File Reference: PLANCON/2013/0091
(please quote in all correspondence)

Case Officer: Neville Dobbs, Tel 01724 297489
Email: neville.dobbs@northlincs.gov.uk

NORTH LINCOLNSHIRE COUNCIL

www.northlincs.gov.uk

Peter Williams BSc, DMS, CEng, MEI, MCMI, AMIMechE
Director of Places
Civic Centre
Ashby Road
Scunthorpe
North Lincolnshire
DN16 1AB

24 July 2013

Mr S Render
Old Ferry Wharf Ltd
Ferry Road
Barrow Haven
Barrow upon Humber
DN19 7ET

Dear Mr Render

Construction of screen for storage of RDF – Old Ferry Wharf, Ferry Road, Barrow Haven

Many thanks for your cooperation on the occasion of my site visit last month and in showing me down the wharf to look at the screen. Thank you also for the emailed copy correspondence with regard to the storage use itself which effectively wraps up that question.

For my part I have spoken with our legal people. They go along with what Ron White and Andy Law told you and John Whittaker ie further planning permission is not required for the storage. Obviously the existing planning conditions re numbers of vessels visiting the wharf each year, hours of operations and maximum annual tonnages need to be observed.

On the question of the screen, Legal agree that no planning application is necessary for this either as the same effect would result from storing the RDF behind stacks of timber stored on the wharf. Put another way, there is nothing to stop you from choosing to store the concrete blocks in the way I saw them stacked when I visited, whether there is RDF behind them or not.

No further action will be taken in the matter.

Yours sincerely

NC Dobbs

Neville Dobbs
Senior Enforcement Officer

From: Andrew Law <Andrew.Law@northlincs.gov.uk>
To: john@whittaker.org.uk
Sent: Thursday, 21 March 2013, 13:10
Subject: old ferry wharf

Hi John,

As discussed this morning please find attached a copy of the relevant decision notice below along with a plan that shows the area where storage may take place and a copy of the conditions set out in the associated section 52 agreement. As discussed I have asked our legal department to search their archives to see if they have a full, signed copy of the section 52 agreement (and any amendments) and I will forward this on to you should they manage to find it.

Basically the planning permission allows the commercial storage of goods within the hatched area on the plan for the purposes of transshipment and there is no restriction on the types of goods that may be stored. The section 52 agreement further restricts the tonnage of goods that may be brought onto the site in any year (30,000 tonnes) and the number of barges that may use the wharf in any year (104); it also restricts the use of the landing to only one commercial vessel at a time and restricts the hours of loading/unloading to 6am - 7:30pm or sunset whichever is the later.

I trust that this has provided the necessary clarification; however should you require additional information do not hesitate to contact me.

regards

Andrew Law
Senior Planning Officer
North Lincolnshire Council
Development Control
Civic Centre
Ashby Road
Scunthorpe

THIS AGREEMENT is made the fifth day of June 1980

BETWEEN WM. FOSTER AND SONS (BARROW HAVEN) LIMITED whose registered office is situate at 1 West Haven Lane, Barrow Haven, Barrow on Humber (hereinafter called "the Developer") of the first part JAMIE VIDAL-GARCIA of The Haven Inn, Ferry Road, Barrow Haven, Barrow on Humber (hereinafter called "the Owner") of the second part and THE COUNTY COUNCIL OF HUMBERSIDE whose office is at Kingston House South, Bond Street, Kingston upon Hull (hereinafter called "the Council") of the third part

WHEREAS :

(1) The Council are the Local Planning Authority and the Highway Authority for the purposes of this Agreement

(2) The Developer has an interest in two parcels of land at Old Ferry Landing, north of Barrow Haven Station, Barrow Haven, Barrow-upon-Humber in the Borough of Glanford one such parcel of land is shown coloured pink (including pink hatched black) on the attached plan (this parcel is hereinafter referred to as "the property") and the other parcel of land is shown coloured blue hatched black on the said plan

(3) The Owner is seised in fee simple of land forming part of the premises known as The Haven Inn, Ferry Road, Barrow Haven, Barrow-upon-Humber in the Borough of Glanford which land is shown coloured green hatched black on the said plan (this land is hereinafter referred to as "the said land")

(4) On the eighth day of December 1977 planning permission (Code No. 7/402/77) was granted to the Developer to replace a derelict wooden jetty forming part of the property with a concrete jetty ("the said development") on condition (inter alia) that the jetty (hereinafter referred to as "the said jetty") be used in connection with leisure and recreational pursuits

(5) Subsequent to the above permission the Developer indicated that in order to carry out the said development it would be necessary to secure financial support which would only be available if limited commercial activity were permitted at the said jetty

(6) The use of the said jetty for commercial activity would be contrary to planning policies which envisage Barrow Haven as providing for leisure and recreational facilities but having regard to the covenants contained in this Agreement and the

(v) To keep records of the dates and times of arrivals and departures of all commercial vessels mooring with the consent of the Developer at the said jetty and of the weight of cargo loaded or discharged into or out of all such vessels and to make such records available for inspection by the Council's representatives at all reasonable times on giving at least 24 hours' notice

(vi) Prior to the said jetty being brought into use for commercial purposes to provide a vehicular turning space and loading/unloading area at the property to the satisfaction of the Highway Authority

(vii) To use their best endeavours to encourage the use of the said jetty in connection with leisure and recreational pursuits and to space the use of the said jetty by commercial vessels as evenly as possible throughout each year

(viii) To construct as the Council's agent but at its own expense a layby on each of the three parcels of land shown coloured blue (including blue hatched black) yellow and green (including green hatched black) respectively on the said plan together with associated works to the specification set out in the Schedule to this Agreement all such works to be completed in all respects to the satisfaction of the Highway Authority prior to the said jetty being brought into use for commercial purposes

(ix) Not to store or allow the storage of materials or finished goods at the property except insofar as is necessary for trans-shipment in which case storage shall be confined to the area shown coloured pink hatched black on the said plan but in the event of the highway adjacent to the property being permanently closed to vehicular traffic storage may in addition take place on the area coloured pink edged red on the said plan

desirability of the said development from a leisure and recreational point of view and following application by the Developer the Council have by Notice of Decision of even date herewith relating to Planning Application Code No. 7/319/78 granted permission for the said development for commercial purposes

(7) For the purpose of regulating the said development and use of the property the Developer has agreed to enter into this Agreement and for the purpose only of dedicating the said land the Owner has agreed to join in

NOW THIS DEED WITNESSETH:

1. THIS Agreement is made in pursuance of Section 52 of the Town and Country Planning Act 1971 Section 126 Housing Act 1974 and Section 111 Local Government Act 1972

2. THE Developer hereby covenants with the Council as follows:

(i) The property and the said jetty shall be permanently subject to the restrictions and provisions regulating the development and use thereof specified in this Agreement unless varied by a supplemental document under seal entered into by mutual agreement between the Developer and the Council and registered as a local land charge;

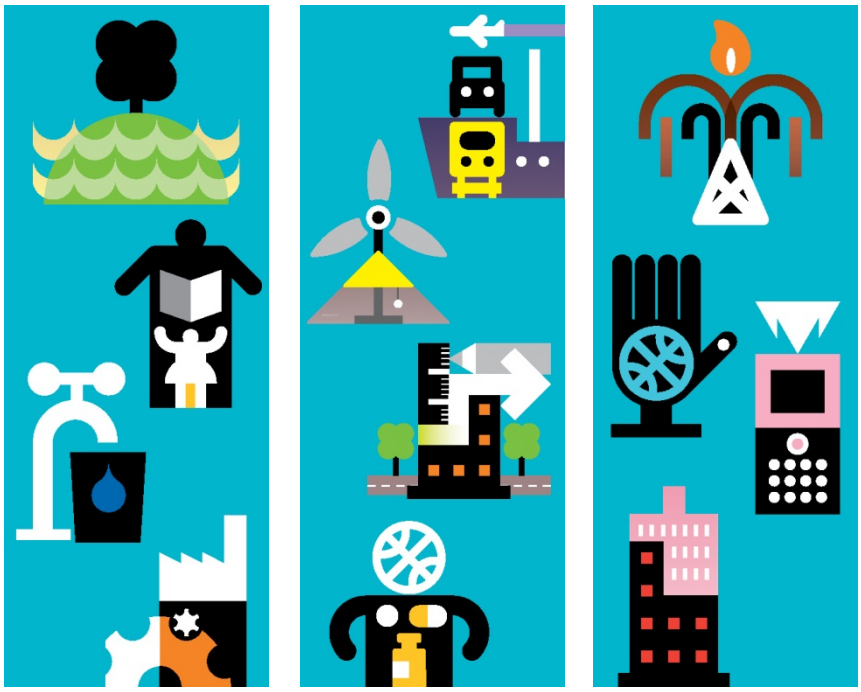
(ii) Not to use or permit the use of the said jetty

(a) for loading or discharging cargo in excess of a total of 30,000 tonnes in any year, and

(b) by more than 104 commercial vessels in any year any such year to be calculated from the date of the first use of the said jetty by a commercial vessel and subsequently from the anniversary of that date

(iii) Not to moor or permit the mooring of (a) more than one commercial vessel at any one time at the said jetty or (b) any commercial vessel alongside any other vessel moored at the said jetty

(iv) Not to load unload or move or permit the loading unloading or movement of any cargo from onto or on the property other than between the hours of 6 a.m. to 7.30 p.m. or sunset whichever is the later



Environmental Permit for Old Ferry Wharf Waste Transfer

Site Plans - EES/336366/B2/01

April 2014

Neales Waste Management Ltd

Mott MacDonald

Environmental Permit for Old Ferry Wharf Waste Transfer

Site Plans - EES/336366/B2/01

April 2014

Neales Waste Management Ltd

Aspinall House, Walker Office Park, Walker Road, Guide, Blackburn, BB1 2JZ

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Issue and revision record

Revision	Date	Originator	Checker	Approver	Description	Standard
A	23/04/2014	Nickola Brown	Anita Manns	David Dray	Final	

Contents

1 Introduction

This document has been prepared by Mott Macdonald Ltd on behalf of Old Ferry Wharf Ltd to accompany and support the application for an Environmental Permit covering the in-transit storage of solid recovered fuel (SRF) at Old Ferry Wharf, Ferry, Road, Barrow Haven, North Lincolnshire DN19 7ET. The application is being made under the Environmental Permitting Regulations 2010, as amended.

