

ENVIRONMENTAL MANAGEMENT SYSTEM

WATFORD WORKING PLAN

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**ENVIRONMENTAL MANAGEMENT SYSTEM
WATFORD WORKING PLAN**

Contents

INTRODUCTION 4

SITE DESCRIPTION..... 5

1. General Management..... 5

 1.1 Specified site and Materials Recycling/ Waste Management Operations 5

 1.2 Permitted wastes 5

 1.3 Amendments to working plan 6

 1.4 Site staffing 6

2. SITE ENGINEERING FOR POLLUTION PROVENTION AND CONTROL 6

 2.1 Engineered site and drainage systems..... 6

3. SITE INFRASTRUCTURES 7

 3.1 Provision of site identification board 7

 3.2 Site security 7

4. SITE OPERATIONS 8

 4.1 Control of Mud and debris 8

 4.2 Potentially polluting leaks and spillages 8

 4.3 Fires and other Emergencies on site 9

 4.4 Waste acceptance and storage procedures 9

 4.5 Waste quantity measurement system..... 10

 4.6 Handling and Storage of wastes with specified hazardous properties or forms 10

 4.7 Removal of residual wastes from site 11

5. Pollution Control, monitoring and reporting 11

6. Amenity management and monitoring 11

 6.1 Control, monitoring and reporting of dust and particulates..... 11

 6.2 Control of Odours..... 11

 6.3 Control of pests 11

 6.4 Control of Scavenging Birds..... 12

 6.5 Control of litter..... 12

 6.6 Noise..... 12

 6.7 Vibration..... 13

7. Site Records..... 13

**ENVIRONMENTAL MANAGEMENT SYSTEM
WATFORD WORKING PLAN**

7.1 Security and availability of records 13

7.2 Records of waste movements 13

7.3 Site Diary 14

APPENDIX 1 – Schedule of waste categories..... 15

APPENDIX 2 - Annual tonnages by waste category..... 16

APPENDIX 3 - Site Map..... 17

APPENDIX 4 – Permit area / Waste exemption map..... 18

APPENDIX 5 – First In / First Out Process..... 19

Environment Management System

KERVILLE PROPERTIES LTD

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Colne Way Industrial Estate
Colne Way
Watford
Hertfordshire
WD25 9WY

RESOURCE RECOVERY FACILITY

INTRODUCTION

The current waste management licence / environmental permit held at the Watford Depot, is under the name of Kerville Properties Ltd, this is controlled and owned by PB Donoghue (Construction) Watford Ltd.

The site is operated under the banner of P B Donoghue Waste Management and has been in control of the Watford Depot since 2007.

Kerville Properties transfer station permit number reference is WML80526. (EPR/CP3293LZ)

Site Environmental Permit

A copy of the site environmental permit will be kept on site for reference by staff or the Environment Agency.

This document comprises of: -

1. The site environmental management system (also known as working plan)
2. Supporting documents

ENVIRONMENTAL MANAGEMENT SYSTEM WATFORD WORKING PLAN

SITE DESCRIPTION

1. General Management

1.1 Specified site and Materials Recycling/ Waste Management Operations

The Licensed Site Transfer Station is a recycling centre for the deposit, storage, treatment and transfer of materials listed in permit number EPR/CP3293LZ / WML80526. Physical treatment via manual, plant and MRF technology is to be undertaken at the site which will include manual sorting, separation, screening, crushing, and compaction of waste into different components for recovery. These physical treatments will include manual sorting and mechanical systems within the confines of the main waste building and where permitted, externally. The recycled fractions will then be stored in external secure bays benefiting from hard standing.

Permitted Wastes

The wastes to be stored, transferred and recycled are as set out in table 1.1 of the environmental permit. Wastes to be recycled include but are not limited to plastics, hardcore, concrete, metals, textiles, fines and soils.

Hours of operation

Monday – Friday	07.00 to	17.30
Saturday	07.00 to	13.30

The site is closed Sundays and Bank Holidays.

Exempt waste management operations

Waste material that is processed under a waste exemption, will be segregated from the waste material processed under the site environmental permit.

Appendix 4 drawing shows the areas and activities that exemptions are identified and the areas and activities that take place under the environmental permit.

1.2 Permitted wastes

Waste material and quantities accepted at the site include inert and general waste, defined as Category A, Category B(i) and Category B(ii) wastes by table 1.1 and 1.2.A of the permit. Waste material to be recycled include cardboard, timber, ferrous and non-ferrous metals that are waste, and aggregates comprising soils, brick, hardcore and similar. Operations have also been extended to include plastic, paper, and plasterboard recovery.

