PESTS MANAGEMENT PLAN

Gerrard Place, Skelmersdale WN8 9SU

W L Polymer Ltd

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Oaktree Environmental Ltd

Waste, Planning & Environmental Consultants

Oaktree Environmental Ltd, Lime House, 2 Road Two, Winsford, Cheshire, CW7 3QZ
Tel: 01606 558833 | Fax: 01606 861183 | E-Mail: sales@oaktree-environmental.co.uk | Web: www.oaktree-environmental.co.uk
REGISTERED IN THE UK | COMPANY NO. 4850754

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1 Introduction

1.1 General

1.1.1 Oaktree Environmental Ltd has been instructed by W L Polymer Ltd to prepare a Pests Management Plan ("PMP") for their facility at Gerrard Place, Skelmersdale WN8 9SU. The site is operated as a physical treatment facility comprising the acceptance storage and treatment of non-hazardous waste comprising predominantly plastic. Recycled product arising from the above treatment process will comprise plastic film and agglomerate which would be exported as a product for onward manufacturing; and, plastic pellet which will typically be sold domestically for re-use. Other wastes such as metal, paper/card labels, sorted and mixed packaging, mixed co-mingled and dry mixed recyclables may also be accepted at the site but only for bulking and transfer and no physical treatment.

1.1.2 It is considered pests could arise during the acceptance, tipping, sorting and storage of waste to be accepted at the site. Activities for this waste initially will comprise manual sorting and compacting by hand and mechanical grabs.

1.1.3 The site is operated in accordance with an Environmental Management System (EMS) and Fire Prevention Plan (FPP) along with other documents targeted to specific environmental considerations including this PMP.

1.1.4 In addition to this PMP, the site will be operated in accordance with an Environmental Management System (EMS) and Fire Prevention Plan (FPP) along with other documents targeted to specific environmental considerations.

1.1.5 This PMP will allow W L Polymer Ltd to implement an action plan should the site operatives detect pest presence, receive complaints from local business or residents and if the EA suspects the presence of pests from the site during an inspection.

1.2 Site Location

1.2.1 The site is located on Land at Gerrard Place, Skelmersdale WN8 9SU. The national grid reference for the site is SJ 98016 55191.

1.3 Hours of operation

1.3.1 The site will operate on a 24/7 basis comprising two 12-hour shift patterns. A breakdown of the operating hours is as follows:

- Waste acceptance and removal = 24/7
- Waste processing = 24/7
- Plant maintenance and full site housekeeping comprising manually cleaning processing plant inside the Units = Continuous throughout operations

1.3.2 As the site is run on a 24/7 basis, there are two separate shift patterns which are 06:00 – 18:00 and 18:00 – 06:00.

1.4 Reviewing and monitoring this PMP

1.4.1 This document will be due for review two years from the date of approval, or, as a result of any incidents which may lead to the requirement for immediate review or the PMP guidance changing, whichever is the sooner. The circumstances which would warrant a review are the following:

- Experiencing an pest incident
- Additional waste streams with pests potential to be accepted on site.
- Increase waste volumes accepted and stored.
- Development of site infrastructure – new buildings.
- Installation of new equipment or plant – baler/loading shovel/sort-line/ etc.

1.4.2 Reference should be made to Section 4.10 which details procedures for staff training in the event of any changes in relations to the PMP.

1.5 Waste Types and Quantities

1.5.1 The waste types handled on site considered to cause pests will comprise household, commercial and industrial wastes as defined in the Controlled Waste (England and Wales) Regulations 2012 and Section 75 of the Environmental Protection Act 1990.

1.5.2 The maximum amount of waste to be stored on site at any one time is shown on Drawing No. GPL/3329/03 with residence times for each waste type.

1.5.3 If the maximum storage capacity is reached then no further waste will be accepted until waste can be removed from the site and taken to a suitably permitted or exempt site.

1.5.4 The table overleaf details a summary of the wastes types which will be accepted and stored at the site with the potential to cause pests.

Table 1.1 – Waste storage table showing wastes with the potential to attract pests

Plan Ref	Description	EWC code/s	Storage type	Containment	Height / width of firewall (m)	Max Width (m)	Max Length (m)	Height (m)	Max area (m2)	Conversion factor used	Volume (m3)	Maximum storage durations	Comments
AREAS 1 - 4	Bays for unloading mixed waste streams for sorting and separation (waste may also contain as shown in AREAS 5-7)	Mixture of 15 01 01, 15 01 02, 15 01 06, 15 01 07, 19 12 02, 19 12 03, 19 12 04, 19 12 12, 20 01 01, 20 01 39, 20 03 01	Waste could be baled or loose	Concrete panel & concrete interlocking block fire walls	4 / 0.3 & 0.8	20	7	3	140	1	420	<31 days	Any wastes which could give rise to pests would be removed within 48 hours
AREAS 4 - 7	Bays for unloading mixed plastic prior to treatment (waste may also contain as shown in AREAS 1-4))	The above codes	Waste could be baled or loose	As above	4	20	7	3	140	1	420	<8 weeks	Any wastes which could give rise to pests would be removed within 48 hours
AREA 8	Pre-processing	15 01 02, 19 12 04	Waste could be baled or loose	As above	4	8	6	3	48	1	144	<24 hours	Area will continually load wastes into the pre-treatment area inside the building
AREA 9	Mixture of baled material and product storage	19 12 04	Baled / processed	Concrete panel fire wall of building	6	5	5	3	25	1	75	<8 weeks	This area will only store waste in the event the baler is used because the wash & extrusion plants have been decommissioned
AREA 10	Mixture of baled material and product storage	19 12 04	Baled / processed	Concrete panel fire wall of building	6	5	8	3	40	1	120	<8 weeks	As above

1.5.5 Prior to arranging a waste delivery at the site, the operator will request confirmation of the contents to be placed in the delivery vehicle carrying the waste so in the event the below wastes are accepted, they can be stored and removed as detailed below. The table below details the EWC codes for all wastes which have the potential to cause which could be accepted into the site. The columns to the right indicate the level of risk associated to the waste type using a **high**, **medium**, **low** risk basis. As discussed, the site will only routinely store the wastes stored in the table on the previous page.