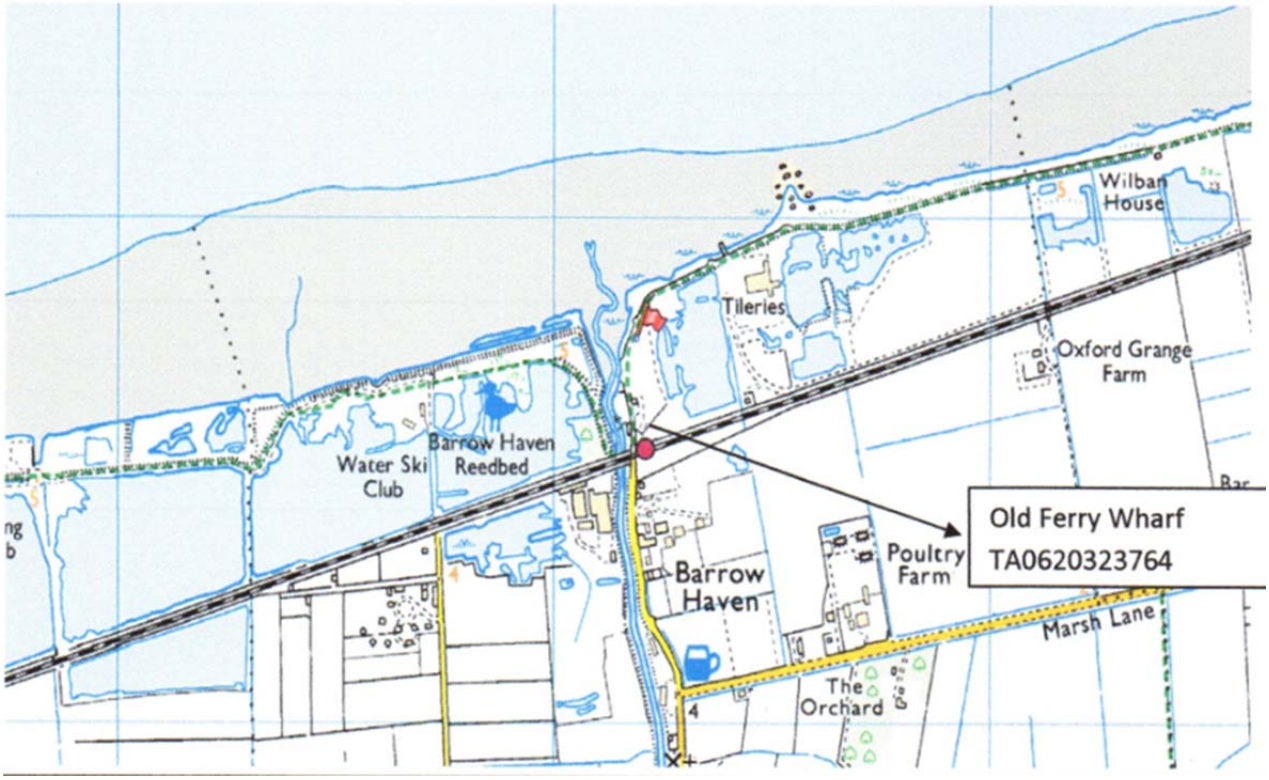
Appendices

Appendix A. Site Location Plans

Map A.1: Site Location Plan

Source: Old Ferry Wharf Ltd, April 2014

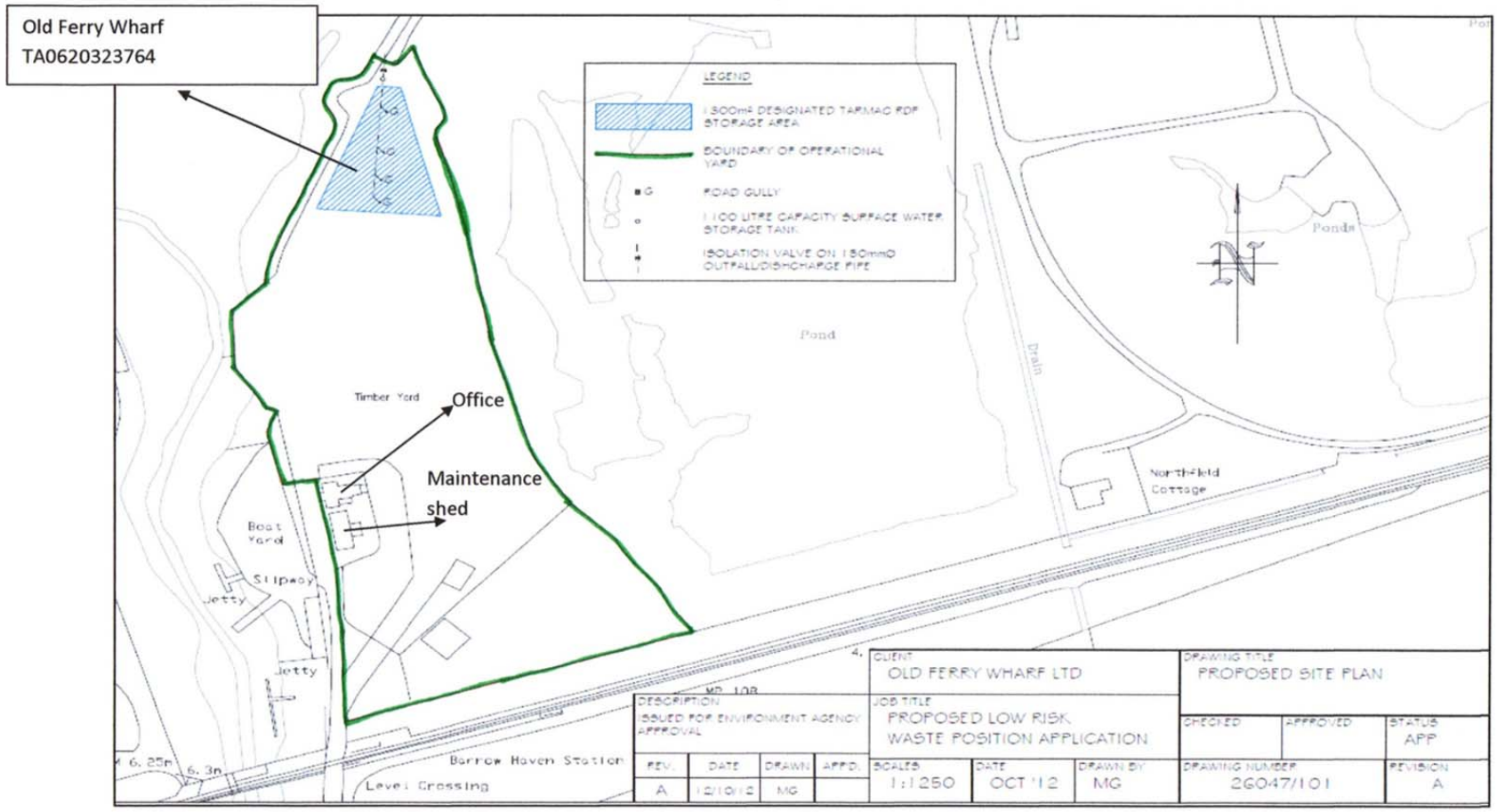
Map A.2: Site Location



Source: Old Ferry Wharf Ltd, April 2014

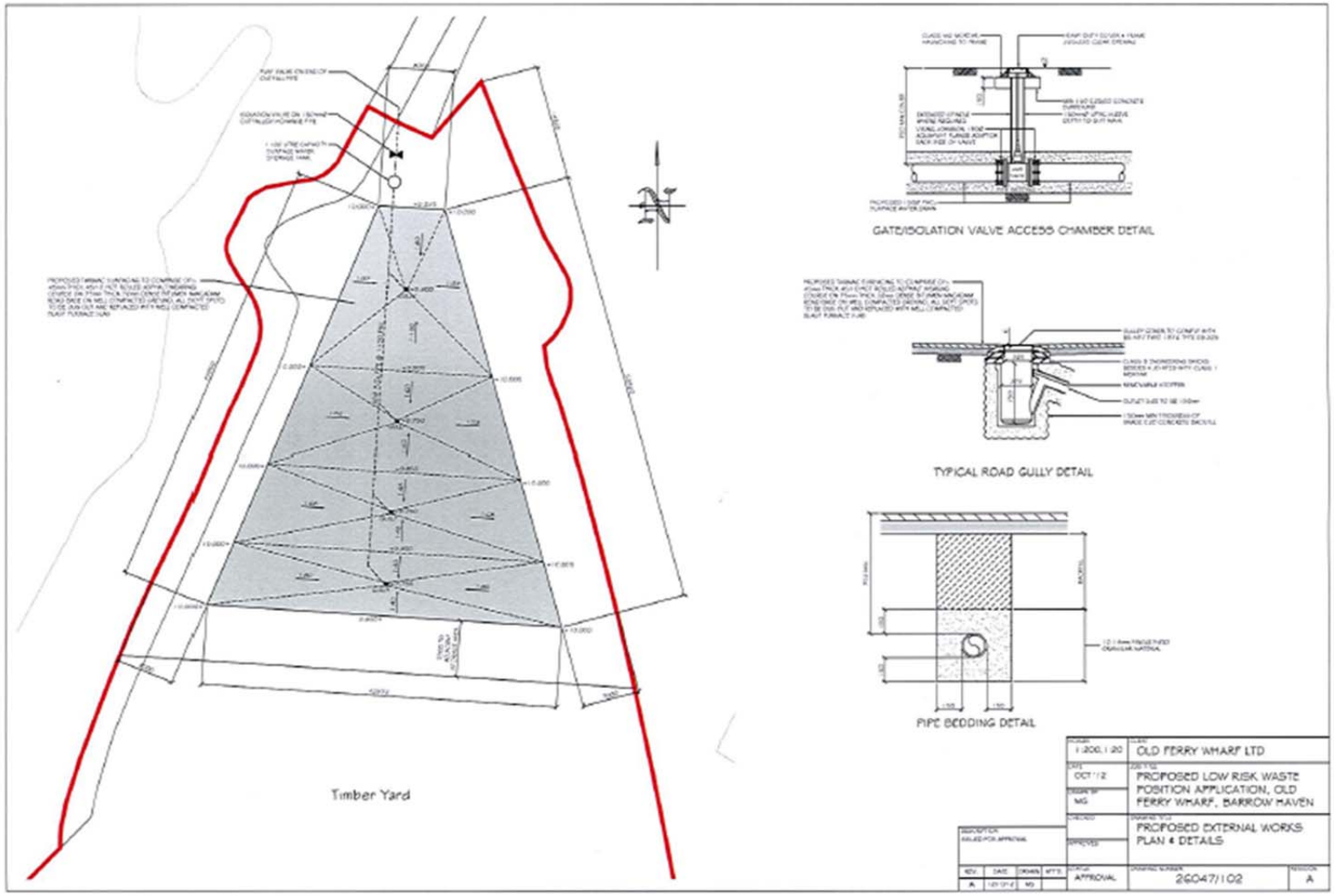
Appendix B. Site Layout Plans

Map B.1: Site Layout Plan with Green Line

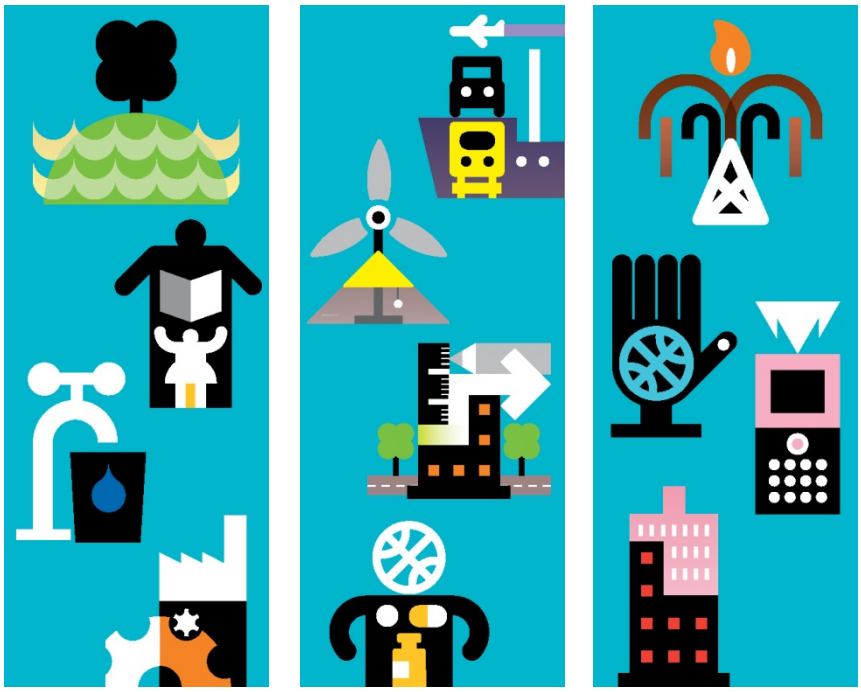


Source: Old Ferry Wharf Ltd, April 2014

Map B.2: Site Layout Plan showing SRF Storage Area



Source: Old Ferry Wharf Ltd, April 2014



Environmental Permit for Old Ferry Wharf

Site Condition Report - EES/336366/B2/02

April 2014

Neales Waste Management

Environmental Permit for Old Ferry Wharf

Site Condition Report - EES/336366/B2/02

April 2014

Neales Waste Management

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Issue and revision record

Revision	Date	Originator	Checker	Approver	Description	Standard
A	08/04/2014	M Rickard	L Bethell	J Dottridge	First Issue	
B	23/04/14	M Rickard	L Bethell	D Dray	Final	

Contents

Figures

Tables

Executive Summary

This document supports the Environmental Permit Application prepared by Mott MacDonald on behalf of Neales Waste Management Ltd for a transit storage facility Old Ferry Wharf, Ferry Road, Barrow Haven, North Lincolnshire, owned and operated by Old Ferry Wharf Ltd. The application is being made under the Environmental Permitting Regulations, 2010 (as amended) by Old Ferry Wharf Ltd. This application applies to the site infrastructure as part of the transit storage facility.

The Old Ferry Wharf site is currently used for timber storage, including some treated timber. It is understood that there is no on-site timber treatment. The proposed use, on a specially engineered area of the site, is for the storage of Solid Recovered Fuel (SRF) prior to exporting. The SRF arrives at site already baled. No processing of materials occurs on site.

Old Ferry Wharf originally operated under Low Risk Waste Position LRW431 receiving Refuse Derived Fuel (RDF) for export from October 2012 to October 2013. However, this was later replaced with Regulatory Position Statement (RPS) 128 – Short term storage of RDF at a dockside. Those sites that cannot meet the terms of the RPS were allowed until 31/10/13 to either cease operations or apply for an Environmental Permit. As the site is within 500m of a SSSI, Ramsar site or European site, then an Environmental Permit is required. The permit will cover the storage of Solid Recovered Fuel (SRF) prior to export only. No other waste management activity will take place under this permit. This document does not identify any permitted or non-permitted activities that the site may decide to undertake in the future.

The drainage system consists of an Ecosure 1100ltr Underground Water Tank which will be closed-off during site operation. There is an impermeable surface in the main storage area and concrete push walls extend around the site. The rest of the site is a mix of hardstanding and concrete. However, there is a mobile bunded tank for red diesel to fuel the fork lift truck which is stored in the maintenance shed.

The site is located on land adjacent to the confluence of The Beck and the River Humber, north of the village of Barrow Haven. Adjacent to the site on the bank of

The Beck to the west is a small boatyard. The site is bounded on all sides by land with Ramsar, SPA and SSSI designations.

The site is underlain by a Tidal Flat Deposits and the White Chalk Subgroup. The Tidal Flat Deposits are classified as Unproductive strata and the Chalk as a Principal Bedrock Aquifer. The superficial deposits are likely to act as a protective barrier to vertical migration of contamination into the underlying Chalk. Therefore the hydrogeology of the site is considered to be of low sensitivity.

The site is bounded on all sides by land with Ramsar, SPA and SSSI designations. The River Humber and The Beck are also included in these designations. These are considered as sensitive ecological and surface water receptors.

During its operation under the LWR Position, the site was operated without any reported pollution incidents or releases to ground.

The site has been in the Foster family for over 100 years and was previously worked as a brick and tile yard up until 1968. The clay was excavated from the site to be used in brick manufacturing. After this time the site was infilled, until the mid-1970s, with highway construction and excavation waste, which potentially included coal tar and contaminated materials. In the early 1980s a dock was built at the site to enable the removal of goods from the site by water.

Based on the previous use of the site as a brick works since the 1880s and infilled clay pit, the possibility of previous land contamination cannot be ruled out. As there is a lack of available data from previous ground investigations it is not possible to confirm the level of contamination or the potential impact that it may have had on soil or groundwater quality. Therefore the possibility of contamination during previous activities must be considered likely.

It was recommended to Old Ferry Wharf Ltd to undertake ground investigations as they could be liable for any remediation of the site upon surrender of the permit, but they declined as they considered it unnecessary. The SRF stirage area is laid with an impermeable surface and sealed drainage and only dry material is being

stored. The site has been in the same family ownership for over 100 years and any contamination is considered historical. However, under the Environmental Permitting Regulations 2012 as amended, any remediation required in order to surrender the permit is the responsibility of the operator and this will need to be taken into consideration.

1 Introduction

1.1 Background

Old Ferry Wharf Ltd intends to apply for an Environmental Permit to allow the in-transit storage of waste based secondary fuels at Old Ferry Wharf, Ferry Road, Barrow Haven, North Lincolnshire, DN19 7ET. The site is owned by Wm. Foster & Sons (Barrow Haven) Ltd and operated by a subsidiary, Old Ferry Wharf Ltd.

A permit is required to allow up to 5,000 tonnes of material to be stored at the facility, at any one time. All secondary fuel entering site under a 19:12:10 or 19:12:12 code will arrive baled in line with the European Transfrontier Shipment of Waste (TFS) Regulations.

Mott MacDonald has been commissioned to produce an Application Site Condition Report (SCR) in support of Old Ferry Wharf Ltd's Environmental Permit application for the site.

1.2 Site Condition Report

A SCR is required for any new or existing facility regulated under the Environmental Permitting Regulations, where there may be a significant risk to land or groundwater.

Under the Environment Agency guidance a SCR should describe and record the condition of the land and groundwater at a site. An effective SCR would then allow Old Ferry Wharf Ltd to demonstrate that land and groundwater has been protected during the lifetime of the operations at the site and is in a satisfactory condition when the permit is eventually surrendered.

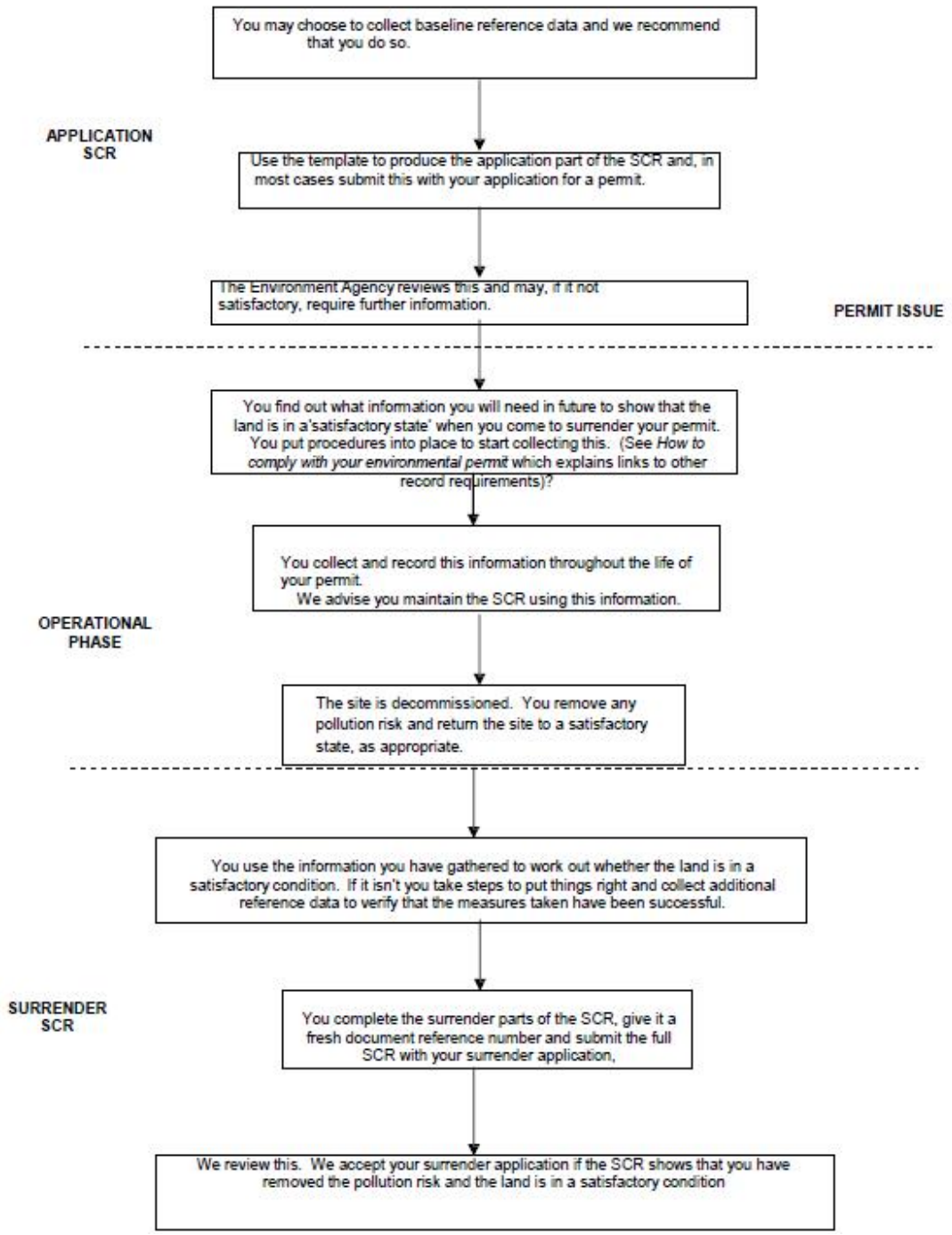
The development of an SCR requires:

1. Production of the application part of the SCR when first applying for an Environmental Permit;
2. Updating the SCR during the lifetime of the Permit; and
3. Completing the surrender parts and submitting the full completed SCR when Old Ferry Wharf Ltd surrenders the Environmental Permit describing the condition of land and groundwater at the time of surrender.

