically using a bespoke electronic system. A copy of the ticket will be retained at site, and a second copy will be given to the driver at the time of unloading. The ticket must be kept for six years.
- 4.5.7 Only EA registered waste carriers will be allowed on site, and a list of known waste carriers will be maintained by SCSJV.
- 4.5.8 Once the site is in operation SCS may review the documentation procedure and move to paperless system.

4.6 Sampling and analysis of waste received

- 4.6.1 It is expected that the waste received will have been characterised by the Ground Investigations that have been undertaken to characterise the materials to be generated by the various works. Any wastes that have not been subject to this previous testing will need to be sampled and tested in order to characterise the material prior to entering the facility.
- 4.6.2 To enable SCSJV to keep full documented records and demonstrate compliance with legislation, a Sampling Plan Template must be produced. These are documents drawn up in accordance with Appendix D of the Guidance on the Classification and Assessment of Waste (WM₃) [R₁].
- 4.6.3 Sampling Plans must include, but are not limited to, the following:
 - Details of involved parties;
 - Background information researched;
 - Site details;
 - Process or nature of arising;
 - Type, form, and amount of material;
 - Known physical, biological, or chemical characteristics;
 - Operational procedures that may affect characteristics;
 - Previous investigations or analysis;
 - Constituents to be tested i.e. standard waste suite, plus any additional items;
 - Health and safety precautions, and access restrictions;
 - Technical Goals i.e. for waste classification of soils;
 - Name and organisation of testing contractor;

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- Statistical approach to be used methodology provided by testing contractor;
- Sampling approach and pattern methodology provided by testing contractor;
- Identify sampling locations drawing of site showing sampling points including depths; and
- Sample details e.g. 3 samples at 1m depth, to be named appropriately.

Number of Samples Required

- 4.6.4 The frequency of sampling will be dependent on the amount of ground investigation laboratory testing data for the waste source. Where no laboratory test data is available, representative sampling will be undertaken on each waste source.
- 4.6.5 Testing of TBM trial materials has indicated that the materials arriving to site will be classified as inert and non-hazardous.
- 4.6.6 Additional validation samples will be taken monthly on all waste streams to confirm continued compliance with the permit.

Sampling Determinands

- 4.6.7 All soil samples will be prepared and analysed by a UKAS laboratory using the MCERTS performance standards. The analysis procedure and chemical determinands will be reviewed from time to time to consider advances in practical experience, waste research and analytical technology, and may also vary as a result of changes in legislation.
- 4.6.8 Samples will be tested for a combination of the most commonly occurring organic and inorganic contaminants as listed below, unless they can be scoped out based on previous analysis results (e.g., from a Ground Investigation):
 - Heavy metals (As, Cd, Cu, Mo, Pb, Hg, Ni, Sb, Se, Zn);
 - Chromium III & VI;
 - pH;
 - All results corrected to dry weight terms;
 - Moisture content correction type (i.e., wet, or dry correction) and value specified; and
 - Full Waste Acceptance Criteria (WAC) analysis (single step leaching test).
- 4.6.9 (Note: included to enable inert and non-hazardous classification and landfill type if there is no other disposal option).

5 Site Infrastructure

5.1 Proposed Infrastructure

- 5.1.1 The site will comprise a temporary storage area for inert and non-hazardous excavated materials received by conveyor from the TBM procedures.
- 5.1.2 The site infrastructure includes:
 - A two-way conveyor system. This allows for incoming TBM arisings to be brought into the facility, and outgoing treated TBM arisings to be transported for placement as Copthall backfill. Tipper areas are designated along the conveyor to allow for easier materials movements into the storage bins and treatment areas;
 - Waste treatment area which comprises a concrete apron, without reinforcing steel, the concrete apron will sit on a stabilised soils foundation to reduce import of aggregate. This area includes designated lime/GGBS silos and pugmills for material treatment;
 - Waste storage area which comprises three TBM arisings storage areas (bins), each
 with a capacity of 10,000m³. The bin foundations will comprise a 200m thick
 reinforced concrete slab, and the bin walls will comprise a pre-cast concrete unit
 which is 3.8m in height. Roof cladding will be placed on top of the bins so that they are
 covered. A designated materials quarantine area is to be placed adjacent to the TBM
 storage bins, for materials that do not conform to the suitability standards;
 - Drainage: A series of designed falls will drain the waste treatment area to a perimeter filter drain and associated catchpits along the perimeter drainage system (at maximum intervals of 100m).
 - The filter drain will carry any runoff to an attenuation pond. The attenuation pond outfall will be filtered through a silt extraction unit and a pH reduction plant before being discharged at the given discharge location;
 - One-way perimeter haul road system around the main waste transfer station apron.
 This will be constructed so that the haul road will have cross falls to a filter drain,
 connected to the main drainage system;
 - An additional haul road will be constructed from the RSSP-WTS facility to the RSSP, to allow for the onward conveyance of treated TBM arisings for placement at the RSSP. This haul road will be a concrete construction and will require two sewer pipeline crossings, one high pressure gas main crossing and one high pressure water main crossing.
- 5.1.3 There will be limited welfare facilities within the RSSP-WTS facility, as the main existing Copthall South offices will provide the bulk of facilities required for the operations. These