Table 1.2 – Accepted wastes with pests potential

EUROPEAN WASTE CATALOGUE - COMMISSION DECISION 2000/532/EC		Pests potential -
CODE	**WASTE TYPE**	
02	**WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING**	
02 01	**wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing**	
02 01 04	waste plastics	Medium
07	**WASTES FROM ORGANIC CHEMICAL PROCESSES**	
07 02	**wastes from the MFSU of plastics, synthetic rubber and man-made fibres**	
07 02 13	waste plastic	Low
15	**WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED**	
15 01	**packaging (including separately collected municipal packaging waste)**	
15 01 01	paper and cardboard packaging	Medium
15 01 02	plastic packaging	High
15 01 03	wooden packaging	Low
15 01 04	metallic packaging	Medium
15 01 06	mixed packaging	High
15 01 07	glass packaging	Medium
15 02	**absorbents, filter materials, wiping cloths and protective clothing**	
17	**CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)**	
17 02	**wood, glass and plastic**	
17 02 03	plastic	Medium
19	**WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE**	
19 12	**wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified**	

EUROPEAN WASTE CATALOGUE - COMMISSION DECISION 2000/532/EC		Pests potential -
CODE	**WASTE TYPE**	
19 12 01	paper and cardboard	Medium
19 12 02	ferrous metal (baled cans only)	
19 12 03	non-ferrous metal (baled cans only)	
19 12 04	plastic and rubber	Medium
19 12 12	co-mingled dry mixed recyclable wastes	High
20	**MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS**	
20 01	**separately collected fractions (except 15 01)**	
20 01 01	paper and cardboard	Medium
20 01 39	plastics	Medium
20 03	**other municipal wastes**	
20 03 01	mixed municipal waste	High

1.6 Site Management

1.6.1 The site will have a Technically Competent Managers (TCM) who is responsible for the general management of the site including the acceptance and handling of any wastes with the potential to cause pests.

1.6.2 The company, through the TCM, will ensure that a nominated deputy is sufficiently trained and familiar with all site management documentation (which includes this PMP) in addition to all relevant company procedures who, in the absence of the TCM, will act the competent person.

1.7 Types of pests

1.7.1 **Flies -** The table below illustrates the species of fly which can sometimes be associated with waste sites of this type and potentially become a nuisance:

	Common housefly *Musca domestica* Medium		Lesser housefly *Fannia sp.* Medium
	Scuttle fly *Phoridae* 'Black-eyed'		Scuttle fly *Phoridae* 'Black-bodied'
	Drain fly *Psychodidae* small		Fruit fly *Drosophilidae* small

1.7.2 Common house flies are readily distinguished from the other smaller fly species that are likely to be captured on traps at W L Polymer Ltd. Larger flying insects such as blue bottles, green bottles, wasps and bees are unlikely to be present in significant numbers since they are not attracted to materials on site.

1.7.3 The life cycle of the common house fly is summarised below to give an approximate indication of the timescales involved from egg laying to growth into mature flies that can reproduce. Timescales vary according to temperature etc. for example:

a) Egg: A female common house fly can lay up to 150 eggs per batch and can produce up to 6 batches of eggs, which typically hatch within a day or so of being laid.

b) Larva: Also known as maggots. They are legless and white in appearance. They pass through three instars and can complete their development in as little as 3 days at optimum temperatures (30 - 35^{O}C), after which they pupate.

c) Pupae: The pupa is contained within the last larval skin, which tans and hardens. The adult emerges after a minimum of 3 days depending on temperature.

d) Adult: Female common house flies are able to reproduce within two or three days of hatching. In captivity they can live for up to a month but a more typical lifespan for an adult in the wild is approximately a week. The life cycle of a housefly takes a minimum of 10 days at optimum temperature (35^{O}C), but this can extend to several weeks or even months in cold conditions. The short life cycle that is typical of the summer months is the reason why this species is mainly a problem at that time of year. Control measures may be necessary to disrupt the lifecycle and reduce fly populations to ensure that receptors on site and those near the site are not adversely impacted.

1.7.4 **Vermin –** The other type of pests that can sometimes be associated with waste sites of this type is vermin i.e. rodents, insects etc.

1.7.5 **Scavenging Birds –** Given the possibility of small amounts of potentially putrescible wastes at the site, scavenging birds are also considered to be a risk.

2 Risk assessment

2.1 Methodology

2.1.1 This PMP has been completed to identify where the likely risks are in relation to surrounding land uses. This assessment has been used to inform Section 5.0 of this PMP with regard to specific monitoring procedures.

2.2 Receptor sensitivity

2.2.1 Table 2.1 below outlines the receptor sensitivity to pests which will be used when determining nearby sensitive receptors:

Table 2.1 - Receptor Sensitivity Criteria for pests

Sensitivity of Receptor	Criteria
Low	Industrial workplaces
Medium	Industrial workplaces / Residential >250 m
High	Residential areas <200m

2.3 Sensitive Receptor Locations

2.3.1 The sensitive receptors in proximity to the site are shown on Drawing No. GPL/3329/04. The nearest residential receptors are situated on Sandon Street which is approximately 360m northeast of the site. There is also a residential property situated approximately 180m to the south-west of the site, this premises comprises a close family friend of the operator and has therefore been removed as a receptor considered 'Sensitive' as complaints will not arise from this property. If a new resident were to acquire the property, an updated PMP would be submitted to the EA for approval. The owner of the property has also provided a letter confirming they have no reservations about the proposed variation of the permit, this letter is shown in Appendix III.