Figure 1.1 shows the stages in the SCR Process as outlined in the document "Environmental Permitting Regulations, Guidance for Applicants H5, Site Condition Report – guidance and templates", EA, April 2013.

At this initial stage, only the "Application SCR" sections are required to be completed for permit issue. The "Operational Phase" sections will need to be completed during the operation of the facility until permitted activities cease, at which point the "Surrender SCR" sections should be fulfilled for the revocation notice to be issued.

Figure 1.1: SCR Process



Source: Environmental Permitting Regulations, Guidance for Applicants H5, Site Condition Report – guidance and templates", EA, 2013

2 Site Condition Report

2.1 SCR Application

2.1.1 SCR Application section 1-3

Sections 1-3 of the SCR application have been completed as part of this report and will be submitted with the application.

1.0 SITE DETAILS	
Name of the applicant	Old Ferry Wharf Ltd
Activity address	Old Ferry Wharf Ferry Road Barrow Haven North Lincolnshire DN19 7ET
National grid reference (NGR)	TA 06196 23765

Document reference and dates for Site Condition Report at permit application and surrender	
At permit application:	EES/336366/B2/02
At surrender:	To be confirmed

Document references for site plans (including location and boundaries)	
Site plans references	EES/329137/B2/01

2.0 Condition of the land at permit issue	
Environmental setting including: geology hydrogeology surface waters	See section 3 of this report
Pollution history including: pollution incidents that may have affected land historical land-uses and associated contaminants any visual/olfactory evidence of existing contamination evidence of damage to pollution prevention measures	See section 4 of this report
Evidence of historic contamination, for example, historical site investigation, assessment, remediation and verification reports (where available)	None available
Baseline soil and groundwater reference data	No data found
Supporting information	Envirocheck Report - Source information identifying environmental setting and pollution incidents Historical Ordnance Survey plans Site reconnaissance

2.0 Condition of the land at permit issue

3.0 Permitted activities	
Permitted activities	See section 3 of this report
Non-permitted activities undertaken	See section 3 of this report
Document references for: plan showing activity layout; and environmental risk assessment.	See separate document reference EES/336366/B2/01 for all related drawings See separate document for the Environmental Risk Assessment EES/336366/B2/04

2.1.2 SCR Application sections 4-7

During the life of the permit sections 4-7 of the SCR Application are to be maintained.

4.0 Changes to the activity	
Have there been any changes to the activity boundary?	If yes, provide a plan showing the changes to the activity boundary.
Have there been any changes to the permitted activities?	If yes, provide a description of the changes to the permitted activities
Have any 'dangerous substances' not identified in the Application Site Condition Report been used or produced as a result of the permitted activities?	If yes, list of them
Checklist of supporting information	Plan showing any changes to the boundary (where relevant) Description of the changes to the permitted activities (where relevant) List of 'dangerous substances' used/produced by the permitted activities that were not identified in the Application Site Condition Report (where relevant)

5.0 Measures taken to protect land	
Use records that you collected during the life of the permit to summarise whether pollution prevention measures worked. If you can't, you need to collect land and/or groundwater data to assess whether the land has deteriorated.	
Checklist of supporting information	Inspection records and summary of findings of inspections for all pollution prevention measures Records of maintenance, repair and replacement of pollution prevention measures

6.0 Pollution incidents that may have had an impact on land, and their remediation	
Summarise any pollution incidents that may have damaged the land. Describe how you investigated and remedied each one. If you can't, you need to collect land and /or groundwater reference data to assess whether the land has deteriorated while you've been there.	
Checklist of supporting information	Records of pollution incidents that may have impacted on land Records of their investigation and remediation

7.0 Soil gas and water quality monitoring (where undertaken)	
Provide details of any soil gas and/or water monitoring you did. Include a summary of the findings. Say whether it shows that the land deteriorated as a result of the permitted activities. If it did, outline how you investigated and remedied this.	
Checklist of supporting information	Description of soil gas and/or water monitoring undertaken Monitoring results (including graphs)

2.1.3 SCR Application sections 8-10

At surrender sections 8-10 of the SCR Application are to be completed and submitted with the surrender application.

8.0 Decommissioning and removal of pollution risk	
Describe how the site was decommissioned. Demonstrate that all sources of pollution risk have been removed. Describe whether the decommissioning had any impact on the land. Outline how you investigated and remedied this.	
Checklist of supporting information	Site closure plan List of potential sources of pollution risk Investigation and remediation reports (where relevant)

9.0 Reference data and remediation (where relevant)	
Say whether you had to collect land and/or groundwater data. Or say that you didn't need to because the information from sections 3, 4, 5 and 6 of the Surrender Site Condition Report shows that the land has not deteriorated. If you did collect land and/or groundwater reference data, summarise what this entailed, and what your data found. Say whether the data shows that the condition of the land has deteriorated, or whether the land at the site is in a "satisfactory state". If it isn't, summarise what you did to remedy this. Confirm that the land is now in a "satisfactory state" at surrender.	
Checklist of supporting information	Land and/or groundwater data collected at application (if collected) Land and/or groundwater data collected at surrender (where needed) Assessment of satisfactory state Remediation and verification reports (where undertaken)

10.0 Statement of site condition
Using the information from sections 3 to 7, give a statement about the condition of the land at the site. This should confirm that: the permitted activities have stopped; decommissioning is complete; and the pollution risk has been removed the land is in a satisfactory condition.

3 Environmental setting

3.1 Introduction

The following sections detail the sources of desk study information used to describe the conditions of the development area and, in particular, to determine the potential for substances to be present in, on or under the land associated with present and past uses of the site and its surrounding area. The following sources of information were consulted during this report:

- Ordnance Survey Map (2010)[i]
- BGS Geology of Britain Viewer (2014)[ii]
- IGS Hydrogeology Map (1967)[iii]
- Environment Agency website (2014) [iv]
- Envirocheck Report (2014)[v].

Environmental setting includes:

- Geology;
- Hydrogeology; and,
- Surface waters.

3.2 The Site

3.2.1 Site Use

Old Ferry Wharf Ltd currently handles bulk commodities in bags, in a baled form or on pallets. These commodities can include steel sections and coils, bricks, tiles, timber and finished goods both for import and export trades. In addition to these commodities, the wharf and its 1ha storage yard are used for forwarding and distributing Baltic timber products. The movement of these commodities does not need to be subject to the Environmental Permitting Regulations 2010 (as amended), as these materials are not wastes.

The Old Ferry Wharf site is currently used for timber storage, including some treated timber. It is understood that there is no on-site timber treatment. The proposed use, on a specially engineered area of the site, is for the storage of Solid Recovered Fuel (SRF) prior to exporting. No processing activities occur on site.

Old Ferry Wharf operated under Low Risk Waste Position LRW431 receiving Refuse Derived Fuel (RDF) for export from October 2012 to October 2013. This LRW431allowed for:

- The storage prior to export or after import of up to 10,000 tonnes at any one time of RDF at a dockside in wrapped bales to prevent water ingress, or in a secure container or building for the purposes of recovery. The RDF should be stored for no longer than 3 months.

However, this was later replaced with the Regulatory Position Statement (RPS) 128 – Short term shortage of RDF at a dockside. Those sites that cannot meet the terms of the RPS were allowed until 31/10/13 to either cease operations or apply for an environmental permit. As the site is within 500m of a SSSI, Ramsar site or European site then an Environmental Permit is required. The permit will cover the storage of SRF prior to export only; no other waste management activity will take place under this permit. This

document does not identify any permitted or non-permitted activities that the site may decide to undertake in the future.

During its operation under the LWR Position, the site was operated without any reported pollution incidents or releases to ground.

SRF will be delivered to site in bales weighing approximately 750kg on an intermittent basis. Each bale will be cross-wrapped 6-7 times. The number of times that each bale is wrapped corresponds to the number of times that it is handled. The wrapping will consist of 35µm plastic film, which is UV stable and designed to accommodate the seasonal conditions. The waste will be baled to 1.1m x 1.2m x 0.75m in size using a power baler and held together using nylon strapping prior to being wrapped. All baling is undertaken at a site operated by Neales Waste Management Ltd at Clayton Hall, Blackburn, which is where the SRF will be derived. No processing occurs on site; the site is used for storage only, prior to exporting. Potential risks of contamination of groundwater and land from the proposed processes are considered negligible.

The drainage system consists of an Ecosure 1100ltr Underground Water Tank which will be closed off during site operation. There is an impermeable surface in the main storage area (see plans in document EES/336366/B2/01) and concrete push walls extend around the site. There is a lockable gate and the site will be kept locked when the site is closed to prevent unauthorised access. The rest of the site is a mix of hardstanding and concrete. There were no external tanks or pipework observed during the site visit on 6th March 2014. However, there is a mobile bunded tank for red diesel to fuel the fork lift truck which is stored in the maintenance shed. Pollution prevention measures are described further in the Management Plans, document reference EES/336366/B4/01.

3.2.2 Site description

Old Ferry Wharf is located on land adjacent to the confluence of The Beck and the River Humber, north of the village of Barrow Haven (shown in Figure 3.1) at NGR TA 06196 23765. The area of the site is approximately 2ha.The northern part of the site is an impermeable concrete storage area. The southern part is a combination of a number of buildings, some of which are surrounded by a small wooded area, and further hardstanding. A car park is located at the south west corner of the site and adjacent to this, to the east, is a small area of grassland. The site has a public right of way and footpath running through it, which must be kept clear and accessible at all times. The footpath runs from the entrance of the site to the south, between the SRF storage compound and the jetty and up to the north of the site. Adjacent to the site on the bank of The Beck to the west is a small boatyard. The topography of the site is generally level at approximately 4mAOD.

Figure 3.1: Site location plan

Source: Mott MacDonald (Dec 2013)

3.3 Geology

The BGS website (2014) was reviewed to determine the geological conditions at the site. Both the 1:50,000 Geological Map and the BGS Borehole Log search were utilised. Several BGS logs located within and adjacent to the site have been identified. The closest borehole is located in the south east of the site (reference TA02SE126) although no date of construction is available.

The 1:50,000 geological mapping and local borehole logs are logged slightly differently/ use different nomenclature for the superficial deposits in the area of the site, but this is not considered to be significant. Based on the above information the expected geological sequence is summarised in Table 3.1.

Table 3.1: Anticipated geology

Geological Unit	Description	Age	Approximate thickness
Superficial Deposits			
Tidal Flat Depostis[2] (also referred to as Warp[1])	Consolidated soft silty clay, with layers of sand, gravel and peat. (previously logged as artificially induced alluvium)	Quaternary	27m
Bedrock			
Welton Chalk Formation	White, massive or thickly bedded chalk with common flint nodules but generally lacking tabular flint bands.	Cretaceous	25m+

[1]BGS Borehole Log TA02SE126
[2]1:50,000 BGS Geology Map

3.4 Hydrogeology and hydrology

3.4.1 Groundwater

The IGS Hydrogeology Map (1967) indicates that local groundwater flow in the Chalk aquifer is north towards the River Humber.

3.4.1.1 Source Protection Zones

The Environment Agency (EA) has allocated groundwater Source Protection Zones (SPZ) around major groundwater abstraction points. The zones restrict the type of activities and development permitted within their boundaries to protect groundwater reserves.

The EA website (2014) indicates that the site is located outside of designated groundwater SPZs in the region.

3.4.1.2 Groundwater Vulnerability

Based on the Water Framework Directive, the EA has classified three groundwater resource types (aquifers) as Principal Aquifers, Secondary Aquifers and Unproductive Strata based upon their capacity to supply drinking water and support ecosystems. Principal Aquifers are considered to have the greatest capacity and unproductive strata the least.

Data from the EA website (2014) indicates that the Tidal Flat Deposits are classified as Unproductive Strata, whilst the underlying Chalk is classified as a Principal Bedrock Aquifer.

The local flow of groundwater in the Chalk is to the north, away from any groundwater abstractions, and the cover of Tidal Flat Deposits on the site is relatively thick (27m). The Tidal Flat Deposits are likely to be of low permeability due to their clay content. The superficial deposits are likely to act as a protective barrier to vertical migration of contamination into the underlying Chalk. Therefore the hydrogeology of the site is considered to be of low sensitivity.

3.5 Surface water and flood risk

3.5.1 Surface water

The site is bounded by The Beck watercourse to the west and the River Humber to the north. A large wetland/marsh area is located along the eastern boundary of the site and similar areas are located on the opposite bank of The Beck to the west.

3.5.2 Flood risk

The eastern half of the site has been shown to be within the 1 in 100 year flood zone for flooding from the River Humber, based upon data from the EA website (2014).

3.6 Ecological sites

The site is bounded on all sides by land with Ramsar, SPA and SSSI designations as detailed in the Envirocheck Report (2014).

4 Condition of land at permit issue

4.1 Pollution History

Pollution history includes:

- Pollution incidents that may have affected land;
- Historical land-uses and associated contaminants;
- Any visual/olfactory evidence of existing contamination; and,
- Evidence of damage to pollution prevention measures.

4.2 Ground Conditions/Contaminated Land

It is not possible to confirm the ground conditions and/or levels of contamination as previous ground investigation data was not available at the time of writing. Therefore, due to this lack of information, often identified in contaminated land reports or geotechnical assessments, it is not possible to provide site specific information (and set baseline reference data) on the contamination status of soils or groundwater in the development plot area.

The location of the site is considered to be on brownfield land, with a long history of use for industrial activities, and historic maps provide some evidence of potentially polluting activities on the site prior to its current use. The site has been in the Foster family for over 100 years and was previously worked as a brick and tile yard up until 1968. The clay was excavated from the site to be used in the manufacturing process. Afterwards the site was in-filled, until the mid-1970s, with highway construction and excavation waste, which could potentially include tar and contaminated materials. In the early 1980s a dock was built at the site to enable the removal of goods from the site by water. In 1986, Old Ferry Wharf Ltd was set up and the site has operated for in-transit storage since.

The Old Ferry Wharf site is currently used for timber storage, included some treated timber. It is understood that there is no on-site treatment of timber. The proposed use, on a specially engineered area of the site, is for the storage of SRF prior to exporting. No processing or activities relating to waste management occurs on site.

Old Ferry Wharf operated under Low Risk Waste Position LRW431 receiving RDF for export from October 2012 to October 2013. Old Ferry Wharf Ltd has been consulted on whether, during their operation of the site, any spills, pollution incidents or releases to ground have occurred and they have stated that no spills or pollution incidents have occurred.

4.3 Pollution Incidents that may have affected land

According to the Envirocheck Report (2014) there are no records of any pollution incidents at the site. There are also no known or reported historical pollution incidents on this site.

There is only one pollution incident to controlled water reported within 1000m of the site in the Envirocheck Report (2014). However, the incident is recorded as discharge of unknown chemicals to the estuary and is classified as a minor incident (382m from site).

4.4 Historical land uses and associated contaminants

A review of the historical Ordnance Survey 1:10,000 and 1:2,500 maps included in the Envirocheck Report (2014) has been undertaken to provide an outline of the site history.

Maps dating 1886-1932, 1968-1971 and 1988-2013, shows respectively:

- the site as a brick works;
- the site as a brick works and clay pit;
- the site as a timber yard.

This is in general agreement with the reported use of the site, presented in Section 4.3, above.

The Enivrocheck Report (2014) has details of four historical landfill sites and three registered landfill sites within 1km of the site. None of these sites are reported as currently active.