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offices are located directly to the west of the RSSP-WTS permit boundary. Wheel wash facilities and re-fuel areas are also currently in place at the Copthall South offices, which forms the entrance to the RSSP-WTS facility. It is proposed that the wheel wash/fuel facilities within the Copthall South offices will be used for RSSP-WTS traffic. In addition to the wheel wash, SCS road sweeper vehicles are regularly patrolling Harvil Road to ensure this road is kept clear of mud and debris (including from RSSP-WTS traffic).

- 5.1.4 An SCS UKAS accredited laboratory will be situated in the south west corner of the RSSP-WTS facility. This laboratory will be outside of the delineated boundary for the RSSP-WTS facility.
- Aerosol canons will be mounted on the storage bin walls and the tripper gantry along the conveyor to allow for dust suppression measures to be implemented. Low level misters will also be mounted alongside the perimeter haul road. The misters and the aerosol canons will be mains fed.
- 5.1.6 Lighting may be mounted on the tipper gantry and will be on self-supporting lighting towers and/or poles. The lighting will be designed to safely illuminate all working on the RSSP-WTS area to accommodate 24/7 working. The lighting will incorporate anti-glare shielding to protect the adjacent dwellings from night-time light intrusion, additional light intrusion measures may be required, such as strategic fencing, canopies.
- 5.1.7 The approximate location of the site infrastructure is shown in Appendix A (1MCo4-SCJ-EN-SKE-SSo5_SLo7-650028 and 1MCo4-SCJ-EN-SKE-SSo5_SLo7-650029).

5.2 Description of the Transfer Process

Plant Arrangement and Operation

- 5.2.1 Upon delivery to the site, inert and non-hazardous material (TBM arisings) will be temporarily stored in the larger holding compound area in the north of the site if they do not require treatment. Should the materials require treatment, they will be treated in the designated treatment zone and then placed within the storage areas. Any materials that are suspected to not comply with inert and non-hazardous material classification will be stored in a quarantine storage area. These areas are described below.
- The TBM arisings storage areas (storage bins) will be founded on a 200mm thick reinforced concrete slab. The bins will be retained by a pre-cast concrete unit, which will be 3.8m tall and below the pre-cast units the reinforced concrete slab foundation will be 300mm in thickness.

 Material stored within the storage bins will be at a maximum of 3.3m in height.
- The bins will be separated by a series of 406mm diameter columns, which are to be founded on 1m x 1m x 1m concrete pad foundations. The columns will extend in height above the precast concrete unit (3.8m) and will accommodate the roof cladding, which will allow for the storage areas to be covered.

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TBM arisings entering the facility for storage will be placed into the storage bins via a conveyor system, with the tipper unit attached to the conveyor allowing for deposition of arisings from the conveyor and into the storage bins. The tripper unit is to be designed so that TBM material is to be deposited from the conveyor and the top of the pre-cast unit (3.8m), but below the roof cladding.

- Should the incoming TBM materials display poor quality characteristics (e.g., excess moisture contents), then these materials will require treatment. The facility comprises a concrete structural apron for the treatment of materials and will incorporate lime/GGBS silos/pugmills for materials treatment. Materials will be placed into the treatment area via a tipper unit attached to the incoming conveyor system. Once treated, the material will be placed in one of the three TBM arisings storage bins until there is a requirement for use at one of the receiving facilities (Copthall backfill or RSSP). The treatment station will be connected to the facility drainage system through a number of designed falls and catchpits.
- 5.2.6 The designated materials isolation holding bunded compound has been designed to structurally adjoin the TBM arisings storage bins but is separated by structural columns and pre-cast units. These structural features will allow for the separation of the quarantine areas from the general storage areas, to prevent the mixing of these materials.
- The front face of the storage bins will remain open, which will allow a loading shovel and/or Articulated Dump Truck (ADT) to collect material for placement on the return conveyor (material going to Copthall backfill) or for placement in loading wagons (for onward placement at RSSP).
- 5.2.8 Excavated soils will be delivered to the site via an overhead conveyor system which enters the RSSP-WTS facility from the north east and crosses over the main railway line.
- 5.2.9 Road vehicles will follow a one-way system via a haulage road so that the material can be transported for placement to the RSSP.