2.3.2 There is also a proposed housing development which has been granted planning permission to the north-east of the site, consideration of these houses, if they were to be constructed, has also been taken place throughout this PMP.

2.4 List of receptors

2.4.1 The receptors listed from the SRP are also shown in the table below with approximate distances to these properties.

Table 2.2 – Distances to Selected, Representative Sensitive Locations

Boundary	Receptor	Approximate distance from centre of site (m)
North	Residential and small retail properties including workplaces off Wolverton	480
East	Residential and small retail properties including workplaces off Glebe Road	428

2.4.2 Other receptors not shown in the above table are illustrated on Drawing No. GPL/3329/04.

2.5 Background Pest Sources in the Area

2.5.1 Other potentially pest attracting operators, sites or areas are tabulated below in the table below.

Table 2.3 – Other Pest Generating Operators

Company	Address	Type of Business	Approximate distance & location from site boundary (m)
Hills Salvage & Recycling Ltd	Gerrard Place, Skelmersdale WN8 9SU	Waste Recycling Facility	Adjacent / west
White Moss Landfill Ltd	White Moss Rd S, Skelmersdale WN8 9TH	Waste landfill Facility	465 / west

2.5.2 There are also a number of industry and commercial premises situated to the north of the site; which will all have wheelie bins and/or skips stored externally which could generate a smell if not emptied regularly. The proposed residential development including café and train station will also increased the amount of pests in the area due to the storage of household and commercial waste in wheelie bins outside the properties/areas.

2.5.3 Pests could also be attracted as a result of abnormal weather conditions, machinery breakdowns and human error.

2.5.4 In order to determine whether complaints are the result of activities from the site or from other nearby sites an pests complaints form will need to be completed in line with the company's complaints procedure which is attached in Appendix II.

3 Potential sources of on-site pest generation

3.1 General waste - storage prior to processing

3.1.1 This waste would be stored within AREA**S 1 - 8** on Drawing No. GPL/3329/03 comprising waste which has just been tipped.

3.1.2 Whilst these wastes are not commonly associated with pests, they can contain some fine organic materials which can, in some cases, can generate pests because of their smell. This smell is exacerbated following ingress of rainwater which occurs predominantly whilst the wastes are resident in skips/containers at the sites of production and prior to receipt at the site.

3.1.3 Whilst not common, these wastes have the potential to contain materials of a putrescible nature which are not identifiable until the load has been tipped at the site, some items may contain pests within the loads.

3.2 General waste - residual wastes for landfill

3.2.1 These wastes are essentially the lighter, non-recyclable fraction of the arising from the waste treatment process. This material is likely to contain the waste wash water with residual items. This would be stored in containers adjacent to the exit points of the plant. The site will not look to accept any householder/black bin bag items so the residual wastes on site have less potential to cause pests than the original mixed waste input described in Section 3.1 above.

3.3 Foul surface water

3.3.1 In the event of a rainfall incident, the external concreted areas are separately sealed.

3.3.2 In the event of a rainfall incident which leads to flooding, an emergency drainage consultant would be called to the site and water pooling in the external concreted areas of the site would be pumped from site.

3.4 Background sources of pest generation

3.4.1 Potential local off-site sources of pests would be associated with the surrounding commercial/industrial activities and residential areas which are prevalent in the immediate area and the wider areas surrounding the site.

3.4.2 In order to determine whether complaints are the result of activities from the site or from other nearby sites; a complaints form will need to be completed in line with the company's complaints procedure which is attached in Appendix II.

4 Pest control

4.1 Waste acceptance procedure

4.1.1 Strict waste acceptance procedures are in place at the site as shown below and the following details will be recorded for every load deposited at the site:

a) The date and time of delivery.
b) The name and address of the waste producer.
c) The detailed and accurate description of the waste including type, quantity (in tonnes and/or cubic metres) and EWC codes.
d) How the waste is contained e.g. loose, container type.
e) The carrier's name and address.
f) Driver's name, signature and vehicle registration No.
g) Signature or initials of person(s) producing/ accepting/ inspecting/ carrying the waste.
h) Additional handling details/notes made by the driver after inspection of the load.
i) SIC code of the premises which produced the waste (where relevant).
j) Waste hierarchy declaration.
k) Information on previous treatment of the waste e.g. manual or mechanical.

4.1.2 Any wastes identified during the incoming waste inspections which do not conform to site acceptance criteria will not be accepted. If the non-conforming waste is discovered following deposit, the waste will be loaded back onto the tipper vehicle and removed off site or and quarantined immediately in a sealed/covered skip or container to await safe removal.

4.2 Site Operations

4.2.1 Limiting pest potential/attraction from the waste recycling facility can best be achieved through employing effective site management and good general practice. It is much easier to minimise the chance of pests in the first instance rather than dealing with problems when they occur.

4.2.2 This section addresses the general site management guidelines and identifies specific procedures to mitigate against attracting pests at the site.

4.3 Receiving Wastes

4.3.1 Rigorous control of wastes delivered to the site is required, with contaminated or wastes with pests' potential rejected in line with the procedures in the EMS and EP. Trained competent staff are in place to recognise this material and to inspect incoming wastes as it is deposited at the site. Any wastes which attracting pests before tipping will be returned to the producer or sent to another authorised facility for treatment. Waste suppliers and HGV drivers are required to ensure that only acceptable material is brought to site to minimise the incidence of rejection. If staff continually bring wastes which are attracting pests to the site, the operator will initiate their three-strike rule:

a) Additional waste type recognition training (see EMS)
b) A verbal and written warning
c) Refused entry into the site or potentially disciplinary.