Appendix 1 of the old working plan lists the waste types in greater detail and is attached. Appendix 2 of the old working plan detailing quantities of wastes is now updated with regard to the last permit changes.

Excluded waste includes:

1. Liquids and sludge.
2. General putrescible household, commercial and industrial waste.
3. Difficult waste.
4. Clinical waste.
5. Special Waste.
6. Wastes which are mixed with the excluded wastes.

ENVIRONMENTAL MANAGEMENT SYSTEM WATFORD WORKING PLAN

A copy of the site licence and working plan / management system will be available within the main brick-built site office.

As per licence conditions all site staff shall be or shall work under the direct supervision of a member of staff who is fully conversant with the conditions of the site licence relevant to their role.

1.3 Amendments to working plan

Kerville Properties shall give the Agency prior notice in writing of any proposed changes as per table 1.3 in Environment Permit.

1.4 Site staffing

The site will be staffed at all times within the hours of operation by at least one person conversant with the site licence and conditions, including:

- Waste acceptance and control procedures
- Operational controls
- Record keeping
- Site inspection
- Emergency Procedures
- Maintenance
- Notification to the Agency

Site staff will be anticipated to comprise of 1 manager, 1 supervisor (who is also the weighbridge clerk), 4 machine operators and 8-12 labourers (pickers).

The WAMITAB COTC Holder for Watford depot is Gary Enright, date of birth [REDACTED]. COTC holds certificate in Treatment and Transfer of Non-hazardous Waste. In periods of holiday or extended illness the COTC holder will be COTC from Cricklewood depot, who will attend Watford depot as per requirements.

2. SITE ENGINEERING FOR POLLUTION PROVENTION AND CONTROL

2.1 Engineered site and drainage systems

The Transfer Station and yard is impermeably surfaced with concrete. The surface was constructed under formal Construction Quality Assurance systems and was warranted under the Design and Build contract for the facility. All areas where the waste is deposited in the buildings or where products will be stored are impermeably surfaced. The surfaces throughout the site will be inspected regularly, not less than once per month, to establish their ongoing integrity. In the event of any breaking or cracking, the area will be identified, and repairs will be made as soon as is operationally practicable.

1. Drainage from the front of the main shed building leads to foul sewer via class 1 interceptor.
2. Foul sewer leads north from main yard area to a Klargester interceptor. The Klargester has a dam system with a pump to control excessive water pollution in event of serious spillage.
3. Uncontaminated water from the roof of the main shed, leads to soakaways positioned at each corner of the shed.

ENVIRONMENTAL MANAGEMENT SYSTEM WATFORD WORKING PLAN

Drainage infrastructure will be regularly inspected for its condition and any damaged components will be repaired or replaced as soon as is practicable. The results of these inspections will be recorded within the site diary.

Storage of oils, fuels or associated liquids are required to be stored within licensed area for operational reasons. Where liquids are to be stored within the transfer station, they will be stored in accordance with the Oil Storage Regulations and associated guidance's. Diesel tanks are designed with a double skin bund, to ensure spills are controlled. In addition, ad-blue container is also banded to appropriate capacity. All bunds will be guidance requirements, 110% of the storage capacity.

All working components of the diesel tanks and ad-blue, will be inspected regularly to maintain good working condition and prevent spillages and leaks.

Assorted free standing containers and drums located on site will be stored on banded spill trays.

3. SITE INFRASTRUCTURES

3.1 Provision of site identification board

The site identification board will be sited outside of the main site entrance and will be clearly visible.

The ID board will be inspected weekly and in the event of damage, will be repaired within a suitable time frame.

The site identification board will be sited at the main site entrance and will be clearly visible. It will display the following information:

- 1) Site name and address.
- 2) Licence holder name.
- 3) Operator name.
- 4) Permit number.
- 5) Emergency name and contact telephone number.
- 6) Statement that the site is licensed by the Environment Agency.
- 7) EA numbers, for General Enquiries (03708 506 506) Emergencies (0800 80 70 60).
- 8) The days and hours of site is open to receive waste.

3.2 Site security

Access to the site is via a 4 to 5-metre-high steel panelled gates and fencing which are kept locked whenever the site is empty, in order to prevent out of hours access to the site. Up to 3 to 4 metre (approx..) fencing continues around the entire perimeter of the site, with the west peripheral boundary protected by concrete wall.