5.3 Surface Water Management

- 5.3.1 A Drainage Technical Report has been written for the scheme, which incorporates the operations that will take place at RSSP-WTS (1MCo₄-SCJ-EN-REP-SSo₅_SLo₇-0000₂7).
- The extent of land required to implement the required drainage as part of the RSSP-WTS facility will encroach into the existing Copthall Site Office area and will disturb the existing drainage in place there. As a result, the proposed drainage extent covers modifications to the Copthall Site Office existing drainage network and becomes part of the overall systems drainage strategy for the area.
- 5.3.3 The construction of the RSSP-WTS facility will require the construction of new hard impermeable surfacing across the extent of the majority of the site, in order to be suitable to accommodate the required vehicular and mechanical loads. The construction of new concrete

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hard impermeable surfacing will generate more surface runoff during the temporary operation of the site. The implemented drainage network will ensure that generated surface water runoff is conveyed and controlled in an effective manner.

- The arisings bin storage areas will have roof cladding to prevent rainwater runoff from mixing with treatment lime and arisings, which would otherwise enter the proposed drainage network as slurry. There is opportunity for traces of lime and arisings to be assimilated into runoff during the transportation of materials between treatment and storage zones.

 Additionally, the concrete apron where the lime silos are located may be an area where accidental spillages of lime may occur, which could create potentially contaminated runoff. The area surrounding the TBM arisings storage bins, concrete treatment apron and perimeter haul road is considered to be a critical area of drainage interception, in order to intercept runoff in these hardstanding areas and collect this runoff into a centralised drainage system.
- 5.3.5 Contaminated runoff with silt and concrete/lime may contribute to high silt levels and pH, which would require treatment before discharge. Any contaminated runoff will be pumped at a restricted flow rate of 20l/s into the proposed siltbusters to treat pH and remove silt and attenuate runoff. Treated water from siltbusters will then pass into the proposed downstream drainage network which discharges into the proposed attenuation pond to the south. For the solids generated from the siltbusters, these will be placed into a sludge storage skip, tested, and then will be disposed off-site as waste. If the sludge can be deemed as inert and non-hazardous for waste disposal from the testing, then this can be mixed and assimilated with the TBM arisings.
- 5.3.6 To the south of Copthall Covert (forested area), the land is currently characterised by a grassed area and will remain mostly as existing during construction. Part of this area will be used for topsoil storage in stockpiles. All stockpiles are to have a silt fence installed to prevent silty runoff to the south. A 400mm high earth bund is proposed to intercept field runoff from the existing grassed area/proposed topsoil storage area and to prevent it from entering the attenuation pond, proposed filter drains and overloading the proposed pump operations. The intercepted runoff at the bund is likely to cause channel flows along the proposed bunds. To prevent direct impact of the channel flows on the watercourse, a series of cut-off bunds have been proposed along the bunds. The channel flows will then enter a 2m long swale before entering the discharge point.
- 5.3.7 A haul road is located to the east of the topsoil storage area, extending from the RSSP-WTS facility to the RSSP. Filter drains are proposed along the haul road to capture surface runoff from these haul roads.
- 5.3.8 The attenuation pond will collect treated runoff from RSSP-WTS. The restricted flow rate from the proposed attenuation pond into the discharge point (watercourse) is 16 l/s. The attenuation pond will have capacity for temporary and permanent storage, with the permanent water stored proposed to be used for construction activities such as dust

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suppression. The proposed outfall from the pond will comprise a 2m swale which will connect to the existing watercourse (discharge point), which is a tributary of the River Pinn.

5.4 Maintenance

5.4.1 A visual inspection of the site will be undertaken on a quarterly basis. Any areas requiring remediation works will be carried out as soon as reasonably practicable.

5.5 Provision of site identification board

General

- 5.5.1 A notice board will be erected at the site entrance. The notice board will be constructed from durable materials and will display the following details:
 - Name and address of the waste transfer station.
 - Statement that the site is permitted by the Environment Agency and the permit reference number.
 - Name, address, and telephone number of the permit holder.
 - The Environment Agency's national numbers for general enquiries and emergencies.
 - The emergency contact and telephone number of the permit holder.
 - Operating times.