4.3.2 The site may accept was from other transfer stations so it is difficult to provide an average age of waste but upon reception of waste after visual checks, any loads which contain significant amounts of pests i.e. flies will be rejected as above.

4.4 Storage of Wastes

4.4.1 The site may regularly store the following wastes at the site which could attract pests:

i) other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 – 19 12 12
ii) Plastic / mixed packaging – 15 01 02 & 15 01 06
iii) Plastic packaging waste – 19 12 04
iv) Light waste (paper / cardboard) – 19 12 01
v) Incoming mixed waste – 20 03 01, 19 12 12)

4.4.2 There may be various other EWC codes within the proposed permit that the site could accept as per Section 1.3.5 but it is considered the above will comprise the most common. Should the site begin to accept other wastes with pests potential into the site, this PMP will be re-submitted to the EA for approval.

4.4.3 Low storage volumes and strict turnaround of wastes on site in accordance with the table on Drawing No. GPL/3329/03 will be observed. Stock rotation procedures as detailed in the site's FPP will be observed to ensure the maximum duration of storage times are not exceeded.

4.5 Loading and Transport of General Wastes

4.5.1 In all cases, the drop heights of mixed waste will be kept to an absolute minimum. All waste vehicles entering/leaving the site containing will be securely sheeted or enclosed at all times to ensure that pests are not at the site or beyond the site boundary via queuing collection/delivery vehicles.

4.6 Housekeeping

4.6.1 Regular cleaning of operational areas (i.e. minimum once daily) such as impermeable surfaces and drainage channels will be carried out using mobile plant and water supplies to discourage degradation of old materials. The site may install other items of housekeeping plant such as a road sweeper to clear up smaller particles of waste which could attract pests. Additional plant can be sourced instantaneously from the surrounding industrial estate. The wastes with pests potential s will then be placed in a sealed rejected waste skip which will be removed every 24 hours or sooner if staff detect pests following daily inspections. Site management will delegate these tasks to operational staff and seek radio or written confirmation that the tasks have been complete and whether any pests have been detected.

4.6.2 In addition to daily visual monitoring of the site; site management will monitor the integrity of onsite bays on a quarterly basis. If there are any issues resulting in pests, then maintenance works will be carried out within 48 hours.

4.6.3 **Housekeeping schedule** - A housekeeping schedule has been produced below and site management will train operational staff via toolbox talks every 6 months or sooner if site operations change to ensure the following housekeeping schedule is strictly adhered to.

- Avoid fugitive emissions through good housekeeping
- Maintain a clean, well-organised site
- Suppress storage bays during dry and hot weather conditions
- Jet spray and disinfect storage bays once per month
- Clean equipment that has been in contact with materials which could attract pests.
- Carry out a deep clean of the reception area once a quarter and record this in the site diary
- The sealed drainage system is functioning
- Concrete surface is sealed to prevent absorption and adsorption of producing residues with pests attraction.
- Solid waste storage containers shall be robust, easily cleanable, designed for safe handling, and constructed to prevent loss of wastes from the equipment during storage. If such equipment is used to store other wet or liquid producing wastes, or wastes composed of fine particles, such equipment shall in all cases be non-absorbent and leak-resistant.
- Periodically treat drainage systems with bacteria-inhibiting solution

4.7 Site Infrastructure

4.7.1 The site will install the following measures to reduce the risk of pests at the site:

- **Monitoring** – The site will carry out daily inspections (minimum once) in and around the site for the presence of pests.
- **Stock rotation** – All wastes with pest's potential will be contained within 3-sided bays or containers that undergo continuous monitoring. The site follows the first in, first out principle which ensures that the oldest wastes are removed from the site first and aren't left to stand for a long period of time.

- **Housekeeping** – The site will carry out regular cleaning (minimum once daily) of all operational areas at the site paying special attention to storage areas which could attract pests. The site has a housekeeping schedule shown in section 4.6.
- **Storage procedures** – All wastes with pests potential are contained within bays or containers. Wastes with pests potential will not be stored for longer than 48 hours ensuring that wastes are not left to stagnate; in most cases, wastes with pest potential will be cleared from the site by the end of the working day.

4.7.2 In the event that there are any issues, maintenance/repair works will be carried out within 48 hours.

4.8 Liaison with Neighbours

4.8.1 In the event of pest complaints due to unforeseen extenuating circumstances, immediate neighbours within 300m will be contacted via phone call or face to face to advise them of the situation and the action being taken. The EA will also be notified.

4.8.2 An open-door policy will be encouraged by the operator to enable any complaints from neighbouring premises (if received) to be dealt with immediately. The complainant will then be supplied with remedial actions taken and any procedures or measures put in place by the operator to reduce or ideally eradicate the likelihood of a subsequent complaint.

4.8.3 If any pest complaints are received, the complaint will be assigned to an operative familiar with the sites operation who will complete a 'complaints and events log' and detailed individually on the complaints form (in Appendix II), both of which will be kept for inspection on request by the EA. Details of information to be completed are dates, nature of complaint, weather conditions at the time of the complaint, investigation details, action taken and a signature (as a minimum). Pest complaints will be investigated and responded to within 24 hours and suitably reviewed by the site manager who is ultimately responsible.

4.8.4 The operator would also be required to make a note of any unavoidable events plant/equipment malfunctions in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the Council/EA

or directly, any circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed to the cause of the complaint. If there are pests present outside normal operations, the operator will cease operation, investigate and resolve the issue before continuing.