Although no obvious signs of contamination were apparent during the site visit undertaken in March 2014, the possibility of land contamination from previous land uses and activities cannot be ruled out.

As this area is considered a brownfield site with evidence of a brick works on the site since at least 1886 and an infilled pit, it is not possible to confirm what potentially contaminative activities have been undertaken or their impact on soil or groundwater quality.

No information on soil and groundwater quality (reference data) to describe the site at the start of the new permit is available and it is not presently proposed to collect such information. A review of BGS Geoindex undertaken in March 2014 identified that there are no site investigation reports available for the site.

4.5 Any visual/olfactory evidence of existing contamination

During the site walkover on 6 March 2014, no visual or olfactory evidence of existing contamination was observed to be present at this site.

5 Conclusions

This document supports the Environmental Permit Application prepared by Mott MacDonald on behalf of Old Ferry Wharf Ltd for new activities to be conducted at Old Ferry Wharf, Ferry Lane, Barrow Haven, North Lincolnshire. The application is being made under the Environmental Permitting Regulations 2010 (as amended). The permit applies to the transit storage facility operations.

There is currently no site specific information from ground investigation works to confirm the contamination status of soils and groundwater to set pre-permit baseline reference conditions.

The site is underlain by Tidal Flat Deposits and the White Chalk Subgroup. The Tidal Flat Deposits are classified as Unproductive strata and the Chalk as a Principal Bedrock Aquifer. The local flow of groundwater in the Chalk is to the north, in the opposite direction to any groundwater abstractions. As the cover of Tidal Flat Deposits on the site is relatively thick and as these are likely to be of low permeability, the superficial deposits are likely to act as a protective barrier to vertical migration of contamination into the underlying Chalk. Therefore the hydrogeology of the site is considered to be of low sensitivity.

The site is located on the banks of the Humber Estuary and The Beck, is within the 1 in 100 Flood Zone and is therefore prone to surface water flooding. The site is bounded on all sides by land with Ramsar, SPA and SSSI designations. The River Humber and The Beck are also included in these designations. These are considered as sensitive ecological and surface water receptors and must be protected against contamination.

Old Ferry Wharf originally operated under Low Risk Waste Position LRW431 receiving RDF for export from October 2012 to October 2013. This LRW431 allowed for:

- The storage prior to export or after import of up to 10,000 tonnes at any one time of Refuse Derived Fuel (RDF) at a dockside in wrapped bales to prevent water ingress, or in a secure container or building for the purposes of recovery. The RDF should be stored for no longer than 3 months.

However, this was later replaced with the Regulatory Position Statement (RPS) 128 – Short term shortage of RDF at a dockside. Those sites that cannot meet the terms of the RPS had until 31/10/13 to either cease operations or apply for an environmental permit. As the site is within 500m of a SSSI, Ramsar site or European site then an Environmental Permit is required. The permit will cover the storage of SRF prior to export only, no other waste management activity will take place under this permit. This document does not identify any permitted or non-permitted activities that the site may decide to undertake in the future.

During its operation under the LWR Position the site was operated without any reported pollution incidents or releases to ground.

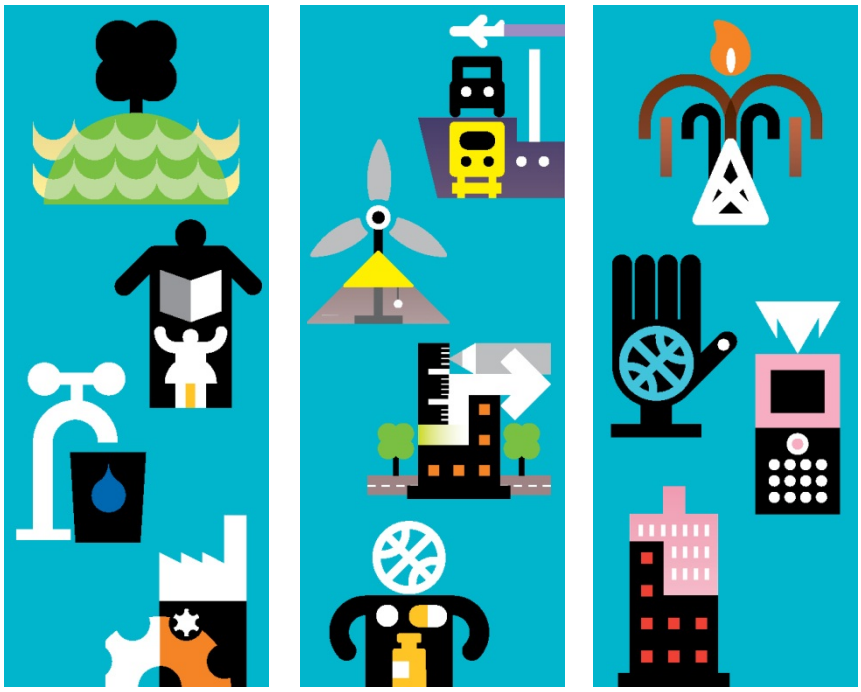
Potential risks of contamination of groundwater and land from the proposed processes are considered negligible.

Based on the previous use of the site as a brick works and an infilled pit, the possibility of previous land contamination cannot be ruled out. As there is no available data from previous ground investigations, it is not possible to confirm the level of contamination or the potential impact that it may have had on soil or groundwater quality. Therefore, the possibility of contamination during previous operations must be considered.

A review of BGS Geoindex undertaken in March 2014 identified that there are no site investigation reports available for the site. It has been recommended to Old Ferry Wharf Ltd to undertake ground investigations as they could be liable for any remediation of the site upon surrender of the permit, but they declined as they considered it unnecessary. The site has been in the same family ownership for over 100 years and any contamination would be considered historical. In addition, the site is only storing dry materials prior to export. There are no liquids stored in the vicinity of the SRF storage area and there is an impermeable surface and sealed drainage system to contain any leaks or spills. However, under the Environmental Permitting Regulations 2012 as amended, any remediation required in order to surrender the permit is the responsibility of the operator, and this will need to be taken into consideration.

6 References

[i] Ordnance Survey Map, Landranger 293 – Kingston Upon Hull & Beverley [October 2010]
[ii] British Geological Survey, Bedrock geology & Superficial deposits. [online map], 1:50,000, using Geology of Britain Viewer. URL http://mapapps2.bgs.ac.uk/geoindex/home.html [March 2014]
[iii] Institute of Geological Sciences, Sheet 2 Hydrogeological Map of North and East Lincolnshire. [online map], 1:126,720 (1967)
[iv] Environmental Agency, Interactive Maps, [online map], no scale specified; URL: http://maps.environment-agency.gov.uk/wiyby/wiybyController?ep=maptopics&lang=_e [March 2014]
[v] Envirocheck, Environmental and Geological Report (54201693_1_1) [March 2014]



Environmental Permit for Old Ferry Wharf

Non-Technical Summary - EES/336366/B2/03

April 2014

Neales Waste Management Ltd

Mott MacDonald

Environmental Permit for Old Ferry Wharf

Non-Technical Summary - EES/336366/B2/03

April 2014

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Issue and revision record

Revision	Date	Originator	Checker	Approver	Description	Standard
A	23/04/2014	Anita Manns	David Dray	David Dray		

Contents

Figures

1 Introduction

1.1 Non-Technical Summary Introduction

This document has been prepared by Mott MacDonald Ltd on behalf of Neales Waste Management Ltd and Old Ferry Wharf Ltd (OFW) to accompany and support the Environmental Permit (EP) Application for the transit storage of solid recovered fuel (SRF) at Old Ferry Wharf, Ferry, Road, Barrow Haven, North Lincolnshire DN19 7ET. The site is owned by Wm. Foster & Sons (Barrow Haven) Ltd and operated by a subsidiary, Old Ferry Wharf Ltd. The SRF will be exported from the site in accordance with the European Transfrontier Shipments of Waste Regulations 2007.

Old Ferry Wharf Ltd originally operated under Low Risk Waste Position LRW431 receiving Refuse Derived Fuel (RDF) for export from October 2012 to October 2013. This was later replaced with Regulatory Position Statement (RPS) 128 – Short term storage of RDF at a dockside. However, those sites that could not meet the terms of the RPS were allowed until 31/10/13 to either cease operations or apply for an Environmental Permit. As the site is within 500m of a SSSI, Ramsar site or European site, then the RPS did not apply and an Environmental Permit was required. The permit will cover the storage of Solid Recovered Fuel (SRF) prior to export only, to allow Old Ferry Wharf to continue its current operations. No other waste management activity will take place under this permit.

Old Ferry Wharf Ltd operates its own Environmental Management System (EMS) to ISO 14001:2004 (unaccredited) standard for its sites with Work Instructions (WI's) derived from Risk Assessments for all its activities and equipment. A summary of the EMS and policy can be found in document EES/336366/B4/03.

The site activities will be managed and operated in accordance with the management plan and the EMS. All Management Plans for the site operations will be reviewed at least annually.

The site infrastructure has been designed for the purpose of storing SRF, in accordance with the specific requirements of relevant Environmental Legislation. In addition, the basic requirements of Planning Permission and Health and Safety legislation have all been included in the design of the site infrastructure and will be maintained to continue to meet these requirements

The permit application will be submitted with all the required documents in compliance with the Environmental Permitting (England & Wales) Regulations 2010, including a management plan which will set the requirements for the management of the permitted area, emission control measures etc.

The documents required to be submitted with the Application are:

- Plans – document reference EES/336366/B2/01
- Site Condition Report (SCR) – document reference EES/336366/B2/02
- Non-Technical Summary (NTS) – document reference EES/336366/B2/03
- Environmental Risk Assessment (ERA) – document reference EES/336366/B2/04
- Management Plans – document reference EES/336366/B4/01
- Odour Management Plan – document reference EES/336366/B4/02
- Accident Management Plan – document reference EES/336366/B4/04

These documents have been compiled in accordance with the requirements laid down in the Regulations and any associated and relevant guidance.

2 Site Description

2.1 Location and Setting

The site is owned by William Foster and Sons Ltd and operated by Old Ferry Wharf Ltd, occupying an area of approximately 2ha.

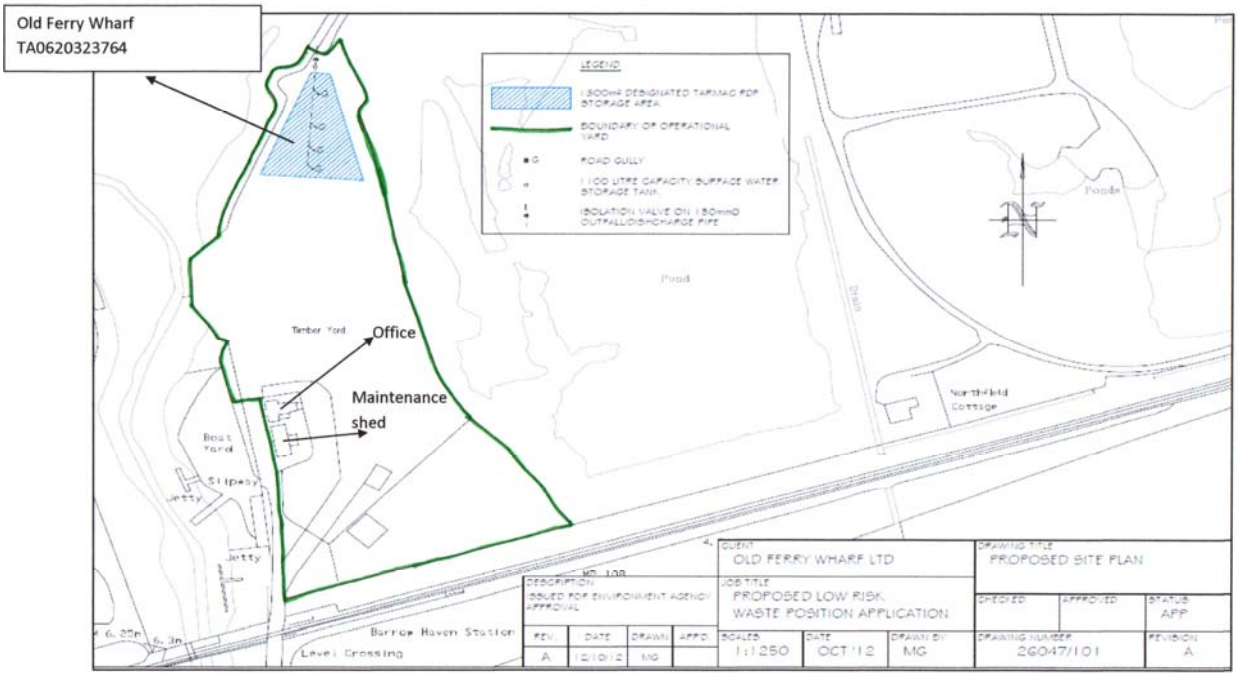
The site is situated off Ferry Road in Barrow Haven, North Lincolnshire DN19 7ET and is centred on NGR TA 06203 23764. Old Ferry Wharf is located on land adjacent to the confluence of The Beck and the River Humber, north of the village of Barrow Haven.

The northern half of the site comprises a concrete hard standing storage area. The southern half comprises a combination of a number of buildings, some of which are surrounded by a small wooded area, and further hard standing area, which is used for storage of commercial goods. A car park is located at the south west corner of the site adjacent to the site office. To the east is a small area of grassland. The site has a public right of way and footpath running through it, which must be kept clear and accessible at all times. The footpath runs from the entrance of the site to the south, between the SRF storage compound and the jetty and up to the north of the site.

A 1,300m^2 flat, concrete storage area is located at the northern perimeter of the site and includes an integrated drainage system that outputs to a 1,100L leachate/rainwater storage tank situated to the north of the storage area. The storage area is surrounded at the north, west and east sides by a screen constructed from interlocking concrete blocks. This is the area proposed for the storage of SRF.

A flat surfaced concrete jetty is located at the western perimeter of the site.

Figure 2.1: Site Plan



Source: Old Ferry Wharf, April 2014

2.2 Development History

The site has been an industrial site involved in tile and brick manufacturing since the early 1900's until 1968.

Planning Permission was granted to William Foster and Sons Ltd on 8th December 1977 to replace an existing wooden jetty with a concrete jetty for leisure and recreational pursuits. On 5th June 1980, Wm. Foster & Sons (Barrow Haven) Ltd. were awarded planning permission to operate as a trans-shipment storage area for importing and exporting commercial goods via the concrete jetty. The site has been operated by subsidiary Old Ferry Wharf Ltd since 1986.

On 12th March 2012 North Lincolnshire Council confirmed in a letter to Old Ferry Wharf Ltd that Old Ferry Wharf Ltd did not need any further permission to undertake storage of SRF at the site. A copy of the Planning Permission dated 5th June 1980 and the letter have been submitted with the Environmental Permit Application Forms.

2.3 Access

The site will be accessed from Ferry Road, which is located approximately 4 miles from the nearest main road, the A15 from the Humber Bridge to M180. Access to the Humber Estuary is via the wharf adjacent to the site and located on a tributary approximately 200 metres upstream of the river.

2.4 Site Design

The site has been designed for the storage and exportation of goods including baled SRF delivered to the site by waste management company, Neales Waste Management Ltd. The handling and storage will be in accordance with the specific requirements of Environmental Legislation. In addition, the basic requirements of Planning Permission and Health and Safety Legislation have all been included in the site design. The site infrastructure is maintained to continue to meet these requirements.

The access road to the site and the extent of the site is predominantly hard surfaced. All designated vehicle routes are hard surfaced as is the SRF storage area.

2.5 Site Activities

Old Ferry Wharf Ltd currently handles bulk commodities in bags, in a baled form or on pallets. These commodities can include steel sections and coils, bricks, tiles, timber and finished goods both for import and export trades. In addition to these commodities, the wharf and its 1ha storage yard are used for forwarding and distributing Baltic timber products. The movement of these commodities does not need to be subject to the Environmental Permitting Regulations 2010 (as amended), as these materials are not wastes.