The fences and boundary will be inspected frequently and where repairs are deemed necessary, these will be completed as soon as is operationally practicable. Records of these inspections will be made and recorded within the site diary. The directors of the Company and the site management team will be in sole possession of the keys to the entrance gates.

ENVIRONMENTAL MANAGEMENT SYSTEM WATFORD WORKING PLAN

A CCTV system is installed, which can be remotely monitored by Managing Director. It comprises of cameras capable of recording in the hours of darkness. The video cameras can also be utilised in verifying and validating the description of waste delivered to the site.

A night watchman (security) is also in full time employment to ensure against unauthorised access during hours outside of operation. The night security completes regular walk around checks at specific points as per site security electronic tagging system.

This will satisfy the requirements laid down in table 3.2 of the permit.

4. SITE OPERATIONS

4.1 Control of Mud and debris

The entire site, which encompasses the licensed transfer station facility, is concreted with impermeable surface. Access to the site is made from the Colne Way public highway, via a service road and it is not anticipated that mud or debris is likely to enter the site from this source.

Company dust and emission management plan is in place that describes the control measures and procedures at Watford depot.

Waste types that are accepted into the Transfer Station have the possibility to be a source of environmental emissions and debris. Therefore, it is possible that mud and debris could be transported from site onto the public highway, although, the service road acts as a rumble path that will dislodge any mud or debris before entering on to Colne Way. The service road is approximately 85m in length.

A mechanical sweeper is employed full time to ensure that debris and mud are kept under control.

Site operatives regularly litter pick and manually sweep within and outside the licensed facility area, preventing debris from leaving the site.

All loaded vehicles leaving the site will be secure and sheeted, which will aid in minimising any risk of debris befouling the public highway.

The Colne Way public highway is inspected daily to ensure that the highway remains free from mud and debris. These inspections will highlight any actions required. The results of these inspections will be recorded within the site diary and any remedial action taken.

Drivers will inspect their vehicle before leaving site, paying specific attention to between the tyres. If identified, debris will be removed, and vehicle washed down.

4.2 Potentially polluting leaks and spillages

4.2.1 Maintenance and repair schedule

There is a planned maintenance schedule for all equipment that is associated with the transfer station. The main plant machines operating within the depot are as follows; however, workshop department hold the exact maintenance schedule.

Description	Make	Description	Make
360 Excavator	JCB x2	Shredder	Polaris
360 Excavator	Doosan	Generator	MEMS
360 Excavator	CAT 311	Dust Cannon	Dehaco
Mini 360 Excavator	Doosan	Power Screener	Warrior
Shovel	Doosan	Trommel	Kiverco

ENVIRONMENTAL MANAGEMENT SYSTEM WATFORD WORKING PLAN

Maintenance beyond the expertise of the workshop department, site management and staff are handled by qualified external contractors.

4.2.2 Potentially polluting leaks and spillages

The types of waste that are accepted into the Transfer Station will not be in a liquid state and it is highly unlikely that any leaks or spillages will occur.

The only foreseeable leaks or spillages will be from site plant machinery, company HGVs or above ground diesel tanks. Watford Depot receive external vehicles for collections and deliveries, e.g. fuel. External vehicles are also a potential foreseeable risk.

Measures to control an incidence of leaks or spills-

- 1) A spill kit is sited in the pedestrian area adjacent to main yard and diesel tanks.
- 2) Regular maintenance of equipment to manufacturers specification.
- 3) Klargester interceptor will contain minor leaks or spills.

See environmental document and fire prevention plan for further details.

4.3 Fires and other Emergencies on site

The following preventative measures will be adopted and observed:

- No wastes will be burned on site.
- The driver of any load that is on fire, or is suspected of containing a fire, will be directed to a remote location away from anywhere there is combustible materials stored on site. The emergency services will be alerted immediately.

A company Emergency plan and Site evacuation procedure is in place and all staff are inducted and trained in them.

There is 1x FAW and 1x EFAW trained first aiders on site, and it is the company's view that this number will be maintained for future best practice.

There is 4x designated fire marshals during the day whose job it is to ensure complete evacuation of the site in the event of fire or emergency. The night-time security guard is also fire marshal trained.

Company fire risk assessment and fire prevention plan are in place which shows depot fire prevention control measures. The FPP will be implemented in an emergency and will be referenced regularly as a preventative measure.

Any incident of fire will be reported to the Environment Agency.