4.9 Training

4.9.1 All employees and sub-contractors of W L Polymer Ltd involved with waste materials and their handling will receive training in basic pest control, identification of infestations (or signs of an infestation) and complaint reporting (management and operations staff).

4.9.2 Training will be given to all relevant persons to make sure they are competent in completing complaint report forms to ensure sufficient monitoring can be carried out.

4.9.3 Specific training in respect of fly control will include the following and will be carried out by internal managers, entomologists and suppliers of the products before staff can use any of the control chemicals:

a) Identification of fly species and fly biology
b) Monitoring techniques
c) Identification of problematic loads
d) Use of fly baits
e) Use/ handling of insecticide Use/ handling of larvicide
f) Use of spray & fogging systems
g) Personal protective equipment

4.9.4 Training for site staff will be conducted using training modules used at induction stage and during the annual re-assessment stage for consolidation. Toolbox talks are also used for specific additional training which may be required as a result of incidents. Subcontractors are trained during their site induction. Training will be undertaken by site management or an entomologist.

5 Monitoring

5.1 Monitoring pests

5.1.1 W L Polymer Ltd will use the following techniques to monitor pests:

a) Visual Monitoring
b) Complaints Monitoring
c) Site Diary

5.2 Monitoring – Pest/Vermin

5.2.1 The presence of pests will be monitored daily by trained personnel, in accordance with the Site Inspection Checklist in Appendix II of the site's EMS.

5.3 Monitoring – Flies

5.3.1 Fly populations will be visually monitored at the site. The data recorded will be retained in the site offices and submitted to the EA as requested.

5.3.2 Visual monitoring of outdoor wastes will be carried out daily and any wastes which are observed with a fly density of significant numbers will either be moved internally or into a container.

5.3.3 Larval monitoring will take place on surface wastes and surrounding floor areas during inspection of incoming to ensure that any problem can be identified. It is difficult to target specific waste types as being more problematical as it is more likely that individual suppliers' waste quality will be the root cause of any larval infestation.

5.4 Preliminary procedures

5.4.1 The purpose of monitoring is to ensure that the measures identified below are working. Where monitoring results demonstrate that control measures are not having the desired

effect then additional remedial actions will be undertaken as specified in this document and as agreed with the EA. The daily site checks include pest monitoring.

5.4.2 Visual monitoring of all storage and processing areas will be carried out with daily, with special attention being made to those areas which are likely to result in pest generation.

5.5 Control measures - General

5.5.1 The site's strict preliminary acceptance procedures will also minimise the risk of receipt of non-conforming wastes. Wastes are visually inspected upon arrival including for the presence of vermin, flying insects or larvae/vermin on the face of the wastes. If there is presence of significant infestation the load requires rejection. Once materials are accepted, they are transferred to the designated storage and processing area and care is taken to ensure that cross-contamination does not occur in order to prevent any potentially contaminated waste affecting other stock.

5.5.2 All staff inspecting materials being delivered to site will be informed of the need to notify a senior manager or supervisor of any possible infestations and make a record of their findings.

5.5.3 Any materials rejected under the company's acceptance and rejection policy will be returned to the originating client as a matter of priority. This process may involve holding the waste for up to 24 hours in extenuating circumstances.

5.5.4 The site operator complies with strict environmental controls for the site, including the clearance of litter and debris from site surfaces and around machinery. Adherence to these procedures also reduces the potential for the build-up of organic debris to occur and thereby reduces the potential for fly-breeding within the debris. Site cleaning procedures will be adhered to at all times to maintain site cleanliness and remove debris, thereby preventing the creation of breeding areas for flies, with corrective action taken as required and logged.

5.5.5 Those wastes which could potentially result in pests will be stored within sealed covered containers and tipping/sorting area will be rotated quickly to prevent wastes from degrading and attracting pests.

5.5.6 Any waste stockpiles where pests are present will result in the stockpile being loaded into a sealed skips and removed off site as soon as practicable. If skips or the destination site are not available immediately, a specialist pest control contractor will be contacted and brought in immediately to eradicate the problem.

5.5.7 If deemed necessary, or if advised by the specialist pest control contractor, stockpiles will undergo treatment using the methods and pesticides listed below:

a) Waste reception and storage areas will be sprayed after receipt to the storage area or after it is discharged from the treatment plant.
b) Internal and External Baits will be positioned throughout the site to deal with any potential presence of vermin i.e. rodents.

5.5.8 It must be noted the site is not intending to stockpile wastes as all wastes other than those being tipped and sorted will be stored within skips.

5.6 Control measures - Flies

5.6.1 If any flies are present on site, these will be managed using various methods, including the use of regulated chemicals to control the various stages of the fly life cycle. The use of all chemicals by staff on site is controlled by the company's health and safety policy. Any fly control products that are used will be used strictly in accordance with the product label.

5.6.2 All operations on site will be carried out in accordance with the relevant requirements of the Health and Safety at Work Act 1974. All staff using non-agricultural pesticides on site will be trained and competent as required by the Control of Pesticides Regulations 1986 (a copy of which will be retained in the site office).

5.6.3 The use of pesticides will be kept under review to ensure that all products in use are approved and are rotated to avoid the potential for resistance.

5.7 Control measures (vermin)

5.7.1 In addition to the general acceptance and housekeeping measures, routine monitoring will be undertaken by site management. Should any visual signs of a rodent infestation be encountered (dropping, sightings etc.), these will be recorded on the daily Site Inspection Form (see Appendix II of the EMS) and baiting and trapping will be installed.

5.7.2 If any activity of ingress by rats is found then bait boxes will be adjusted or increased.

5.7.3 The use of rodenticide will also be considered; however, this is dependent on the nature, location and scale of the infestation and will be decided by site management/consultants at the time.