As discussed in Section 1.1 the site was originally operated under Low Risk Waste Position LRW431 receiving Refuse Derived Fuel (RDF) for export from October 2012 to October 2013. This was later replaced with Regulatory Position Statement (RPS) 128 “Short term storage of RDF at a dockside”. However, as the site is 500m of a SSSI, Ramsar site or European site it could not meet the terms of the RPS and an Environmental Permit application is required.

The permit will cover the storage of Solid Recovered Fuel (SRF), categorised as non-hazardous waste, prior to export only. No other waste management activity will take place under this permit. The permit is required in order that Old Ferry Wharf Ltd can continue to accept waste derived material for export via ship at the site.

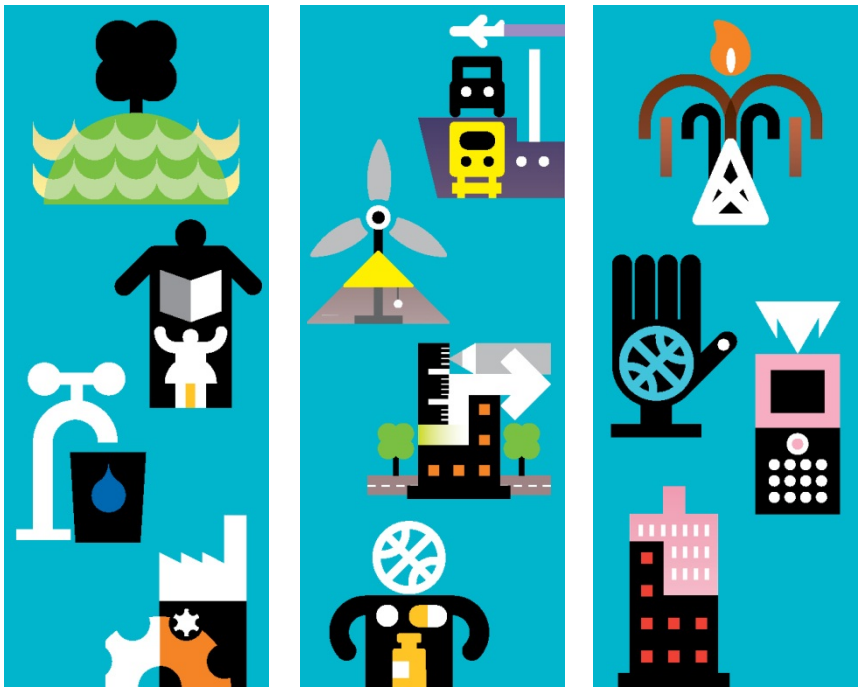
SRF bales will be stockpiled in a designated area and stored for a 7-21 day period or until 3000 tonnes for a shipment is reached, whichever is sooner) before transferred to the concrete jetty and exported via ship. The SRF storage area has a total capacity of 4,999 tonnes (to allow for contingencies), but the site will accept no more than 30,000 tonnes of SRF per annum.

2.6 Site Management

The permitted activities will be overseen by a Technically Competent Manager (TCM), under the WAMITAB scheme. The site employs a TCM who visits the site regularly to ensure the activities are compliant with the conditions of the permit and in line with the Management Plans.

3 Summary

The permit application will regularise, under the current permitting system, and enable the continuation of operations that have been undertaken at the site for many years. A set of management procedures are in place to manage and operate the site and that the site would be subject to regular audits and inspections from the Environment Agency.



Environmental Permit for Old Ferry Wharf

Environmental Risk Assessment - EES/336366/B2/04

April 2014

Neales Waste Management Ltd

Mott MacDonald

Environmental Permit for Old Ferry Wharf

Environmental Risk Assessment - EES/336366/B2/04

April 2014

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Issue and revision record

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A	13/03/14	Ed Rose	Lisa Huckstep	David Dray	Draft	
B	30/04/14	Ed Rose	Natasha Nixon	David Dray	Final	

Contents

1 Environmental Risk Assessment

1.1 Introduction

This document has been prepared by Mott MacDonald Ltd on behalf of Old Ferry Wharf Ltd. to accompany and support the Environmental Permit Application for the storage of in transit secondary waste-derived fuel at Old Ferry Wharf, Barrow Haven, North Lincolnshire DN19 7ET. The application is being made under the Environmental Permitting Regulations 2010 (as amended).

This report provides an assessment of the identified risks to the environment and human health in view of operations at site including those arising from maintenance, accidents, incidents, non-conformances or as a result of a complaint. The environmental risk assessment considers the risks from site activities that may be known or drawn to the attention of the operator.

The risk assessment will be submitted with the specific management plans, which will set the requirements for the management of the permitted area, as part of the environmental permit application. All control measures within the conditions must be adhered to in order to obtain the permit.

The normal operations on site include road delivery of baled secondary recovered fuels (SRF) to the site, unloading and movement of the bales, temporary storage of the SRF in a contained storage area for between 7-21 days and loading of the SRF onto transport ships via a jetty. The SRF is produced to the BS EN 15359:2011 standard, solid recovered fuels, specifications and classes. The secondary waste-derived fuel storage capacity at the site is 4,999 tonnes.

The secondary waste-derived fuel will be stored on a purpose engineered 1,300m2 flat area. The area is impermeably surfaced and includes an interlocked wall around the storage area to reduce the potential impact of wind on the stored bales. An engineered underground drainage system connected to a 1,100L capacity storage tank is accessible via inlets at the storage area surface to store water that has accumulated on the hard surface or produced through any wash-down.

The basic requirements of Planning Permission, Building Regulations and Health and Safety Legislation have all been included in the design of the storage area and wider site. The site infrastructure will be maintained to continue to meet these requirements.

The site activities and operations will be managed and operated in accordance with the Management Plans and in conjunction with the conditions in the permit. The site is managed using technically competent personnel in accordance with a WAMITAB Certificate of Technical Competence.

This document assesses risks to the environment, amenity and human health in accordance with the Environment Agency's H1 Environmental Risk Assessment framework. It identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of the operator as a result of a complaint. The environmental risks, during normal operation and due to accidents, considered in this report are:

- Noise and vibration;
- Waste handling and storage (including hazardous);

- Odour;
- Litter;
- Particulate matter;
- Vermin and insects (pests); and
- Fugitive emissions to air, land and water.

The site is located adjacent to the Humber Estuary, which has been designated as:

- Site of Specific Scientific Interest (SSSI);
- Special Protection Area (SPA);
- Special Areas of Conservation (SAC) RAMSAR area;
- Inshore Special Area of Conservation with Marine Components (ISAC); and
- Inshore Special Protection Area with Marine Components (ISPA).

As the site is in close proximity to a Ramsar and European designated sites, it will be necessary to undertake an Appropriate Assessment Screening Matrix (AASM) (in accordance with the Conservation of Habitats and Species Regulations 2010) in order to consider any impacts on the conservation objectives of the site. It will also be necessary to request SSSI assent from Natural England, as the SSSI (Humber Estuary) is proximate to the site and site activities include operations that require consent.

The Environmental Risk Assessment (ERA) has considered each of these areas in addition to local human activity in assessing and mitigating risks that could arise from normal operations of the site and any incidents or accidents that could potentially occur.

The ERA identifies the impacts on the different receptors in close proximity to the site and provides an assessment of the risks to these areas. Risk management and mitigation is further detailed in specific management plans, which are referenced in this document and appended to the environmental permit application. The Management Plans can be found in document reference EES/336366/B4/01.

2 Risk Assessment

Noise and Vibration									
Data and Information				**Judgement**				**Action (by permitting)**	
Receptor	**Source**	**Harm**	**Pathway**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Risk management**	**Residual risk**
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequence be if this occurs?**	**What is the overall magnitude of risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of risk after management?**
Local domestic, commercial properties and Barrow Haven rail station	Vehicles delivering SRF to site.	Nuisance, loss of amenity, loss of sleep	Noise through the air and vibration through the ground.	Medium	Low	Low	Current operational experience.	Implementation of a noise and vibration management plan. Limitation of loading, movement and unloading to hours 06.30 – 19.30hrs or sunset, whichever is the later, 7 days per week including bank holidays., as stated in planning permission.	Low
Local domestic, commercial properties Barrow Haven rail station Humber Estuary/ European designated areas in locality	Ships docking at jetty for loading of SRF	Nuisance, loss of amenity, loss of sleep Effect on European designations in locality	Noise through the air and vibration through the ground.	Low	Medium	Low	Current operational experience and low proximity to noise sensitive receptors. Site office and staff more directly affected.	Implementation of a noise and vibration management plan. Limitation of loading, movement and unloading to hours 06.30 – 19.30hrs or sunset, whichever is the later, 7 days per week including bank holidays, as stated in planning permission.	Low

Noise and Vibration									
Data and Information				**Judgement**				**Action (by permitting)**	
Receptor	**Source**	**Harm**	**Pathway**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Risk management**	**Residual risk**
Local domestic, commercial properties and Barrow Haven rail station	Staff Vehicles arriving / leaving the site	Nuisance, loss of amenity	Noise through the air and vibration through the ground.	Low	Low	Low	Current operational experience. Proximity to other industrial units and similar activities. Site office and staff more directly affected.	Implementation of a noise and vibration management plan. Limitation of loading, movement and unloading to hours 06.30 – 19.30hrs or sunset, whichever is the later, 7 days per week including bank holidays, as stated in planning permission.	Low
Local domestic, commercial properties Barrow Haven rail station Humber Estuary/ European designated areas in locality	Loading, unloading and movement of SRF	Nuisance, loss of amenity. Effect on European designations in locality	Noise through the air and vibration through the ground.	Medium	Low	Low	Low proximity to noise and vibration of sensitive receptors. Site office and staff more directly affected. Noise produced would not be a significant increase relative to other activities in the area.	Proper maintenance of plant and equipment. Limitation of operating hours as above. Equipment turned off when not in use.	Low

Waste handling and storage (including hazardous)									
Data and Information				**Judgement**				**Action (by permitting)**	
Receptor	**Source**	**Harm**	**Pathway**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Risk management**	**Residual risk**
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequence be if this occurs?**	**What is the overall magnitude of risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of risk after management?**
Local population Other industrial users Site offices and site staff European designated areas in locality	General wastes	Pollution of environment, effect on local wildlife designations, effect on fauna and flora. Nuisance.	Water/ drainage transport	Medium	Medium	Medium	Site office and staff directly affected. Local environment affected	SRF acceptance and storage procedures implemented and adhered to (see Management Plans). All SRF bales will be stored on an impermeable surface and in appropriate containers or bunded areas suitable for the purpose, where necessary. The SRF bales are visually inspected during removal, storage and loading. Non-conforming items removed and quarantined in a secure area ready for removal. Waste management operations will be restricted to the impermeable dry dock and impermeable waste storage areas described in the management plan and kept within the permitted area. Stored SRF will be removed from site in accordance with the management plan. Only those quantities of materials described in the management plans will be stockpiled on site. All general wastes produced through maintenance will be removed by licensed waste carriers.	Low

Waste handling and storage (including hazardous)									
Data and Information				**Judgement**				**Action (by permitting)**	
Receptor	**Source**	**Harm**	**Pathway**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Risk management**	**Residual risk**
Local population Other industrial users Site offices and site staff European designated areas in locality	Hazardous liquids Hazardous material storage e.g. red diesel	Pollution of aquatic environment, effect on local wildlife designations, effect on fauna and flora. Nuisance. Pollution of environment Effect on fauna and flora. Nuisance.	Water/ drainage transport Physical contact with waste	Low	High	Medium	Site office and staff directly affected. Local aquatic environment affected Hazardous nature could cause significant impacts to the environment.	No hazardous waste will be accepted or permitted on the site. Red diesel is used for the forklift trucks and is stored in a bunded, mobile tank in the maintenance shed. Hazardous wastes produced through maintenance activities of plant and equipment or spillages will be stored in appropriate containers e.g. absorbents or similar wastes Containers will be kept in the maintenance shed. This waste container and its contents will be labelled, and details of the waste will be recorded before the waste is placed in the container. If in doubt as to the nature of the waste and action to be taken, further advice will be sought as a matter of urgency. Any damaged containers or bags will be immediately placed in a serviceable container or bag, sealed with an appropriate tie and marked "Hazardous Spillage" (or as required by current legislation). The integrity of the containers used will be checked by the Site Manager on a daily basis. When nearly full or within 12 months (whichever is sooner) the Site Manager will arrange the collection and disposal of the waste. Environment Agency will be informed of any accident involving potentially hazardous substances.	Low

Odour									
Data and Information				**Judgement**				**Action (by permitting)**	
Receptor	**Source**	**Harm**	**Pathway**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Risk management**	**Residual risk**
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequence be if this occurs?**	**What is the overall magnitude of risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of risk after management?**
Local domestic, commercial properties, Barrow Haven rail station	General site operations	Nuisance, loss of amenity	Air transport then inhalation.	Low	Low	Low	The installation would not be considered to be low impact if it could give rise to odour noticeable outside the site boundary. Local residents and staff often sensitive to odour. Impact is one of nuisance rather than harm. Low proximity to odour sensitive receptors.	SRF is stored in sealed bales to reduce odour emissions to a negligible level, in accordance with the management plans. Split or damaged bales will be repaired, where possible, on site using industrial tape. Where this in not possible Neales Waste Management Ltd will be contacted to remove or repair the bales.	Low

Odour									
Data and Information				**Judgement**				**Action (by permitting)**	
Receptor	**Source**	**Harm**	**Pathway**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Risk management**	**Residual risk**
Local domestic, commercial properties and Barrow Haven rail station European designated areas in locality	Site is not managed in a safe and proper manner	Detriment to local amenity, Nuisance Effect on wildlife	Air transport then inhalation	Low	Low	Low	Low proximity to sensitive receptors.	Overall management controlled by Technically Competent Manager. Site will be managed by WAMITAB holder. Staff trained in operations and procedures Suitable competent/qualified contractors used for maintenance and repairs and other design or construction works required. Proven operational controls and procedures in place. Relevant documents and records identified, controlled and up dated.	Low
Local domestic, commercial properties and Barrow Haven rail station European designated areas in locality	Fumes and emissions from operating mobile plant, crane and marine and land vehicles	Nuisance, loss of amenity. Pollution of air. Effect on wildlife	Atmospheric pollution	Low	Low	Low	Low proximity to sensitive receptors.	Mobile plant, crane and vehicles designed and installed by competent supplier. Mobile plant, crane and vehicles regularly serviced and maintained by competent people in accordance with manufacturers guidelines and/or warranty. Mobile plant and crane operates within emissions limits as recommended by supplier/manufacturer. Maintenance schedule up dated and used. Established operational controls and procedures in place.	Low

Odour									
Data and Information				**Judgement**				**Action (by permitting)**	
Receptor	**Source**	**Harm**	**Pathway**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Risk management**	**Residual risk**
Local domestic, commercial properties and Barrow Haven rail station	Flooding	If contaminated water is washed off site it may contaminate buildings, gardens, water courses, natural habitats etc causing odorous emissions	Flood waters.	Low	Low	Low	Low proximity to sensitive receptors.	Activities to be managed and operated in accordance with a management system and management plans and procedures implemented. SRF is securely sealed in bales in a contained storage area.	Low
Local domestic, commercial properties and Barrow Haven rail station European designated areas in locality	Arson/ vandalism causing the release of polluting materials to air (smoke and fumes), land or water	Harm to human health – respiratory irritation, illness and nuisance to local population. Pollution of air. Effect on wildlife	Air transport of smoke.	Low	High	Medium	Local residents and staff often sensitive to odour/fumes Site office and staff more directly affected.	Management system includes security, fires and spillages management plans. A site identification board will be erected at the site entrance displaying emergency contact details. The site will be kept locked and secured outside of operational hours. Any contaminated surface water (e.g. fire water) on the site area will drain to the sealed drainage system for removal off site.	Low