Maintenance

5.5.2 The notice board will be inspected regularly and checked for integrity and accuracy of the information. Repairs/alterations will be carried out as soon as possible after any defect is noted.

5.6 Site security

General

- 5.6.1 Access to the RSSP-WTS facility will be via the main entrance to the Copthall South Office. Access to the Copthall South Offices is restricted using fencing to prevent vehicular access and discourage casual visitors.
- 5.6.2 Any damage to boundary fencing that exposes members of the public to significant risk or that allows unauthorised vehicular or pedestrian access to the site will be made good with a temporary repair until a permanent repair can be made.
- 5.6.3 A note will be made in the Site Diary of when the inspections are carried out and a record will be made of any damage discovered and the remedial action taken.

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- The site entrance gates, and perimeter fencing are of sufficient height (2.4m) to prevent easy access. The gates will be kept locked at all times when not in use, using a close-shackle padlock. The site will be checked daily to ensure gates and buildings are secure and locked when not in use. The site gates will be managed by security staff who will ensure no unauthorised access.
- 5.6.5 All mobile plant will be parked securely when not in use.

Buildings

- 5.6.6 Doors will be made of substantial material and preferably metal lined.
- 5.6.7 Door keys will never be left on top of the lintel, under stones or in other "concealed" places.
- 5.6.8 Windows will be fitted with toughened glass and be covered with bars or lockable steel shutters for protection during periods of closure.

Property

- 5.6.9 Keys giving access to the SCSJV property will only be kept by persons authorised to do so by the Site Supervisor.
- 5.6.10 A key register will be compiled and maintained for all properties.
- 5.6.11 Key-holders will be notified to the local police station and this information kept up to date.
- 5.6.12 Wherever possible, one person should be made responsible for locking up and where applicable setting the burglar alarm.

Vehicles and mobile plant

- All vehicles and mobile plant are to be locked when not in use. Windows will be of toughened glass or protected by screens at night.
- 5.6.14 A record of serial numbers should be maintained for all mobile plant. Spare parts will be kept in a secure store and records maintained.
- 5.6.15 Clamping is desirable for cars, vans, and trucks left on site overnight.

Documents

- 5.6.16 There will be only one key-holder to the safe and the key-holder must keep the key on their person.
- 5.6.17 When not in use all confidential papers must be kept in a locked drawer.
- 5.6.18 There must be no delay in reporting the theft of any confidential documents.

Visitors

5.6.19 Unauthorised persons are not allowed on SCSJV premises.

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- Visitors must call at the site office, identify themselves and state the nature of their business.

 Unless the caller is known they MUST NOT be allowed to find their destination unaccompanied.
- 5.6.21 Individuals will not be allowed to go onto the site to remove material(s) unless authorised in writing.
- Once authorised waste is unloaded in the licensed area it becomes the property of the SCSJV and unauthorised removal is therefore theft.

Report of thefts

- 5.6.23 Supervisors must immediately inform their Site Supervisor or nominee and security of any occurrence of:
 - Breaking and entering of SCSJV premises;
 - vandalism;
 - theft from SCSJV premises;
 - any act or suspected act of dishonesty;
 - stock or cash deficiencies.
- 5.6.24 Where an outside element is suspected the police will be called without delay.

6 Environmental Nuisance Control

6.1 Introduction

6.1.1 The environmental nuisance control measures described below should also be read in conjunction with the Management Systems and Procedures (1MCo4-SCJ_SDH-EV-PRO-SSo5_SLo7-000004) and separate Dust and Emissions Management Plan (1MCo4-SCJ_SDH-EV-PLN-SSo5_SLo7-000013) and Noise and Vibration Management Plan (1MCo4-SCJ_SDH-EV-PLN-SSo5_SLo7-000015).

6.2 Dust control procedures

- 6.2.1 Dusts, fibres, and particulates are found in wastes with a fines content and soils. They are generated during periods of dry weather in combination with windy conditions.
- 6.2.2 The focus of the dust management strategy is to control dust generation and movement at source. The main sources of dust particularly during periods of dry weather, are likely to be from conveyor transfer points and unloading and loading of waste.
- 6.2.3 The following measures will be implemented and maintained throughout the operational life of the site, the objective of which will be to prevent and minimise the release of airborne dusts, fibres and particulates arising from the permitted waste management operations in such quantities or concentrations that are likely to cause pollution of the environment or harm to human health.