5.8 Prevention measures (scavenging birds)

5.8.1 With regards to scavenging birds (seagulls etc.), noise activities and movement of vehicles and plant on site tends to deter the birds from actually entering the site. However, the situation will be monitored by the site manager.

5.8.2 Should significant levels (>10) of scavenging birds be identified during site monitoring, management will consider additional potential measures as discussed below.

5.9 Potential reactive measures (scavenging birds)

5.9.1 As stated previously, noise activities and movement of vehicles and plant on site tends to deter the birds from actually entering the site. However, the situation will be monitored by the site manager.

5.9.2 Should significant levels (>10) of scavenging birds be identified during site monitoring, additional measures can be undertaken. These may include:

a) fitting fine mesh grilles to openings.

b) fitting bird repellent strips to reduce the availability of perching points for birds.

c) the use of netting to prevent birds roosting.

d) The use of sonic or ultrasonic bird scaring/repelling devices.

5.10 Complaints monitoring

5.10.1 All complaints will be investigated promptly and appropriate remedial action will be taken if the complaint is validated e.g. remove materials off site as soon as reasonably possible. Complaints will be recorded on the form found in Appendix II.

5.10.2 Complaints to the Local Authority / EA will also be recorded and taken into account. An assessment will be carried out from where the complaint was made and from any convenient locations between the complainant/receptor and the site so that the complaint can be validated or rejected.

5.11 Site diary

5.11.1 If members of the local community are frequently reporting issues in the vicinity, then they will be asked (if agreeable) to keep a diary. This will help to build up an account of when the pests occur and their approximate prevalence, their location and the site operations that were being carried out at the time, as well as the duration of the activities taking place. Any obvious problems can then be addressed.

6 Contingency plans

6.1 Contingencies and emergency plans

6.1.1 In accordance with the EA guidance, contingency plans have been prepared to react to situations 'where monitoring indicates that a potential source of pests is not completely under control, meteorological conditions are unfavourable or that adverse impact has occurred'.

6.1.2 If the presence of pests is detected at the site boundary, monitoring points or a complaint is received, the following remedial procedures will be taken and the contingency measures shown in the sections below will be implemented:

a) Firstly identify the source; is it from:

i) Site operations; or,
ii) An off-site source

b) If on site:

i) Report incidence to the site manager or technically competent manager;
ii) If validated, the TCM will contact the appointed specialist pest control contractor and/or entomologist;
iii) Identify the cause of the pests i.e. leakage, waste storage, etc;
iv) Identify a solution in consultation with the specialist pest control contractor and/or entomologist;
v) Implement a solution, managed by the specialist pest control contractor and/or entomologist;
vi) Carry out olfactory tests to check if fix is working;
vii) Record actions taken on relevant forms and site diary as required by this plan;
viii) Monitoring in conjunction with the specialist pest control contractor and/or entomologist.

6.2 Operational failure

6.2.1 The manager will be contacted by staff in the event of any operational failure such as the breakdown of plant, systems or equipment and will, in turn, contact the contract engineer immediately who will assess major breakdown consequences and identify appropriate contingency measures. This may lead to a build-up of waste or result in waste being on site for longer periods of time. In this scenario, the following step would be taken:

a) Diversion/removal of wastes to alternative permitted waste management facilities from the EA's public register.

6.2.2 Serious operational failures, which result in the closure of the site, will be recorded in the site diary.

6.2.3 All repairs to site security will be made on the discovery of the damage if possible and the site will be made secure until the repair has been carried out.

6.2.4 Any major defects found during the daily site inspection which are likely to lead to a breach of permit conditions will be repaired by the end of the working day in which they are found, where possible. If a repair is not possible by the end of the working day and a potential breach of permit conditions may occur, EA will be contacted to agree a suitable timescale for repair.

6.2.5 All defects and problems likely to give rise to pests will be recorded with repairs/solutions being carried out immediately; neighbours will be alerted if the problem cannot be rectified immediately and provided a timescale when the problem will cease.

6.3 Seasonal fluctuations / alternative outlets

6.3.1 It is considered due to the size of the company that they will not be hampered by seasonal fluctuations. W L Polymer Ltd will be primarily accepting waste from the surrounding area. Under normal operating conditions, there will always be an outlet for the waste material to ensure it is not stored in a manner to generate pests. However, outlet sites may experience

routine or unplanned shutdowns due to maintenance or breakdown which may, in turn, lead to a build-up of wastes at the site. In this case, the company will identify alternative outlets, should this be required. If no alternative outlets can be identified, W L Polymer Ltd will liaise with their clients and customers to enable them to identify alternative sites to accept their wastes until normal operations at the site can resume following the resumption of operations at outlet sites.