Odour									
Data and Information				**Judgement**				**Action (by permitting)**	
Receptor	**Source**	**Harm**	**Pathway**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Risk management**	**Residual risk**
Local domestic, commercial properties and Barrow Haven rail station European designated areas in locality	Accidental fire causing the release of polluting materials to air (smoke or fumes), land and water	Harm to human health – respiratory irritation, illness and nuisance to local population. Pollution of air. Effect on wildlife	Air transport of smoke.	Low	High	Medium	Local residents and staff often sensitive to odour/fumes Site office and staff more directly affected.	Management system includes security, fires and spillages management plans. Site management shall ensure the programme of preventative maintenance is implemented effectively to minimise the probability of fire through faulty plant, equipment or vehicles. Smoking only permitted in designated areas. A site identification board will be erected at the site entrance displaying emergency contact details. Any contaminated surface water (e.g. fire water) on the site area will drain to the sealed drainage system for removal off site.	Low

Litter									
Data and Information				**Judgement**				**Action (by permitting)**	
Receptor	**Source**	**Harm**	**Pathway**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Risk management**	**Residual risk**
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequence be if this occurs?**	**What is the overall magnitude of risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of risk after management?**
Other industrial users Site offices European designated areas in locality Local human and animal population	Carrying/ loading/ unloading waste and from waste storage areas	Nuisance, Loss of amenity. Harm to animal health. Effect on wildlife	Air transport then deposition	Medium	Medium	Medium	Industrial users and animals sensitive to litter. Sensitivity of local area.	The SRF arrives in secure bales on a curtain sided trailer. Regular inspections are undertaken of the bales and the area around the storage area. Litter picking will be undertaken when necessary. SRF is stored in sealed bales to reduce the production of litter to a negligible level, in accordance with the management plans. Split or damaged bales will be repaired, where possible, on site using industrial tape. Where this in not possible Neales Waste Management Ltd will be contacted to remove or repair the bales.	Low

Particulate Matter									
Data and Information				**Judgement**				**Action (by permitting)**	
Receptor	**Source**	**Harm**	**Pathway**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Risk management**	**Residual risk**
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequence be if this occurs?**	**What is the overall magnitude of risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of risk after management?**
Haul roads, Local amenity European designated areas in locality	Dust transferred due to vehicle movements	Nuisance, loss of amenity Effect on wildlife	Air / wind-blown.	Low	Medium	Low	All roads and vehicle movement areas are hard surfaced. Local residents often sensitive to dust	Haul roads will be damped down during dry weather as required. Roads or surfaces on site will be swept if mud and debris build up is identified	Low
Local domestic, commercial properties and Barrow Haven rail station Local amenity European designated areas in locality	Releases of particulate matter (VOCS or dust) from vehicles, plant and equipment	Harm to human health, respiratory irritation and illness Effect on wildlife	Air transport then inhalation.	Low	Medium	Low	There is low potential for exposure to anyone living or working close to the site (apart from the operator and employees)	Mobile plant, crane and vehicles designed and installed by competent supplier. Mobile plant, crane and vehicles regularly serviced and maintained by competent people in accordance with manufacturers guidelines and/or warranty. Mobile plant and crane operates within emissions limits as recommended by supplier/manufacturer. Maintenance schedule up dated and used. Established operational controls and procedures in place.	Low

Fugitive Emissions to Air, Land and Water									
Data and Information				**Judgement**				**Action (by permitting)**	
Receptor	**Source**	**Harm**	**Pathway**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Risk management**	**Residual risk**
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequence be if this occurs?**	**What is the overall magnitude of risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of risk after management?**
Local amenity European designated areas in locality	Arson/ vandalism causing the release of polluting materials to air (smoke and fumes), land or water	Harm to human health – respiratory irritation, illness and nuisance to local population. Injury to staff, fire-fighters or arsonists/ vandals. Pollution of air, land and water Effect on wildlife	Air transport of smoke. Spillages and contaminated firewater via surface water gulleys.	Low	High	Medium	Local residents often sensitive to smoke and fumes. Site office and staff more directly affected.	Management system includes security, fires and spillages management plans. A site identification board will be erected at the site entrance displaying emergency contact details. The site will be kept locked and secured outside of operational hours. Any contaminated surface water (e.g. fire water) on the site area will drain to the sealed drainage system for removal off site.	Low

Fugitive Emissions to Air, Land and Water									
Data and Information				**Judgement**				**Action (by permitting)**	
Receptor	**Source**	**Harm**	**Pathway**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Risk management**	**Residual risk**
Local amenity European designated areas in locality	Accidental fire causing the release of polluting materials to air (smoke or fumes), land and water	Harm to human health – respiratory irritation, illness and nuisance to local population. Injury to staff or fire-fighters. Pollution of air, land and water Effect on wildlife	Air transport of smoke. Spillages and contaminated firewater via surface water gulleys.	Low	High	Medium	Risk of fire from equipment and plant is moderate. Risk of fire caused by smoking is low. Site office and staff more directly affected.	Management system includes security, fires and spillages management plans. Site management shall ensure the programme of preventative maintenance is implemented effectively to minimise the probability of fire through faulty plant, equipment or vehicles. Smoking only permitted in designated areas. A site identification board will be erected at the site entrance displaying emergency contact details. Any contaminated surface water (e.g. fire water) on the site area will drain to the sealed drainage system for removal off site.	Low
Local amenity European designated areas in locality	Spillages of liquids, contaminated rain water, fire water.	Acute effects: oxygen depletion, fish kills and algal blooms. Chronic effects: deterioration of water quality Effect on wildlife	Direct run off from the site at eastern border.	Low	Medium	Low	Harm to animals and recreational use of area. Low volume of potentially polluting liquids attained on site.	A programme of preventative maintenance of equipment, plant, cranes and vehicles is implemented. Ensure any repairs to drainage system are completed as soon as practicable. Any contaminated surface water (e.g. fire water) on the site area will drain to the sealed drainage system for removal off site. Spill equipment and training in its correct use is provided.	Low

Fugitive Emissions to Air, Land and Water									
Data and Information				**Judgement**				**Action (by permitting)**	
Receptor	**Source**	**Harm**	**Pathway**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Risk management**	**Residual risk**
European designated areas in locality Humber Estuary	Flooding on site.	Acute effects: oxygen depletion, fish kills and algal blooms. Chronic effects: deterioration of water quality.	Flood waters.	Low	Medium	Low	Harm to animals and recreational use of area. Low volume of potentially polluting liquids attained on site.	Surface water will be diverted to the sealed drainage system whilst waste is stored on site. The drainage system can be opened to divert clean surface water into the river when the site is not storing waste. SRF is securely sealed as bales and kept in a contained area to reduce fugitive releases to water. Activities to be managed and operated in accordance with a management system and management plans and procedures implemented.	Low
Local land, Groundwater	Flooding on site	If contaminated water is washed off site it may contaminate buildings and the surrounding land.	Flood waters.	Low	Medium	Low	Oil leaks and SRF is considered to be the only potential pollutants.	Activities to be managed and operated in accordance with a management system and management plans and procedures implemented. Spill equipment and training in its correct use is provided. Contaminated water can be diverted into the sealed water storage tank.	Low

Fugitive Emissions to Air, Land and Water									
Data and Information				**Judgement**				**Action (by permitting)**	
Receptor	**Source**	**Harm**	**Pathway**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Risk management**	**Residual risk**
Groundwater	Spillages of liquids, contaminated rain water, blockages, fire water etc	Chronic effects, contamination of groundwater, requiring treatment of water or closure of borehole	Transport through soil/ groundwater.	Low	Medium	Low	Low likelihood of spills affecting groundwater as no direct pathway. All SRF storage surfaces are impermeable.	A programme of preventative maintenance of equipment, plant, cranes and vehicles is implemented effectively. Ensure any repairs to drainage system are completed as soon as practicable. Spill equipment and training in its correct use is provided. SRF is baled securely and stored on an area of impermeable surface with a sealed drainage system. SRF is a solid material and unlikely to impact on groundwater.	Low

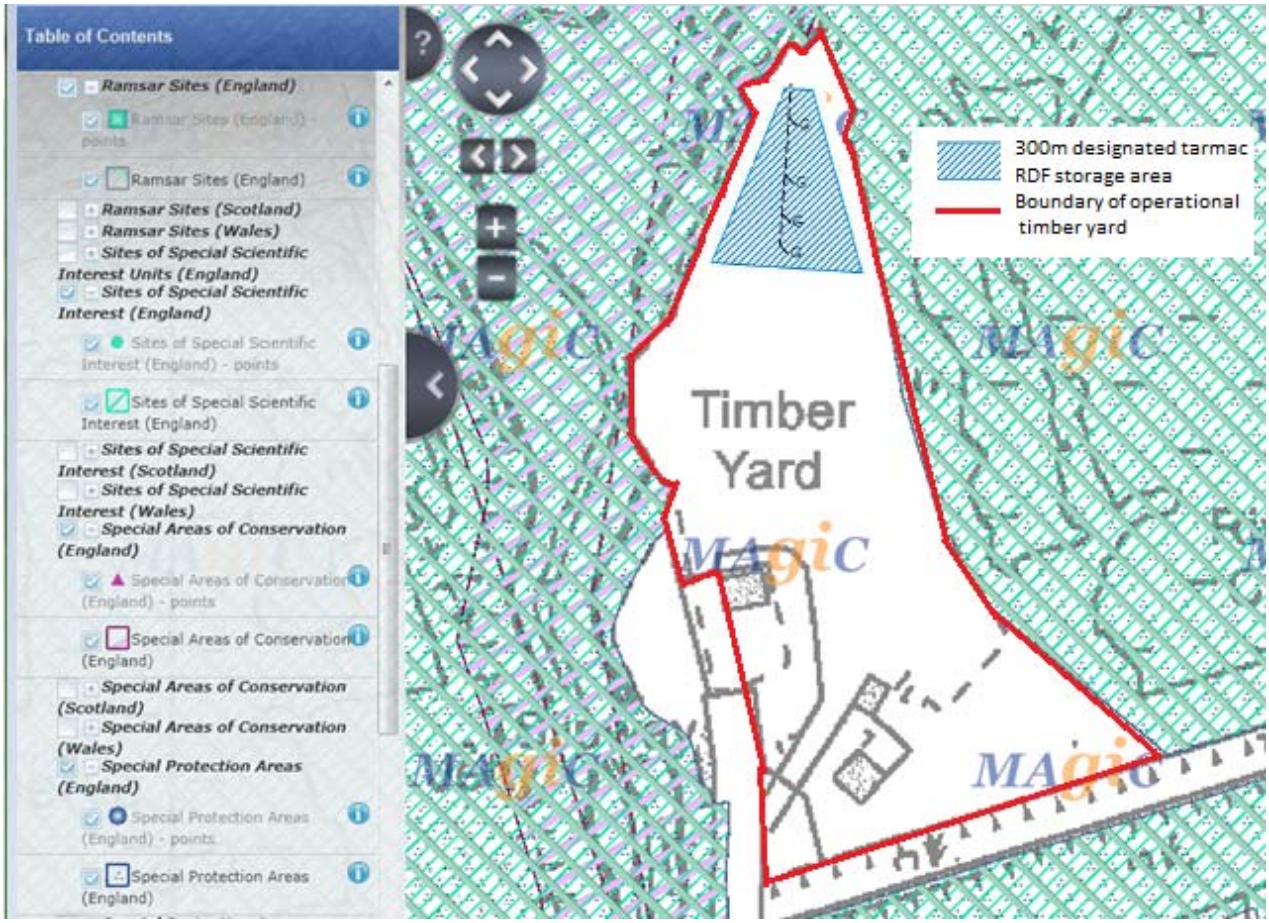
Birds, Vermin and Insects									
Data and Information				**Judgement**				**Action (by permitting)**	
Receptor	**Source**	**Harm**	**Pathway**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Risk management**	**Residual risk**
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequence be if this occurs?**	**What is the overall magnitude of risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of risk after management?**
Local human population European designated areas in locality	Pests & Vermin e.g. flies, insects	Nuisance and loss of amenity Vermin may have an effect on ground nesting birds, due to the possibility of them eating birds' eggs.	Air transport and over land	Medium	Low	Low	There is no potential risk of vermin or pests due to specific operations undertaken.	Monitor for pests and vermin. Proven operational controls and procedures in place, including regular inspection, monitoring and action to be taken to manage vermin on site, where necessary. SRF is securely sealed in bales to reduce any potential risks relating to birds, vermin or insects. SRF is not considered an attractive food source for birds, vermin or insects. The processes used to produce the SRF will reduce the possibility of insect eggs being present in the final SRF.	Low
Protected/ wild birds, other animals as part of the designated sites.	Any	Harm to human health – from wastes carried off-site and faeces. Nuisance and loss of amenity. Injury or death of protected species, damage or destruction of nest and eggs	Nesting birds on site	Medium	Medium	Medium	The site is located adjacent to the Humber Estuary and is identified as being proximate to a SSSI, SAC, SPA and RAMSAR site.	A ground survey for nesting birds should be undertaken on the site prior to the commencement of any works. Obtain further advice if any ground nesting birds found.	Low

3 Site Environmental Setting

3.1 Sensitive habitats

Surrounding the site is the Humber Estuary, designated as a SSSI, SPA, SAC and Ramsar. The majority of these designations overlap each other and surround the area, with the exception the SPA, which is situated along the western boundary of the Scheme. This has been illustrated in the following map and in Appendix A, which shows the wider surrounding area.

Map 3.1: Extract of the map from Appendix A, showing the locations of statutory designated sites in relation to the Scheme.



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The Humber Estuary is comprised of the following habitat types:

- Atlantic salt meadows and a range of sand dune types in the outer estuary, together with subtidal sandbanks;
- Extensive intertidal mudflats; and
- Coastal lagoons.

The site qualifies as a Ramsar due to the representative example of a near-natural estuary; breeding colony of Grey seal (Halichoerus grypus); and bird assemblages and species of international importance including, Bar-tailed Godwit Limosa lapponica, Golden Plover Pluvialis apricaria, Hen Harrier Circus cyaneus, Redshank Tringa tetanus and Sanderling Calidris alba. The site is considered vulnerable to habitat management, abstraction of fresh water, illegal access and coastal squeeze.

The site qualifies as an SAC due to the estuary and mudflat habitats present. The following species are a qualifying feature, but not a primary reason in determining that the site is designated as a SAC:

- Sea lamprey Petromyzon marinus - is reasonably widespread in UK rivers. In some places it is still common, but it has declined in parts of its range and has become extinct in a number of rivers;
- River lamprey Lampetra fluviatilis - UK populations are considered important for the conservation of the species at an EU level; and
- Grey seal Halichoerus grypus - among the rarest seals in the world: the UK population represents about 40% of the world population and 95% of the EU population are qualifying features for the site being designated as a SAC.

The site has also been designated an SPA as the site supports a wide range of bird populations during the breeding season; over winter; and during migration. The site also qualifies as it supports an internationally important assemblage of birds outside the breeding season. The site is considered vulnerable to a range of anthropogenic impacts, including construction and coastal squeeze.

The SSSI designation has been granted as the estuary is a nationally important site with a series of nationally important habitats. These include the estuary itself (with its component habitats of intertidal mudflats and sandflats and coastal saltmarsh) and the associated saline lagoons, sand dunes and standing waters. The site is also of national importance for the geological interest at South Ferriby Cliff (Late Pleistocene sediments) and for the coastal geomorphology of Spurn.