6.3 Dust and emissions control measures during transportation of materials

- 6.3.1 Waste will be delivered to site by conveyor.
- 6.3.2 All outgoing vehicles will be required to have sheeted loads, in order to avoid the spillage of material or creation of dust outside the site.
- 6.3.3 Vehicles transporting outgoing materials will not be overloaded.
- 6.3.4 The number of handling operations for materials will be kept to the minimum reasonably practicable.
- 6.3.5 All HGVs will be Euro VI emission standard and all LDVs will be Euro 6 diesel, or Euro 4 Petrol.
- 6.3.6 Within the site, internal haulage will be restricted to clearly delineated routes, on impermeable concrete or asphalt.
- 6.3.7 In dry weather, and when necessary following inspections, water will be used to control dust movement.
- 6.3.8 Vehicles and plant will be switched off and secured when not in use.

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- 6.3.9 All site vehicles will be maintained in accordance with the manufacturer's instructions and will be fitted with upswept exhausts and radiator cowls.
- 6.3.10 Site haulage speeds will be controlled to minimise possible dust entrainment. Appropriate instruction will be issued to all vehicle drivers.
- 6.3.11 All haul roads and site surfacing will be hard surfaced (mix of asphalt, concrete, block paving), not loose unbound materials. As such the surface will not generate dust themselves. The cleanliness of surfaces will be maintained through regular use of a road sweeper.
- 6.3.12 A noticeboard summarising the site rules for visiting drivers is displayed in a prominent position at the site entrance, and a complete set of rules will be displayed in the Copthall Site Office. Copies of the site rules will be available for issue to visiting drivers.
- 6.3.13 Drop heights from the conveyors will be kept to the reasonably practicable minimum.
- 6.3.14 The conveyors will be fully enclosed to ensure that no dusts from transported soils become airborne during material transportation to the site. A mist spray system of nozzles will be fitted to the exit shroud of each conveyor belt discharge and operated if required to avoid fugitive dust emissions from the materials becoming airborne beyond the discharge point.

6.4 Dust and emissions control measures during the transfer of waste

- The site will receive inert and non-hazardous waste by conveyor. The material will be temporarily stored on site in the enclosed arisings bin storage areas, prior to onward transport via the return conveyor or by road (to RSSP). The enclosed arisings bin storage areas will be equipped with a roof and bin walls, to ensure that the waste is bunded appropriately to prevent airborne dusts. The waste will be clayey with a cohesive nature, and it is expected that much of this material will not in itself create significant dust arising. However, dust can arise from the physical operations associated with the transfer of waste.
- The arisings bins will have a concrete base with a 3.75m high concrete wall. Waste will be kept at least 0.5m below the top of the wall height to avoid wind whipping. The front of the bins will remain open, allowing for the loading of lorries with wastes (using a loading shovel) for onward transport to the RSSP area.
- Dust suppression in the bins will be from aerosol canons mounted on the bin walls and the tripper gantry, low level misters will be mounted alongside the perimeter haul road. The misters and the aerosol canons will be mains fed. Tractors and sludge tankers will also be used to retrieve water from the attenuation pond for use in the misters.
- 6.4.4 A loading shovel will be used to place wastes on the return conveyor, for onward transport to Copthall East. The conveyor will be shielded to ensure that there are no airborne dusts arising from the outgoing transfer of waste materials.

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The isolation holding bunded compound will have a concrete base with a 3.75m high concrete wall; adjoining the arisings bins storage areas but separated by structural columns and precast units. Waste will be kept at least 0.5m below the top of the wall height. A grab will be used for loading onto lorries.

- 6.4.6 A sufficient number of dust canons will be located within the topsoil storage area (estimated up to 4 depending on size) and operated to avoid fugitive dust emissions from the waste materials and deposits on the off-haul route areas becoming airborne.
- 6.4.7 Stockpiles and mounds will be kept away from sensitive receptors where reasonably practicable and sited to consider the predominant wind direction relative to sensitive receptors.
- 6.4.8 One daily visual inspection each day will occur on the stockpiles to ensure dust generation is minimised. Details of the visual inspections are located in Appendix A of the Dust and Emissions Management Plan (1MCo4-SCJ_SDH-EV-PLN-SSo5_SLo7-000013).

6.5 Dust and emissions control management procedures

- 6.5.1 The Site Supervisor, or their nominee, will exercise day-to-day control on site at all times. The Site Supervisor will have particular responsibility for ensuring full compliance with the conditions attached to the DEMP. Specifically, the Site Supervisor will assume control, either personally or by delegation to suitably trained and responsible staff, of:
 - Vehicle movements;
 - All loading, tipping and materials handling operations;
 - Operation of dust suppression measures; and
 - Inspection, cleaning and maintenance of all plant and equipment.
- 6.5.2 SCSJV operates an externally audited Environmental Management System (EMS) which is certified to ISO 14001.
- 6.5.3 Staff at all levels will receive the necessary training EMS and instruction in their duties relating to the control of all operations and the potential sources of dust emissions. Particular emphasis will be given to dealing with plant malfunctions and abnormal conditions. Site staff will inform the Site Supervisor whenever visible dust emissions are observed or appear likely to occur, as a result of any site operation.
- 6.5.4 The continuing effectiveness of this dust management scheme will be reviewed regularly in the context of monitoring results.