4.4 Waste acceptance and storage procedures

All waste loads that are received at Watford depot will stop firstly on the weighbridge. The load will be weighed by the weighbridge clerk. The driver will come to the office window and confirm customer order number; in addition, confirm the waste type. Inspection of the load takes place via CCTV positioned high above weighbridge. If required, visual inspection will take place. Computer system will be updated to confirm customer order. Driver will unload the waste in the appropriate area, e.g. tipping hall. To ensure waste material suitability, random load audits take place.

As per the company first in / first process, this ensures processing times are within 72 hours, in relation to our mixed waste. See appendix 5.

As per the FPP guidance, maximum height of waste material will be stored at 4m.

ENVIRONMENTAL MANAGEMENT SYSTEM WATFORD WORKING PLAN

Inert waste is stored outside of the main tipping hall. Arrangements are made daily to remove inert waste. Where inert waste has not been removed on the day of receipt, plant operators will ensure inert waste material is rotated to ensure inert waste is not stored for longer than 1 month.

Both processing times is in accordance with our permit conditions.

Vehicles exiting the depot that have a load on will stop on the weighbridge to be weighed out. Details will be added to the computer and waste ticket (transfer note) will be produced. The following information will be on a waste ticket:

- Date and time of waste delivery
- Vehicle registration mark
- Waste description and EWC code
- Origin of the waste
- Gross weight (tare and net will be taken on the vehicles exit unless known)
- Customer
- Waste carriers license number
- SIC Designation
- The declaration "I confirm that I have fulfilled my duty to apply the waste hierarchy as required by regulation 12 of the Waste (England and Wales) Regulations 2011".

On occasions, Watford depot receive waste material from external customers, however, these are prearranged and authorised. In addition, external collections take place for certain waste material. Vehicles belonging to external collections will weigh in empty and wait to be loaded. When loaded, external vehicle will weigh out and transfer note will be produced with the information given above.

In the event that a non-permitted waste is identified during the waste reception process, it will be placed in the quarantine area. Arrangements will be made to contact the customer, if identified. If the customer cannot be contacted, then further arrangements will be made to remove the non-permitted waste by a suitable and licensed waste contractor.

PB Donoghue will ensure external contractors have a registered waste carriers license. This will be completed by receiving a copy of carrier's license or confirming via Environment Agency public register.

All transfer notes will be kept for 2 years either as an electronic record or as a paper copy in secure filing cabinet as required by the site licence.

4.5 Waste quantity measurement system

All waste material entering and exiting the site will be recorded on weighbridge ticket and company weighsoft computer system. All weighbridge and waste transfer notes and records will be kept for a minimum of two years.

Waste returns will be collated and sent to the Environment Agency on a quarterly basis.

4.6 Handling and Storage of wastes with specified hazardous properties or forms

Any loads of permitted waste which may contain the features of dust, odour, likelihood of attracting pests and scavengers or light waste shall be handled and stored in accordance with table 4.6 of the permit.

ENVIRONMENTAL MANAGEMENT SYSTEM WATFORD WORKING PLAN

4.7 Removal of residual wastes from site

Section 4.7 of the permit describes the process to take place by the EA if they have reasonable grounds that operations has ceased.

5. Pollution Control, monitoring and reporting

The permit states that no conditions are necessary under this section.

6. Amenity management and monitoring

6.1 Control, monitoring and reporting of dust and particulates.

A system of monitoring and inspection will be undertaken in order to ensure control of dust or particulates. The site management will undertake inspections (no less than twice daily) of the site and record any instances of dust within the site dairy. Site management will ensure the dust suppression system is in operation.

Site management will follow the requirements of Watford depot dust & emissions management plan (DEMP).

Watford depot DEMP indicates dust suppression locations, from sprinkler heads (eyelets) along the apron of the main tipping hall, sprinklers along fence by weighbridges and dust cannon at front of main tipping hall.

The pressure washer / water hoses are used around the yard to damp down the ground surface and loading of vehicles, when required, to reduce dust and highways remain free from dust, mud etc is on site.

The dust cannon and sprinkler heads on the tipping hall apron will deal with any dust generated as a result of sorting activities. In total the heads on site should eliminate any dust or particulate emissions leaving the site. The portable hoses can, as we have said, be utilised at any point on the boundaries if conditions require.

In dry conditions the dust suppression system will be employed during loading and sorting activities. In wet weather a managerial decision will be taken with regards the use of the system.