3.2 Conclusion

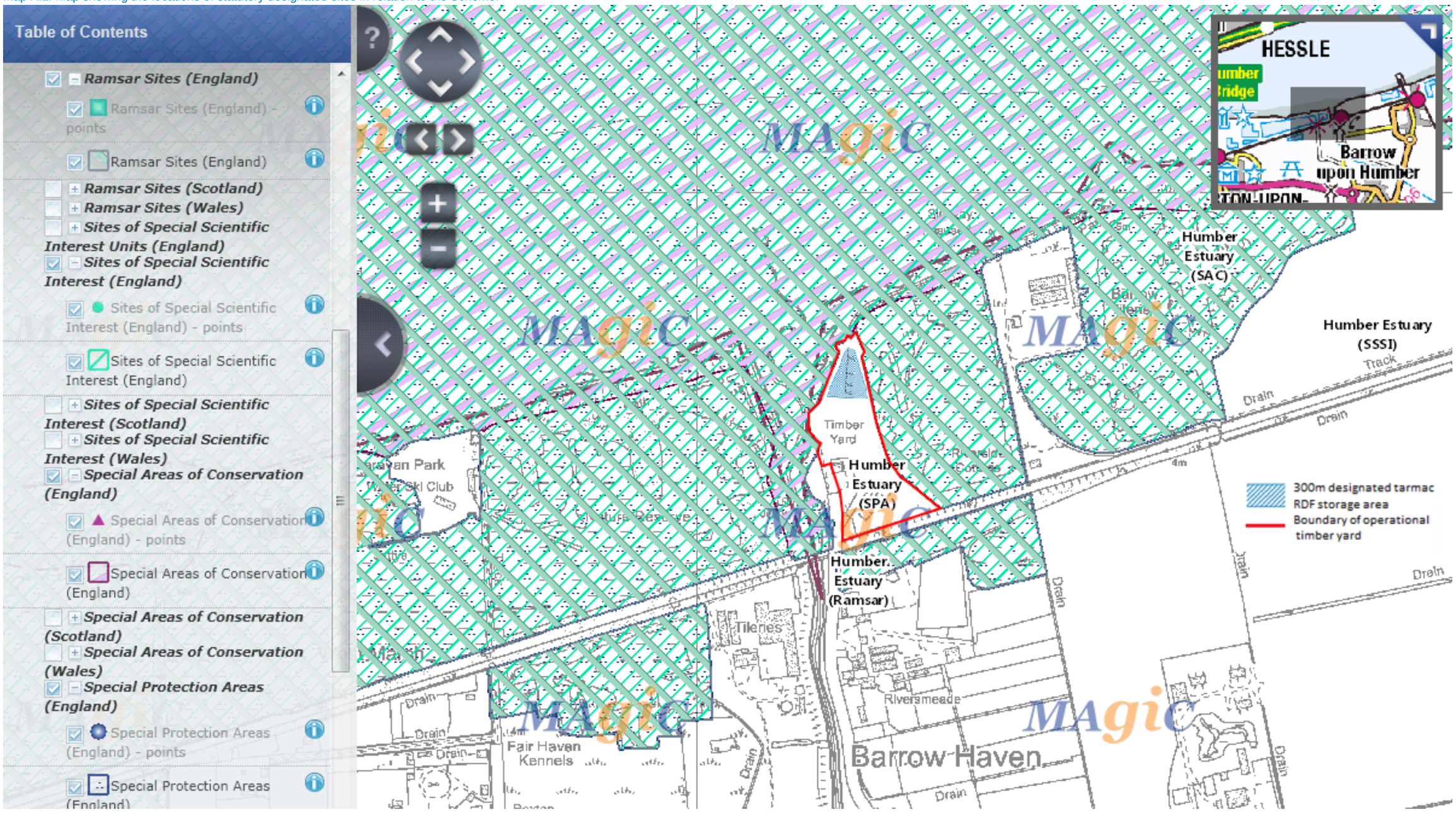
Potentially the sensitive habitats surrounding the site could be impacted through litter, noise, dust and groundwater contamination.

If the procedures in the Risk Assessment and Management Plans are followed the habitats and species mentioned above are unlikely to be affected by the works. Therefore, the likely impact overall in relation to the SRF storage facility is considered minimal.

Appendices

Appendix A. Location Plan

Map A.1: Map showing the locations of statutory designated sites in relation to the Scheme.



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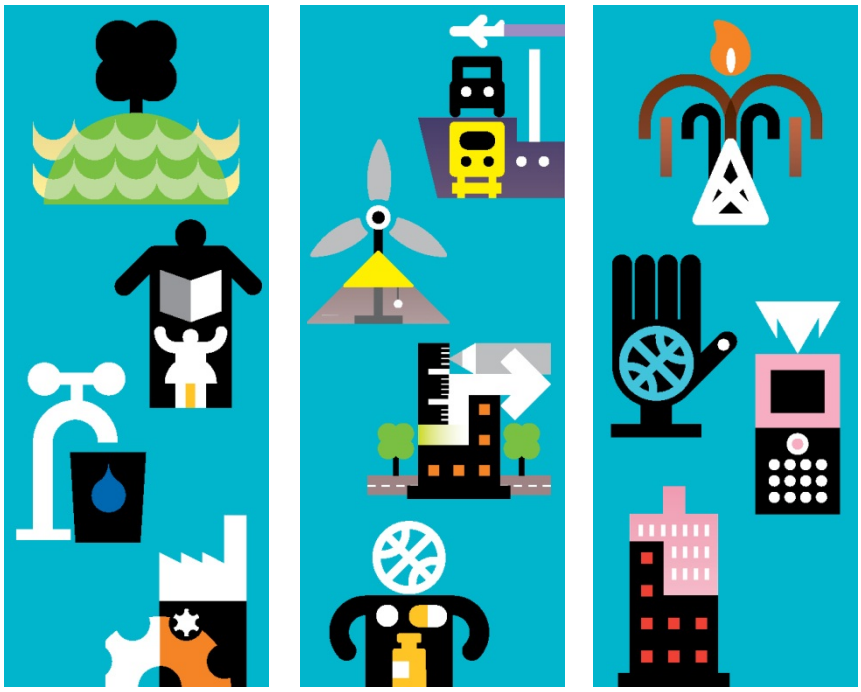

Environmental Permit for Old Ferry Wharf

Management Plan - EES/336366/B4/01

April 2014

Neales Waste Management Ltd.

Environmental Permit for Old Ferry Wharf

Management Plan - EES/336366/B4/01

April 2014

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Revision	Date	Originator	Checker	Approver	Description	Standard
A	17nd April 2014	Ed Rose	Anita Manns	David Dray	First Issue	
B	23rd April 2014	Ed Rose	Anita Manns	David Dray	Final	

Contents

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1 Introduction

1.1 Background

This document has been prepared by Mott MacDonald Ltd on behalf of Neales Waste Management Ltd and Old Ferry Wharf Ltd to accompany and support the Environmental Permit (EP) Application for the transit storage of solid recovered fuel (SRF) at Old Ferry Wharf, Ferry, Road, Barrow Haven, North Lincolnshire DN19 7ET. The site is owned by Wm. Foster & Sons (Barrow Haven) Ltd and operated by a subsidiary, Old Ferry Wharf Ltd. The SRF will be exported from the site in accordance with the European Transfrontier Shipments of Waste Regulations 2007.

Old Ferry Wharf Ltd originally operated under Low Risk Waste Position LRW431 receiving Refuse Derived Fuel (RDF) for export from October 2012 to October 2013. This was later replaced with Regulatory Position Statement (RPS) 128 – Short term storage of RDF at a dockside. However, those sites that could not meet the terms of the RPS were allowed until 31/10/13 to either cease operations or apply for an Environmental Permit. As the site is within 500m of a SSSI, Ramsar site or European site, then the RPS did not apply and an Environmental Permit was required. The permit will cover the storage of Solid Recovered Fuel (SRF) prior to export only. No other waste management activity will take place under this permit. This document does not identify any permitted or non-permitted activities that the site may decide to undertake in the future.

The application is being made under the Environmental Permitting Regulations 2010 (as amended).

This document details the activities undertaken at site and the management plans put in place to operate and manage those activities. The form and content of the document has been set out to enable periodic modificaitons in view of relevant legislative or regulatory changes imposed by the Environment Agency or alterations due to procedural changes.

The Management Plan has been written in accordance with the guidance detailed in “How to comply with your Environemntal Permit” v6.0 June 2013, as produced by the Environment Agency.

Old Ferry Wharf Ltd operates its own Environmental Management System (EMS) to ISO 14001:2004 (unaccredited) standard for its sites with Work Instructions (WI’s) derived from Risk Assessments for all its activities and equipment. A summary of the EMS and policy can be found in document EES/336366/B4/03.

The site activities will be managed and operated in accordance with this management plan and the EMS. It identifies procedures with the aim of minimising the risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of a complaint. All Management Plans for the site operations will be reviewed at least annually. Any modifications to this document will be agreed, where required, in writing with the EA and in accordance with the permit conditions.

2 Site Description

2.1 Location and Setting

The site is owned by William Foster and Sons (Barrow Haven) Ltd and operated by Old Ferry Wharf Ltd, occupying an area of approximately 2ha.

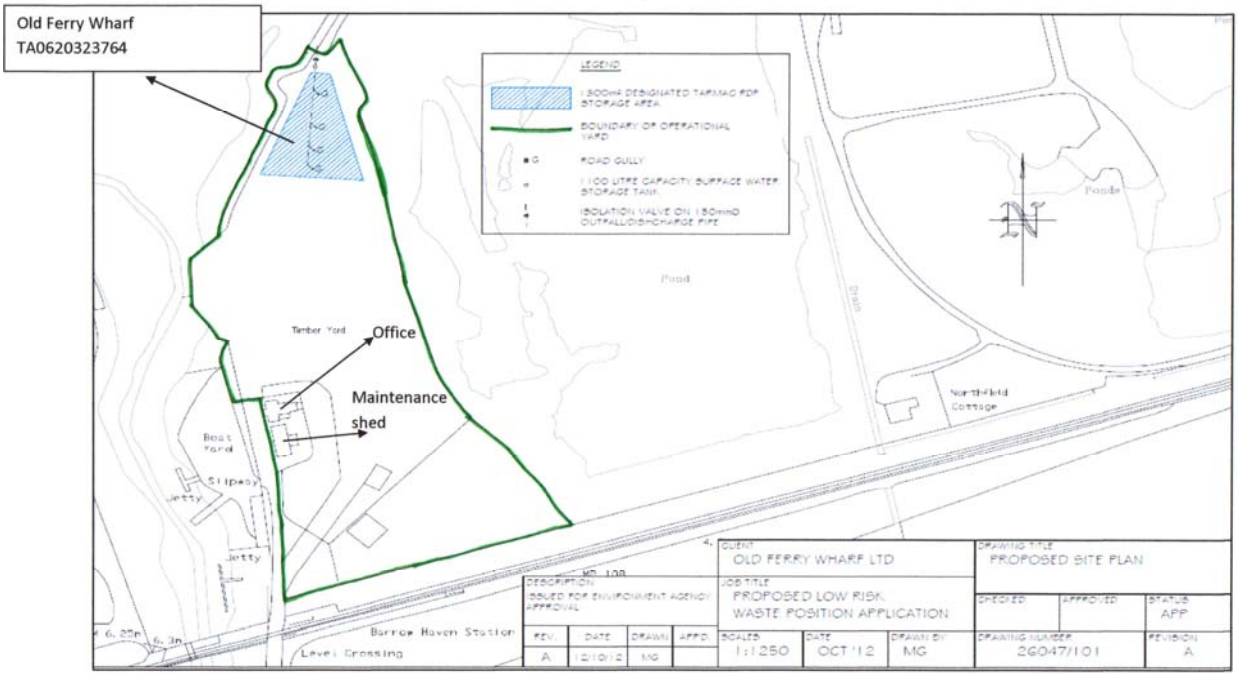
The site is situated off Ferry Road in Barrow Haven, North Lincolnshire, DN19 7ET and is centred on NGR TA 06203 23764. Old Ferry Wharf is located on land adjacent to the confluence of The Beck and the River Humber, north of the village of Barrow Haven.

The northern half of the site comprises an impermeable concrete storage area. The southern half comprises a combination of a number of buildings, some of which are surrounded by a small wooded area, and further hard standing area, which is used for storage of commercial goods. A car park is located at the south west corner of the site adjacent to the site office. To the east is a small area of grassland. The site has a public right of way and footpath running through it, which must be kept clear and accessible at all times. The footpath runs from the entrance of the site to the south, between the SRF storage compound and the jetty and up to the north of the site.

A 1,300m^2 flat, concrete storage area is located at the northern perimeter of the site and includes an integrated drainage system that outputs to a 1,100L leachate/rainwater storage tank situated to the north of the storage area. The storage area is surrounded at the north, west and east sides by a screen constructed from interlocking concrete blocks. This is the area proposed for the storage of SRF.

A flat surfaced concrete jetty is located at the western perimeter of the site.

Figure 2.1: Site Plan



Source: Old Ferry Wharf Ltd, April 2014

2.2 Development History

The site has been an industrial site involved in tile and brick manufacturing since the early 1900's until 1968.

Planning Permission was granted to William Foster and Sons (Barrow Haven) Ltd on 8th December 1977 to replace an existing wooden jetty with a concrete jetty for leisure and recreational pursuits. On 5th June 1980, Wm. Foster & Sons (Barrow Haven) Ltd. were awarded planning permission to operate as a trans-shipment storage area for importing and exporting commercial goods via the concrete jetty. The site has been operated by subsidiary Old Ferry Wharf Ltd since 1986.

On 12th March 2012 North Lincolnshire Council confirmed in a letter to Old Ferry Wharf Ltd that Old Ferry Wharf Ltd did not need any further permission to undertake storage of SRF at the site. A copy of the Planning Permission dated 5th June 1980 and the letter have been submitted with the Environmental Permit Application Forms.

2.3 Access

The site is accessed from Ferry Road, which is located approximately 4 miles from the nearest main road, the A15 from the Humber Bridge to M180. Access to the Humber Estuary is via the wharf adjacent to the site and located on a tributary approximately 200 metres upstream of the river.

2.4 Site Design

The site has been designed for the storage and exportation of goods including baled SRF delivered to the site by waste management company, Neales Waste Management Ltd. The handling and storage of SRF will be in accordance with the specific requirements of Environmental Legislation. In addition, the basic requirements of Planning Permission and Health and Safety Legislation have all been included in the site design. The site infrastructure is maintained to continue to meet these requirements.

The access road to the site and the extent of the site is predominantly hard surfaced. All designated vehicle routes are hard surfaced as is the SRF storage area.

3 Operations

This section outlines the operations permitted to be carried out at the site. The following management plans specify the activities the permit allows to be carried out.

3.1 Site Activities

Old Ferry Wharf Ltd currently handles bulk commodities in bags, in a baled form or on pallets. These commodities can include steel sections and coils, bricks, tiles, timber and finished goods both for import and export trades. In addition to these commodities, the wharf and its 1ha storage yard are used for forwarding and distributing Baltic timber products. The movement of these commodities does not need to be subject to the Environmental Permitting Regulations 2010 (as amended), as these materials are not wastes.

As discussed in Section 1.1 the site was originally operated under Low Risk Waste Position LRW431 receiving Refuse Derived Fuel (RDF) for export from October 2012 to October 2013. This was later replaced with Regulatory Position Statement (RPS) 128 “Short term storage of RDF at a dockside”. However, as the site is 500m of a SSSI, Ramsar site or European site it could not meet the terms of the RPS and an Environmental Permit application is required.

3.1.1 Permitted Activities

The permit will cover the storage of Solid Recovered Fuel (SRF), categorised as non-hazardous waste, prior to export only. No other waste management activity will take place under this permit. This document does not identify any permitted or non-permitted activities that the site operator may decide to undertake in the future.

The site will only accept waste-derived fuel as described in Table 3.1.

Table 3.1: Site specified accepted waste

Waste Codes	Processes	Notes	Standards Permits / European standards
19 12 10 combustible waste (waste derived Fuel)	Transfer – Export	SRF Fuels - fluff	CEN/TC 343 SR2008no1
19 12 12 other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11*	Transfer - Export	SRF Fuels – more dust	CEN/TC 343 SR2008no1

(NB - Where 19 12 11* is other wastes (including mixtures of materials) from mechanical treatment of waste containing dangerous substances – hazardous wastes will not be permitted. The input Waste Codes can be found in Appendix D).

SRF will be delivered to site in bales weighing approximately 750kg on an intermittent basis. Each bale will be cross-wrapped 6-7 times. The number of times that each bale is wrapped corresponds to the number of times that it is handled. The wrapping will consist of 35µm plastic film, which is UV stable and designed to accommodate the seasonal conditions. The waste will be baled to 1.1m x 1.2m x 0.75m in size using a power baler and held together using nylon strapping prior to being wrapped. All baling is undertaken at a site operated by Neales Waste Management Ltd at Clayton Hall, Blackburn, which is where the SRF will be derived.