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6.6 Dust, fibres, and particulates monitoring

- 6.6.1 Monitoring and reporting will be undertaken in line with the overarching requirements set out in the CoCP (HS2 Code of Construction Practice) and the Dust and Emissions Management Plan (1MCo4-SCJ_SDH-EV-PLN-SSo5_SLo7-000013).
- 6.6.2 Visual inspections of the facility and access roads will be undertaken by the Site Supervisor or their nominee at least twice during each working day (start of day and mid-day as a minimum). A record of the inspections and their findings, together with the prevailing weather conditions, will be kept in a logbook made specifically for this purpose.
- 6.6.3 Additionally, the transfer of dusty wastes will be carefully monitored during periods of high winds.
- 6.6.4 Dust suppression measures will be required to ensure that no visible dust leaves the facility.
- 6.6.5 The focus of the dust control strategy is to control dust generation and movement at source. Therefore, no receptor-specific dust monitoring will be undertaken. The requirement for receptor-specific dust monitoring will be reviewed at regular intervals.

6.7 Dust, fibres, and particulates action plan

- 6.7.1 Monitoring will be used to ensure the effectiveness of these onsite mitigation measures and demonstrate compliance with the EMRs.
- Continuous real-time monitoring (at locations to be agreed with HS2 and the London Borough of Hillingdon) will be configured to provide real time access to data and allow alerts (by text, email, or other means) to be sent to designated recipients when levels approach or exceed predetermined thresholds. A preliminary trigger action level of 75µg/m³ (over a 5-minute average) will be adopted. Any exceedance, or potential exceedance, of dust thresholds will trigger an alert and subsequent investigation. If the alarm is triggered, the following process will be followed:
 - the construction team nominated person (or a delegated representative) will
 investigate activities on site, as quickly as reasonably practicable, to ascertain if any
 visible dust is emanating from the site or if any activities are occurring on site that are
 not in line with the dust control measures;
 - any identified causes will be rectified where practicable and actions recorded in the site logbook and reported to the nominated undertaker. The nominated undertaker will report this to the relevant authority as soon as reasonably practicable after it has been informed by its contractors;
 - if the source of the incident cannot be identified as originating from the site
 operations, operations of other nearby construction sites and other activities will be
 investigated for potential causes of the alarm. Other sites' particulate matter

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monitoring data may be available to assist this investigation; and

- if the source of the alarm is not related to the site operations, the outcome of any investigation and associated actions will be recorded in the site logbook.
- 6.7.3 Environmental Managers/ Advisors will coordinate investigation of any exceedances, with the construction team being required to consider the immediate cause of any exceedance and, where necessary, implement suitable control measures. The AQ Specialist shall provide monitoring data and interpretation to support the investigation.
- 6.7.4 The monthly dust monitoring report will include a summary of the preliminary trigger level, the measured exceedance level, the likely causes of the exceedance, a description of relevant on-site activities and actions taken for verification/ remediation

6.8 Dust complaints procedure

- 6.8.1 A complaints procedure will be established to ensure that any nuisance being caused to local residents is dealt with effectively.
- 6.8.2 The SCSJV has adapted its incident management procedures to align with the HS2 incident management process which, in summary includes:
 - A three-tier response command structure (Gold, Silver, Bronze) to manage an incident;
 - A single process for the management of all events that constitute an incident, with defined levels to help frame the response – Levels 1 to 4 (Level 1 being the most serious incidents);
 - A 24-hour, 365-day Help Desk, operated by HS2, to start the co-ordination of HS2's
 response to an incident and to support the SCS JV where appropriate. The help desk is
 the first point of contact (0207 944 6570) to HS2. for all Level 1 and 2 incidents on the
 programme; and
 - An on-line incident reporting system (HORACE) that records the details of an incident and supports communications, investigation, and follow-up activities to avoid a recurrence.
- 6.8.3 Each complaint will be investigated. The Site Supervisor will report the findings and the action taken to the Environment Advisor. The Environment Agency (and any other relevant regulatory authority) will be advised in writing within two weeks of any dust complaint received together with the findings of the investigation and any corrective action taken.