The yard benefits from the company road sweeper that is employed between both depots, to aid in controlling dust/mud within the larger areas and highways when required.

6.2 Control of Odours

PB Donoghue are predominately construction and demolition waste management and do not accept putrescible waste to be deposited on site. It is felt unlikely that the waste types deposited on site will give rise to any offensive or noxious odours.

As part of the daily inspection regime, depot management will also undertake regular olfactory inspections around the licensed site boundaries and report their findings within the site diary. If there are any patterns of odour issues that emerge, an odour control review will take place by management and a system will be investigated, based on the onsite dust suppression system. In addition to these procedures our accepted operational practice is that any putrescible waste accidentally delivered to site will be processed and removed within a suitable time frame, limiting any possible biodegradation of waste.

6.3 Control of pests

The site shall be inspected on a regular basis, being at least once per day, for evidence of pests. These inspections will be carried out by a member of the site management team.

ENVIRONMENTAL MANAGEMENT SYSTEM WATFORD WORKING PLAN

Pests are not considered to be a serious issue at this stage due to the nature of the materials being handled; though with the close proximity of a railway line and other existing businesses on the industrial estate there may be a risk of vermin being imported onto the site. Importation of vermin is also possible from customer's waste and waste containers being delivered to this site. The operational turnover of waste will also deter any rodent habitation, reproduction or possible visitation for food. A professional pest control service is employed who make regular visits, generally on a monthly basis.

Records of site inspections for pest control will be recorded and entered in the site diary when required.

6.4 Control of Scavenging Birds

The site shall be inspected on a regular basis, being at least once per day, for evidence of scavenging birds. These inspections will be carried out by a member of the site management team. Scavenging birds and pests are not considered to be a serious issue at this stage due to the nature of the materials being handled. The operational turnover of waste will also deter any scavenging activity or cyclical visitation for food. A professional pest control service is employed when required, and these can be utilised on a call out basis if scavenging animals or birds become an issue, as highlighted in the site diary.

Any records will be recorded in the site diary.

6.5 Control of litter

All mixed wastes being delivered to the transfer station will be deposited inside the tipping hall which will minimise windblown litter escaping from the site. Five-metre boundary fencing will be in place to also aide in ensuring that there is no litter being blown off site. The boundary of the licensed site will be inspected daily and neighbouring sites, to ensure no fugitive litter has escaped the site. All vehicles will be required to have loads sheeted when they arrive on site and if they are taking materials from the transfer station, they will be checked to make sure that they are securely loaded and sheeted. All inspections and litter picking operations will be recorded within the site diary and will be undertaken throughout the day. Any fugitive windblown litter will be collected by the end of each working day. Any remedial action will also be recorded within the site diary.

If a trend is identified that litter is escaping site, an investigation will be undertaken to determine the cause of the escape and appropriate action implemented to prevent this escape happening again.

6.6 Noise

Noise nuisance had not been a major issue with regard to impact on the amenity of the neighbours to the site. Plant machines and equipment that is employed on a daily basis is acoustically insulated where appropriate. Most of the plant machines and equipment is sited within the confines of the tipping hall and so any noise generated is shielded and reduced by the tipping hall structure.

The site operating hours are in accordance with the planning permission. Noise will be monitored, and operation will always continue with best practice and the amenity of neighbours in mind. Noise will be monitored and information regarding it will be recorded within assessments and site diary where required.

Any instances of complaints from neighbours will be investigated immediately and thoroughly. If any unexpected pattern of noise nuisance becomes apparent, then the company will investigate any practicable means of dealing with said nuisance.

ENVIRONMENTAL MANAGEMENT SYSTEM WATFORD WORKING PLAN

6.7 Vibration

With the nature of the waste management business, involving heavy plant, machinery and vehicles depositing and sorting waste, there will always be some instances of vibration within the site. The site has never received any complaints regarding vibration, and it is surmised that these vibrations will not travel beyond the boundaries of the site.

General monitoring of the instances of vibration within the site, at the boundary and beyond the boundary will be undertaken and any concerns will be recorded within the site diary.

Any unforeseen complaints that are made to the company will be investigated immediately and thoroughly. These complaints will be logged as per our incident reporting system under our quality management system (QMS). Incident reports will be made available upon request. The site contact details will be displayed on the site notice board in order to allow easy communication for any neighbours who believe they have felt unacceptable vibrations emanating from the site. It is hoped that this will allow any issues to be handled immediately, rather than the company attempting to deal with anecdotal incidents.