6.4 PMP management

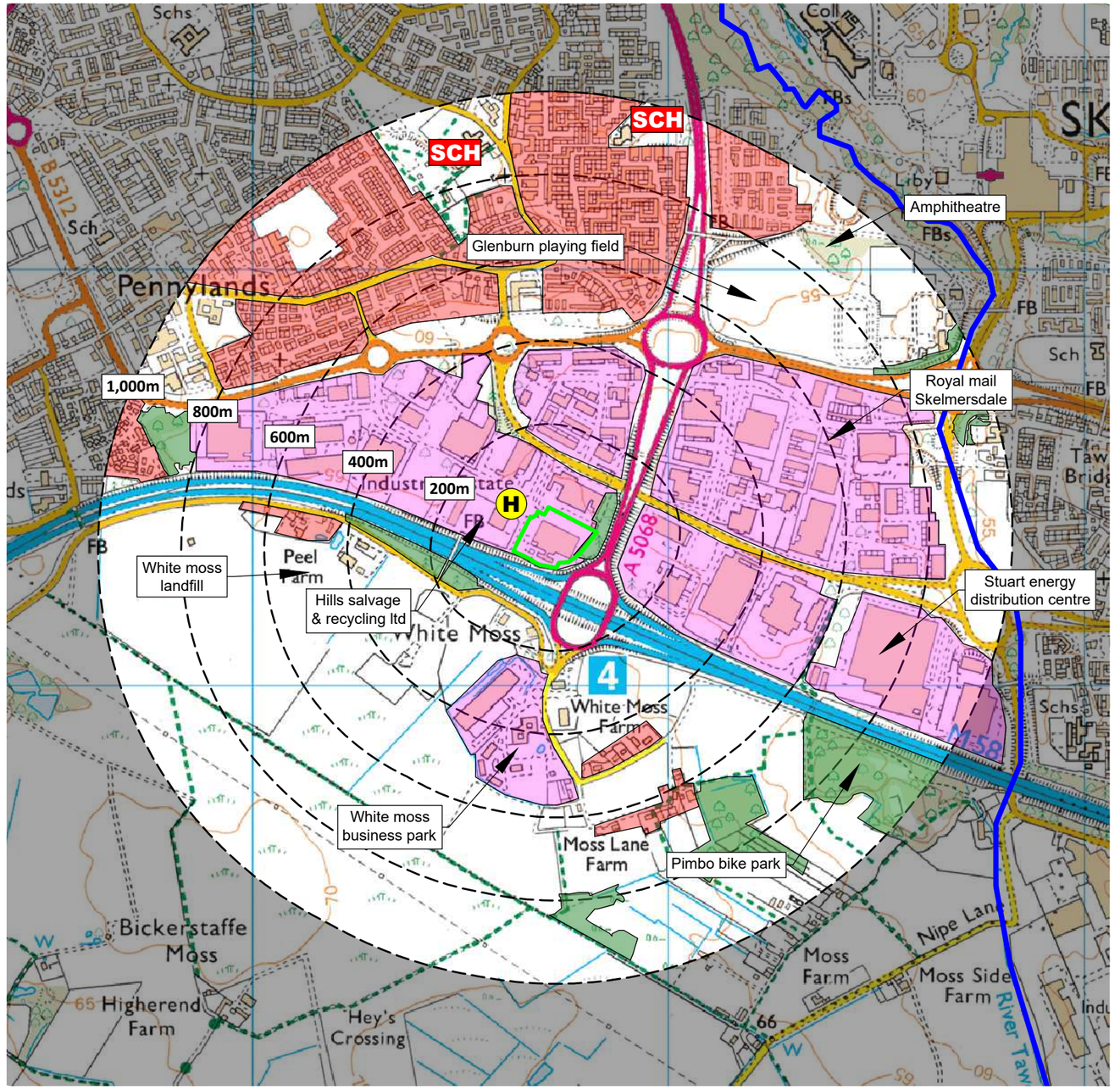
6.4.1 This PMP will be reviewed at least annually unless it becomes apparent that the activities are giving rise to pollution outside the site, in which case it will be revised within 7 days and a copy forwarded to the EA for approval before implementation.

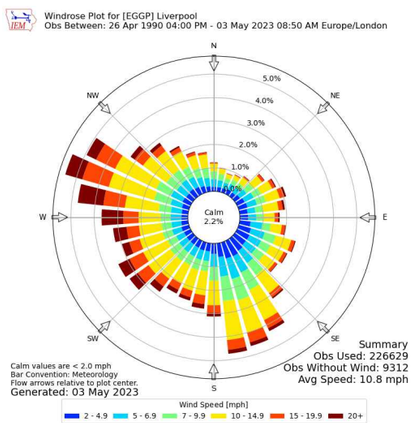
Appendix I

Drawings

KEY:

- Permit boundary
- Main River
- Surface water body (river / stream / pond / pool / lake)
- Workplaces (includes agriculture industry, commerce and retail)
- Areas with mix of residential, retail and commercial properties
- Residential blocks
- Class A, B, C roads
- Nearest fire hydrant
- Railway line
- School
- Woodland areas
- Priority habitat inventory (deciduous woodland)





Compass Wind Rose for (EGGP) Liverpool
Period 1990-2023
- source: Iowa State University

Scale Bar (1:12,500)

0 km — 500 m — 1 km

NOTES

1. Boundaries are shown indicatively.
2. Wind rose data shows the prevailing wind direction to be Southerly.

REVISION HISTORY

Rev:	Date:	Init:	Description:
-	28.09.23	JH	Initial drawing

Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants

DRAWING TITLE
RECEPTOR PLAN

CLIENT
WL Polymer Ltd

PROJECT/SITE
Gerrard Place, Skelmersdale WN8 9SF

SCALE @ A3	CLIENT NO	JOB NO
1:12,500	3329	001

DRAWING NUMBER	REV	STATUS
GPL/3329/04	-	Issued

DRAWN BY	CHECKED	DATE
JH	RS	28.09.23

Lime House, Road Two, Winsford, Cheshire, CW7 3QZ
t: 01606 558833 | e: sales@oaktree-environmental.co.uk

NOTES

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REVISION HISTORY

Rev:	Date:	Init:	Description:
-	17.11.23	CP	initial drawing
A	21.11.23	CP	Operator comments

Key:

- Permit boundary
- Combustible waste storage areas
- Temporary storage/loading areas
- Product storage non-waste
- Waste recycling buildings
- Concreted areas
- Other buildings (offices, etc.)
- Stone surface / free draining
- Landscaped/grass areas
- Location of fixed plant (indicative)
- Mains water point & hoses
- Spill kit
- Fire fighting equipment (extinguishers, etc.)
- Fire water containment equipment i.e. booms, drain mats, drain plugs etc..
- Access routes for emergency vehicles and site plant manoeuvring areas
- Fire alarm
- Surface water fall direction
- Foul water drainage (potentially contaminated)
- Surface water drainage (clean)
- Surface gullies
- Foul/surface manholes
- Plant / electrical shut off
- Fire assembly point
- Fire door
- CCTV cameras (indicative locations)
- Infrared/heat detection cameras (indicative locations)
- 0.8m wide concrete interlocking block fire wall
- 0.3m - 0.6m wide concrete panel fire wall
- Fire suppression system sprinklers (indicative locations)

EREMA Extrusion plant references

Ref:	Description:
1	Bag fill unit
2	Pellet drying centrifuge
3	Pellet transport system
4	Pellet dewatering system
5	Water pump station
6	Hot die face pelletiser
7	EREMA Backflush filter
8	Water system for vacuum pump
9	EREMA Laserfilter
10	Powered exhaust sytem
11	Control cabinet
12	INTAREME process combination
13	Belt conveyor
14	Maintenance platform

Wash Plant references

Ref:	Description:
1	Twin rotor shredder
2	Conveyor
3	Float sink tank
4	Centrifuge / dewater & clean
5	Granulator
6	Auger feed
7 & 8	Flat sink tanks
9	Centrifuge / dewater & clean
10	Float sink tank
11	Centrifuge / dewater & clean
12	Manifold & conveyors x 3
13	3 x screw press mechanical driers
14	Frames x 3 for holding jumbo sacks - Packing of finished agglomerate

Storage Area Details

Plan Ref	Description	Storage type	Containment / type	Height of firewall (m)	Max width (m)	Max length (m)	Max height (m)	Max area (m)	Conversion factor used	Approx. volume (m3) - out-of-hours	Max storage time	Comments
AREAS 1 - 4	Bays for unloading mixed waste streams for sorting and separation (waste may also contain as shown in AREAS 5-7)	Waste could be baled or loose	Concrete panel & concrete interlocking block fire walls	4	20	7	3	140	1	420	<8 weeks	Any wastes which could give rise to odour would be removed within 48 hours
AREAS 4 - 7	Bays for unloading mixed plastic prior to treatment (waste may also contain as shown in AREAS 1-4)	Waste could be baled or loose	As above	4	20	7	3	140	1	420	<8 weeks	Any wastes which could give rise to odour would be removed within 48 hours
AREA 8	Pre-processing bay containing plastic film prior to loading into the treatment plant	Waste could be baled or loose	As above	4	8	6	3	48	1	144	<24 hours	Area will continually load wastes into the pre-treatment area inside the building
AREA 9	Mixture of baled material and product storage	Baled / processed	Concrete panel fire wall of building	6	5	5	3	25	1	75	<8 weeks	These areas will only store waste in the event the baler is used because the wash & extrusion plants have been decommissioned
AREA 10	Mixture of baled material and product storage	Baled / processed	Concrete panel fire wall of building	6	5	8	3	40	1	120	<8 weeks	As above

Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants

DRAWING TITLE: SITE LAYOUT & PLAN

CLIENT: W L Polymer Ltd

PROJECT/SITE: Gerrard Place, Skelmersdale WN8 9SU

SCALE @ A0	CLIENT NO	JOB NO
1:200	3329	001
DRAWING NUMBER	REV	STATUS
GPL/3329/03	A	Issued
DRAWN BY	CHECKED	DATE
CP	SK	17.11.23

Lime House, Road Two, Winsford, Cheshire, CW7 3QZ
t: 01606 558833 | e: sales@oaktree-environmental.co.uk

Appendix II

Record Forms

W L POLYMER LTD
COMPLAINTS REPORT FORM (WLP/RF/7)

Date Recorded:	**Reference Number:**
Name and address of caller	
Telephone number of caller	
Time and Date of call	
Nature of complaint (noise, odour, dust, pest other) (date, time, duration)	
Weather at the time of complaint (rain, snow, fog, etc.)	
Wind (strength, direction)	
Any other complaints relating to this report	
Any other relevant information	
Potential reasons for complaint	
The operations being carried out on site at the time of the complaint	
Follow Up	
Actions taken	
Date of call back to complainant	
Summary of call back conversation	
Recommendations	
Change in procedures	
Changes to Environmental Management System (EMS)	
Date changes implemented	
Form completed by	
Signed	
Date completed	

COMPLAINT RECORDING PROCEDURE:

Any complaints received will be recorded on form WLP/RF/7. This form will normally be completed, signed and dated by the Site Manager; if they are not available the Office Manager will complete the form.

1) The name, address and telephone number of the caller will be requested.

2) Each complaint will be given a reference number.

3) The caller will be asked to give details of:

    a) the nature of the complaint;
    b) the time;
    c) how long it lasted;
    d) how often it occurs;
    e) Is this the first time the problem has been noticed; and
    f) what prompted them to complain.

4) The person completing the form will then, if possible, make a note of:

    a) the weather conditions at the time of the problem (rain, snow, fog etc.);
    b) strength and direction of the wind; and
    c) the activity or activities taken place on the site at the time the noise was detected, particularly anything unusual.

5) The reason for the complaint will be investigated and a note of the findings added to the report.

6) The caller will then be contacted with an explanation of the source of the complaint if identified and the action taken to prevent a recurrence of the problem in future.

7) If the caller is unhappy about the outcome or unwilling to identify themselves the caller will be invited to contact the EA and or the Local Authority.

Note: Following any complaint the relevant management plan(s) will be reviewed to ensure appropriate actions are in place to counter any problems.