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6.9 Odour control

6.9.1 The types of waste to be processed or disposed of at the site are not likely to give rise to unacceptable odours, consequently odour management, monitoring and action plans are not considered necessary.

6.10 Control of mud and debris

- 6.10.1 Mud and debris may be carried out of the site boundary onto public roads by the wheels of vehicles leaving the site. The problem of mud and debris is most likely to occur during and after heavy rain.
- 6.10.2 Road vehicles will use a wheel wash at the Copthall Site Office prior to leaving HS2 owned premises, which will prevent mud leaving the site.
- 6.10.3 The site entrance and access road (including the Copthall Site Office) will be inspected daily to check whether it is clean and tidy. A road sweeper or a tractor and brush will sweep the site entrance and the access road if the daily inspection indicates it is necessary.
- 6.10.4 Road cleaning will be undertaken within 2 hours of an inspection indicating that mud levels are unacceptable. If road cleaning cannot be undertaken within 2 hours, the Site Supervisor will review the situation and movement of vehicles on or off the site will be restricted as necessary.
- 6.10.5 Additional inspections will be included as necessary in response to comments from the general public or during and following periods of particularly heavy rainfall.

6.11 Litter control

- 6.11.1 With the source of waste being solely excavated material from Phase One of HS2, litter is not expected to be an issue on the site. Notwithstanding this, the following measures will be implemented and maintained throughout the operational life of the site, the objective of which will be to prevent any litter escaping from the confines of the site:
 - Vehicles exporting waste will remain sheeted until the vehicle reaches the waste reception area, or, if the nature of the waste or windy conditions could give rise to windblown litter, until the vehicle reaches the unloading point (RSSP).
 - Loose litter on the access roads or at the site entrance will be collected daily.
 - Inspections of the site as a whole will be carried out weekly and any litter discovered will be collected and transported to a disposal facility that is authorised to receive such waste.
- 6.11.2 In the event that litter does escape from the site in windy conditions, it will be collected as soon as practicable, and not later than the middle of the following day.

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6.12 Pest/vermin control

- 6.12.1 The types of waste to be accepted at the site present a very low risk of attracting pests or vermin. Notwithstanding this, the following measures will be implemented and maintained throughout the operational life of the site, the objective of which will be to prevent pest infestations arising on the site.
- 6.12.2 The Site Supervisor or their nominee will inspect operational areas of the site for pest infestations on a daily basis. A record of the inspections and their findings will be kept in the Site Diary. A specialist contractor will be employed to control pests if required. If remedial action is required, a note of any treatment supplied will be made in the Site Diary.

6.13 Noise control

- 6.13.1 Refer to Noise and Vibration Management Plan (1MCo4-SCJ_SDH-EV-PLN-SSo5_SLo7-000015).
- 6.13.2 From the BS4142:2014 assessment findings, the comparison between construction levels and pre-existing ambient levels indicates that construction levels exceed the existing ambient levels for only one receptor (R1) during daytime. During night-time periods at all receptor groups pre-existing ambient noise levels are greater than the calculated construction noise and thus mitigate the potential noise impacts.
- 6.13.3 Based upon the findings of the BS5228:2014 assessment, the assessment indicates that the noise from construction activities would not exceed the threshold during daytime periods for any of the receptors considered. During the evening period the threshold level is exceeded at only one receptor group which represents just 1 property. During night-time periods, the threshold levels are exceeded at five receptor groups.
- To mitigate the assessment findings, a number of BPM (best practical means) measures have been identified within the Noise and Vibration Management Plan (1MCo4-SCJ_SDH-EV-PLN-SSo5_SLo7-000015). This includes controls around working hours, abnormal deliveries, hoardings, fencing and screening, and the construction site layout.

6.14 Potentially polluting spillages and leaks

- 6.14.1 Potentially polluting wastes will not be accepted at the site, but there is a potential for leaks and spillages from the transfer of waste. A bunded reinforced concrete base will enable containment and clean-up of any spillages in a controlled manner without risk to the environment.
- 6.14.2 The loading point for waste will be provided with a reinforced concrete slab and bunded on three sides to contain any accidental spillage
- 6.14.3 No fuel or oil will be stored within the permit boundary, rather any plant machinery will be refuelled at the existing premises within the Copthall South Office.