The site static and mobile plant employed is maintained by an internal fitter to manufacturer's specification in order to maintain optimal performance. Site Management has undertaken numerous surveys at the boundaries and in neighbouring premises and this plant on its own does not give rise to vibration nuisance. The machine operators have also been instructed to operate this plant with neighbours' amenity in mind, e.g. no dropping of the bucket, no inappropriate use of the horn, etc.

The 360-excavator situated in the shed currently sits on a plinth or inert material which provides adequate absorption of any vibration this plant creates. The machine is also maintained to manufacturer's specification. Wheeled material handlers have rubber tyres, as does the loading shovel.

All company employees have been instructed during their induction to be mindful of possible noise and vibration during the loading and unloading of skips and plant machine operations. It is also company transport procedure that empty skips must be returned to the back of the vehicle before vacating the tipping area. This alleviates unnecessary noise and vibration that could attributed to tipping operations.

7. Site Records

7.1 Security and availability of records

All waste deposited at the site will be recorded and periodic returns will be made to the Environmental Agency as required by the permit. These will be held in accordance with Table 7.1 of the permit, on paper in a secure location (at head office) or on computer file and backed up to company servers. They will be kept for a minimum of two years.

7.2 Records of waste movements

Further to 7.1, each load entering and leaving site will be recorded on a Waste Transfer Note, stored on paper or on the dedicated weighsoft software files.

<p style="text-align: center;">ENVIRONMENTAL MANAGEMENT SYSTEM WATFORD WORKING PLAN</p>

7.3 Site Diary

A site diary will be kept and secure by the site TCM. It is completed everyday by the TCM, and all required information is recorded. Site diary will be available to anyone upon request, e.g. EA officer

**ENVIRONMENTAL MANAGEMENT SYSTEM
WATFORD WORKING PLAN**

APPENDIX 1 – Schedule of waste categories

Category A. Inert Waste	Category B (i) General Waste
Subsoil	Wood (including sawdust, sander dust)
Topsoil	Paper (including tarred and oiled paper)
Hardcore	Cardboard, fibreboard and wood products (including hardboard and chipboard)
Brickwork	Plastics
Stone	Plasterboard
Concrete	Leather (excluding leather processing waste)
Clay	Wool, cotton, linen, hemp, sisal and any other material or manmade fibre
Plaster	Cork, ebonite kapok
Sand (including clean foundry and moulding sand)	Shot blasting residues
Silica (excluding finely powdered)	Silicate slag (toxic metal slags excluded)
Excavated road material (well weathered)	Boiler scale
Glass, pottery, china, enamels, ceramics, mica and abrasives.	Carbon, Kieselguhr, diatomaceous earth
Excluded from this category – all sludge and liquids.	Calcium Carbonate, calcium sulphate, calcium chloride, magnesium carbonate
	Ash and clinker (Excluding pulverised fuel ash and vanadium contaminated ash)
	Fully burnt incinerator residues
	Cement
	Excluded from this category- all sludge or liquids
Category B(ii) - Metal waste - General waste that is scrap metal	
Domestic appliances	Electrical fitting and fixtures
Light industrial machinery	Office furniture and equipment
Light ferrous metal scrap that is waste	Light non-ferrous metal that is waste
Computers and other electronic equipment	

**ENVIRONMENTAL MANAGEMENT SYSTEM
WATFORD WORKING PLAN**

Other Wastes

Small quantities of the following wastes associated with normal household waste'. Hazardous household wastes, household chemicals, e.g. paints, thinners, solvents, pesticides.
Flammable gases in pressurised containers for domestic usage only- propane, butane etc.

Specific Exclusions

Clinical wastes from non-household sources, sharps and stoma bags

Liquids and sludge

Any waste from the previous categories will not be accepted if they are mixed or contaminated with the specifically excluded wastes

APPENDIX 2 - Annual tonnages by waste category

<u>Waste Category</u>	<u>Annual Tonnage</u>
Category A	10,000
Category B(i)	64,700
Category B(ii)	300
Other Wastes	5

**ENVIRONMENTAL MANAGEMENT SYSTEM
WATFORD WORKING PLAN**

APPENDIX 3 - Site Map



**ENVIRONMENTAL MANAGEMENT SYSTEM
WATFORD WORKING PLAN**

APPENDIX 4 – Permit area / Waste exemption map



**ENVIRONMENTAL MANAGEMENT SYSTEM
WATFORD WORKING PLAN**

APPENDIX 5 – First In / First Out Process