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6.15 Fires on site

- 6.15.1 No wastes will be burned on site.
- 6.15.2 The types of waste which will be accepted at the site are not likely to give rise to fires or heating, therefore no specific control measures or action plan are required.
- 6.15.3 Office and accommodation areas will have the necessary firefighting equipment to fight fires.
- 6.15.4 All mobile plant will carry a fire extinguisher and will be inspected and maintained in accordance with the plant maintenance schedule to mitigate any potential fires.
- 6.15.5 In the unlikely event that a fire does occur that cannot be safely dealt with using the on-site equipment, the local fire service will be called.

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7 Site Records

7.1 Security and availability of records

Security of records

7.1.1 All records which are required to be made under the conditions of the permit and the environmental management system will be maintained and kept secure from loss, damage or deterioration as detailed below:

Written records

- 7.1.2 The following records and documents will be available for inspection at the site office:
 - Visitors Book;
 - Site Diary;
 - Environmental Permit;
 - Daily inspection reports;
 - Site Operations Manual;
 - Monitoring Plans;
 - Management Systems and Procedures
 - Maintenance records;
 - Copies of all the Environment Agency visit or inspection reports;
 - SCSJV Safety Policy;
 - · Emergency procedures;
 - Daily intake forms;
 - SCSJV Red and Blacklists (confidential documents, not available for inspection); and
 - Waste transfer and acceptance documentation.
- 7.1.3 With the exception of the visitor book, all records will be kept electronically or in secure, lockable filing cabinets or cupboards when the office is unattended.

7.2 Availability of records

7.2.1 All records which are required to be made under the conditions of the environmental permit will be made available for immediate inspection when required by an authorised officer of the Environment Agency.

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7.2.2 A noticeboard will be maintained in the office with up-to-date versions of the following prominently displayed:

- Method of working signed and dated by the Site Supervisor;
- Certificate of employer's liability insurance;
- Emergency telephone numbers;
- The Operator's conditions of acceptance of waste (printed copies will be available for issue should these be required), and
- The Operator's site safety rules for waste carriers/visitors. (Printed copies will be available for issue should they be required.
- 7.2.3 Records of wastes that are accepted at the site, records of waste that are rejected and despatched from site and site diary records will be kept for a minimum of six years.
 Environmental monitoring records will be kept until a certificate of completion is issued for the land.

7.3 Records of waste movements

- 7.3.1 A record will be kept of each load of waste transferred. This record will include the following details:
 - The nature of the waste, i.e. Solid;
 - Waste type, see Table 1;
 - quantity, i.e. tonnes, number;
 - date received;
 - date accepted, if different from received; and
 - origin of waste, in terms of place.
- 7.3.2 A summary record of the waste types transferred will be made and submitted to the Environment Agency in accordance with the permit. The format of the summary record will be agreed with the Agency.

7.4 Site Diary

- 7.4.1 A site diary will be maintained by the Site Supervisor and will be kept secure. The site diary will be available for inspection when required by an authorised officer of the Agency.
- 7.4.2 The diary will include a record of the following:
 - unacceptable waste details;

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- complaints received;
- operational functions (e.g. plant services);
- observations made during daily site inspections;
- any unusual circumstances;
- changes to procedures.

Daily inspection checklist

- 7.4.3 To assist in the completion of the diary, the Site Supervisor refers to the "daily inspection check list". The daily inspection may comprise of the following checks:
 - That radios are working properly;
 - all site plant is operating and maintained according to schedules;
 - that the day's routine monitoring has been done;
 - · on any high environmental monitoring readings reported;
 - that the spray system and water bowser are in use if dust suppression is necessary;
 - inspection of any drains and or gullies for potential mud, silt, suspended solids;
 - if litter is a problem;
 - if any unacceptable waste has been delivered. If so, ensure segregation, removal and reporting in site diary;
 - potential pests etc;
 - cleanliness of access road mud on road, etc; (between entrance and office);
 - cleanliness of site entrance mud on road, etc;
 - cleanliness of site office and surrounds;
 - condition of signs and notice boards;
 - damage to fences and gates;
 - · any fly tipping;
 - odours at various points of the site, note to wind direction;
 - standard of operation;
 - · vandalism of on-site equipment; and
 - completion of the site diary.

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7.5 Reporting environmental performance

- 7.5.1 The Operator will prepare a review of environmental monitoring data every year during the operational life of the site. The reports will be submitted to the Environment Agency at the frequency required in the permit, or as otherwise agreed with the Environment Agency.
- 7.5.2 The report will include the following information:
 - An analysis and review of the environmental monitoring results recorded for the site;
 - a review of the risk management systems provided for the site.

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8 References

8.1.1 The following documents have been referred to in this document:

Reference	Title	Document Number
R1	Waste Classification, Guidance on the classification and assessment of Waste (Technical Guidance WM3) 1st Ed, v1.1	