SRF bales will be unloaded in a designated area and stored for a 7-21 day period, allowing for contingency plans, before transfer to the jetty and export via ship. The SRF storage area has a capacity of 4,999 tonnes and the site will accept no more than 30,000 tonnes of SRF per annum. A wall has been constructed from interlocking concrete blocks (Legio Blocks®) at the perimeter of the storage area to contain the bales whilst on site. Bale storage will not exceed the height of the storage area walls or 5m, whichever is lower.

SRF bales will typically be stockpiled until there is sufficient material to be transported. A single shipment will transport approximately 3,000 tonnes. Shipments will also be organised if material has been stored for 21 days.

3.2 Hours of Operation

The permitted hours at the site are:-

06.30 – 19.30hrs or sunset, whichever is the later, 7 days per week including bank holidays.

The site shall maintain adequate lighting to ensure that it is safe to work in the site during hours of diminished light darkness.

3.3 Site Office

The site office, located adjacent to the site access, is equipped with telephone, water and foul drainage to a septic tank. Welfare facilities for the site staff are integral to the site office. The site office contains the site diary, first aid kit, spill kit absorbent material and other records as described further in Section 5.

3.4 Site Management

Certificates of technical competence for the site managers are included in Appendix A.

Other personnel will include site operatives (the number will be dependent on the activities being undertaken). Full details of job descriptions including individual duties, experience and qualifications can be obtained from Old Ferry Wharf Ltd.

All personnel will be trained in the appropriate handling procedures. Suitable PPE will be provided to staff and visitors on site.

All personnel will have access to a copy of the Environmental Permit and Management Plans and will be trained where necessary in regards to these documents.

Whenever the site receives or exports SRF or other affiliated materials, or activities are being carried out with a risk of causing pollution, the site shall be supervised by at least one member of staff who is suitably trained and fully conversant with the requirements of the permit and procedures.

3.5 Operational Procedures

The site operational procedures are included as Appendix B. Flow diagrams providing representations of the waste acceptance and exportation procedures are included as Appendix C. A brief description of the waste acceptance procedures are included below.

3.5.1 Waste Acceptance, Inspection and Validation

All deliveries to site must be reported to the site office on arrival. The delivery driver is required to supply a completed waste transfer note at the site office and an operator is required to log the waste delivery and any incidents or non-conformances related to the delivery or waste. The driver is required to sign Old Ferry Wharf Ltd documentation pertaining to the acceptance of the waste at the site. All waste material received onto site is recorded electronically and manual waste receipt tickets are generated. The receipt ticket information will include:

- Waste Type (EWC Code);
- Waste Producer;
- Vehicle type and registration;
- Waste carriers registration;
- Waste container size;
- Load weight; and
- Time and date.

An inspection of the waste, in accordance with the documentation provided, will be conducted to ensure that the incoming SRF conforms to the permitted waste type as stated in the Environmental Permit. Waste should be identified according to its nature and the EWC of the waste will be recorded.

Any waste not conforming to the Environmental Permit will be rejected immediately and the driver will not be permitted to unload the rejected materials. The type and size of receptacle will be noted and Neales Waste Management Ltd will be informed. If the incoming waste load exceeds the storage capacity available on site or individual containers of waste accepted are over-loaded, the waste exceeding the storage limit will be rejected. If any malodourous loads arrive at the site, these will also be rejected.

All baling is undertaken at Neales Waste Management Ltd site. If a layer is ripped or split Old Ferry Wharf Ltd will attempt to repair using industrial tape, if it is not possible to repair Neales Waste Management Ltd will be informed and it will be sent back for re-wrapping or repair.

3.5.2 Waste Unloading

On acceptance of the waste, the delivery driver is directed to a designated area for waste unloading. The waste unloading areas are designated to avoid cross-contamination of SRF batches. Whilst unloading, the waste should be inspected for non-conformances such as split bales, liquids and odours. If non-conformances are found, the bales will be removed from site immediately or relocated to a quarantine area until it can be safely removed. Neales Waste Management Ltd will be informed. Any leaking bales will be rejected and removed from site by the incoming vehicle. The maximum interval for non-conforming waste to remain at site is 7 days, not including public holidays or weekends.

During the process of waste acceptance and unloading, if there are any spillages of waste, they will be dealt with immediately and placed in appropriate containers.

Once the load has been deposited, the vehicle is to proceed back to the Office to be logged out. Before leaving the site, vehicles will be checked by the driver for debris or mud on lorry bed or tyres and that curtain sides are securely fastened.

Terms and conditions of entry for incoming waste vehicles can be found in **Error! Reference source not found.**B.

3.5.3 Non-conformance reporting

Neales Waste Management Ltd will be notified either immediately or before the end of each working day in relation to wastes rejected from site or the removal of non-permitted waste containers. Any incidents of this nature will be recorded with details of the waste type, weight, non-conformances and any other required information in the site diary. A written record will be forwarded to the Environment Agency by means of the quarterly waste return.

The maximum quantity of non-permitted waste held on-site at any one time shall not exceed 4.6 cubic metres. If it appears that there is a danger that this will be exceeded then Neales Waste Management Ltd will be informed and required to collect the quarantined wastes.

3.5.4 Exporting waste

Neales Waste Management Ltd arrange for the baled wastes, stored at Old Ferry Wharf to be collected and transported. Old Ferry Wharf Ltd will inform Neales Waste Management Ltd that a shipment is required. This will typically be either when the stockpile of SRF approaches 3,000 tonnes or removal is required as the 21 day storage limit is approaching.

The SRF bales will be moved to the concrete jetty in conjunction with the arrival of the transport boat using the on-site mobile plant. The bales will be loaded onto the ship using the dock-side crane.

The site operative shall note the date, time, vehicle, waste type and location on a waste removal record (Transfrontier Shipment note). This sheet will then be passed to the Site Manager to allow the appropriate records to be made. The waste removal sheets shall be retained on-site for a minimum of two years.

All loads leaving site must be baled securely. The bales will be prepared such that they meet the requirements for Transfrontier Shipment to ensure the load is safe and legal for entry into another country. When loading, unloading or moving waste, the site operative must ensure that if any dust or litter is produced it stays within the site boundary. Should it appear that this is not the case, the loading of the boat shall cease.

Before any loading of bales onto ships is conducted a copy of the recipients' record consistent with the duty of care requirements needs to be provided to a site operative.

3.5.5 Plant and equipment

Plant will be used to unload and load SRF to and from the storage area. A forklift truck with bale clamps will be used to unload and load incoming or outgoing SRF vehicles. A dockside crane is used for the loading of SRF bale onto ships. Plant will be operated by trained competent operators.

Any liquid fuel, kept on site, will be stored in appropriately designed tanks. The site stores red diesel stored in a mobile bunded tank, which is kept within the maintenance shed. Spill kits are also located here.

3.6 Personnel, Training and Technical Competence Management Plan

The Personnel, Training and Technical Competence Management Plan relates to the technical competence and training of all staff employed on the site.

The Site Manager is responsible for ensuring that all staff are aware of their role on site, and for informing them of the potential impacts that could be caused if their role is undertaken incorrectly and for arranging for training to be provided as required.

3.6.1 Training provided

Staff training is an essential part of the EMS and all site staff will undergo a training programme appropriate for their job including training on existing activities and any new activities. All training undertaken will be documented. All new employees will be fully inducted and will also undertake an appropriate training programme.

The training requirements for each employee at the site will be identified and inexperienced workers will be trained, coached and supervised closely by a qualified and experienced individual until considered competent for the task.

Training can be achieved through tool box talks with the staff on some activities at the site, also reviewing risk assessments and safe working procedures are part of this training. Information on work instructions and risk assessments are located at the site office.

The training will include:

- Site Induction;
- Work Instructions;
- Health and Safety;
- Information relating to the permit and its management plans; and
- Any other specific training to enable the employee to do their job.

All staff will receive awareness training relating to the EMS during their initial induction. This training will include:

- An overview of the EMS including the requirements of ISO 14001;
- How the EMS addresses these requirements;
- How the system interacts with other management/operational systems;
- Responsibilities within the EMS; and
- Content and role of the Environmental Policy.

All staff will also receive job specific training at departmental level. This will include:

- Key environmental aspects and impacts associated with their specific job function
  - how fulfilment of the role contributes to wider environmental issues,
  - how the role is managed by the EMS, and
  - the importance of individual's performance in achieving control;
- Objectives and targets that have been set
  - the importance of these objectives and
  - how an individual's performance can help these be achieved;
- Individual roles and responsibilities in achieving conformance with the Environmental Policy and Procedures and with the requirements of the EMS, including:
  - emergency preparedness and response requirements, and
  - how to prevent and mitigate the environmental impacts associated with accidents and emergencies;
- Relevant environmental legislation
  - how compliance is to be achieved and monitored.

Personnel performing tasks, with the potential to cause significant environmental impacts, will be competent for such tasks on the basis of appropriate education, training and/or experience. Training and training needs analysis will be undertaken in accordance with the Training Procedure in order to ensure that all personnel have the required skills and knowledge to perform their individual roles within the EMS. This will include specialist skills requirements and internal EMS auditing.

Training records will be maintained for each member of staff and held by the Training Manager.

Old Ferry Wharf Ltd is committed to Health and Safety and all employees have extensive H&S training. Health and Safety information will be communicated to operators by management through training and written and verbal instructions.

All personnel who drive mobile plant will be trained and will receive certification specific to the relevant type of plant.

Site personnel will be trained to report and take remedial action on any faults or failures in equipment.

3.6.2 Competence and Training

Training needs with respect to awareness of, and compliance with, new or emerging legislation, as well as the arrangement of refresher training will be identified and discussed with senior management and arranged with relevant staff as considered necessary. The technically competent manager or other nominated individual will be required to have a Certificate of Technical Competence (CoTC) Level 4 or equivalent qualification. This qualification is relative to the level of risk of activities that are undertaken on the site. The Site Manager or other qualified personnel will be contactable during all operational hours or they will have made alternative arrangements for short periods when they might not be contactable. Certificates of WAMITAB qualified personnel are available in Appendix A.

There is a requirement for all CoTC and WAMITAB qualified personnel to undergo a test every two years to ensure they are still technically competent to manage the site. This is typically organised through WAMITAB. If this is not completed or is failed, then the person will no longer be qualified to manage the site. The Environment Agency could close the site, prosecute the site operator and/or force the site operator to get CoTC cover from a third party with the relevant qualification. A change in technical competence management on the site needs to be reported to the Environment Agency.

3.7 Site Security

Site security measures are installed to limit the potential for vandalism that could lead to environmental pollution or damage to site, plant or other equipment. The site has a public right of way and footpath running through it, which must be kept clear and accessible at all times. The footpath runs from the entrance of the site to the south, between the SRF storage compound and the jetty and up to the north of the site.

The security of the site shall be maintained as follows:

- The SRF storage compound shall be enclosed by interlocking walls and lockable gates;
- The SRF storage compound walls and fencing shall be no less than 2 metres high;
- The SRF storage compound boundary will be maintained in such a way as to deter unauthorised access;

- The gates will be kept closed and locked outside permitted hours of operation of the site, unless under emergency conditions; and
- The gates will be kept closed and locked when the compound is unstaffed.

There will always be a Manager on call to deal with any situation arising. To assist with reporting any incident, the Manager's contact details and all necessary emergency contact numbers will be clearly stated, along with the site permit number, on an external site identification board erected at the site entrance.

3.8 Notice and Signs

A site identification board will be located at the site entrance. The sign will detail the name of the site, address and telephone number of the operator, emergency contact numbers, the hours of operations and the address and contact telephone numbers of the Environment Agency.

The sign will be maintained in a satisfactory condition at all times.

A notice board will be maintained in the site office. A copy of the Environmental Permit and a copy of the company's Health and Safety and Environmental Policies will be displayed, together with other relevant notices.

3.9 Fire Management Plan

3.9.1 Fire Prevention and Management

The Fire Prevention and Management Plan relates to the management and control of fires throughout the site. Fire management needs to be considered to ensure that the risk to human health and to the environment is minimised.

The Site Manager will be responsible for ensuring that procedures are followed, but all site operatives will need to be aware of their responsibilities in relation to fire. It will be the responsibility of the Site Manager to ensure that all staff has undertaken the basic training in the use of fire extinguishers. The procedure for dealing with a fire incident will be displayed both in the site office and the yard.

Adequate precautions will be taken to prevent the outbreak of fires at the site, which typically tend to start from an outside source rather than by spontaneous combustion, or as a result of a discarded cigarette. Any waste that is alight or smouldering should, therefore, be observed by the site operatives during checks at the reception. Smoking is prohibited on site and all staff will be advised of this requirement.

Should incoming waste be noted to be alight then site operatives will assess the extent of the fire and will determine the appropriate action to be undertaken. Any fire within the permitted area and elsewhere on the site will be treated as an emergency. Should it not be readily easy to extinguish the fire, then the Fire Service will be contacted immediately. Having contacted the Fire Service, the Environment Agency will be

informed. Where the Fire Service has been called, the site shall be closed initially and will only re-open with the approval of the Environment Agency and/or Fire Service.

Fire detection is visual and an alarm call will be raised in the event of a fire. All site staff will receive training on the emergency procedure for fire.

The Site Manager will report any incidences of fire in the daily inspection log or site diary and will inform the Environment Agency, the site owner and any other required bodies as soon as practicable of any incident even where the Fire Service is not required.

Fire extinguishers are provided on-site and clearly signed in accordance with Fire Regulations.

Any fire on site will be treated as an emergency and extinguished at the earliest opportunity using the following procedure:-

- Raise the alarm.
- Evacuate employees to a safe area and prevent any further access to the site. It will be the Site Manager's role to ensure that everybody has left the site and to prevent any further access to the site.
- Attempt to control the fire using the appropriate appliances at the site if trained to do so. If this attempt fails, contact the Fire Service on 999.
- Following contact with the Fire Service, inform the Environment Agency.
- Report the situation to the Fire Service on their arrival.
- Prevent anyone from entering the site until authorised by the Fire Service.
- Once the fire has been extinguished, seek the advice of the Fire Service on future precautionary action.
- Reasonable effort must be made to ensure that no contaminated site drainage reaches any surface watercourse, surface water drain or unsurfaced ground.

Inform head office and the Environment Agency of the incident and record all details. Arrange for the removal and replacement of any fire-damaged equipment or plant.

3.10 Accident Management Plan

The potential for accident and emergency situations has been identified during the identification and evaluation of environmental aspects of the company's operations.

Those situations where there is a potential for accidents and emergency situations that could have environmental impacts associated with them are listed on the Emergency Response Register located at site. Environmental impacts associated with the identified situations will be prevented and mitigated by implementation of the site specific accident management plan, which can be found in document EES/336366/B4/04. Specific emergency procedures outlined for oil spillages, operator accidents and fire are appended in Appendix E.

In addition, Old Ferry Wharf Ltd has a number of risk assessments in place for each individual hazard identified at the site. These will be updated, as appropriate, in conjunction with the proposed changes to

the site operations. An Environmental Risk Assessment has been produced for the site as appended in EES/336366/B2/04. This highlights potential risks and mitigation of risks including accidents and incidents.

The Site Manager will be responsible for reporting any incidents internally and to interested parties, such as the HSE and Environment Agency if an incident should occur. Incidents occurring will be recorded on the daily inspection log and site diary. The Environment Agency and other relevant authorities will be informed of any accidents occurring on site, as required under Health and Safety legislation.

Emergency plans and procedures will be reviewed and revised at least annually, and sooner in the event of major changes to operational practice or where an incident has occurred. Where practicable, emergency procedures will be tested periodically (i.e. at least once a year) to check their efficiency and to provide training to personnel.

3.11 Complaints Management Plan

All complaints received relating to any aspect of the site and its activities will be recorded and acted upon. Complaints, and actions taken, will be recorded on a complaints form and in the site diary, when required. If a site receives a complaint, a complaint form should be completed, filed and available for review by the Environment Agency when they next inspect the site. The forms will be used as evidence that any complaints received have been taken seriously, that actions have been taken to rectify any problems identified and that ongoing themes to the complaints are highlighted and resolved.

All complaints will be investigated promptly and appropriate remedial action will be identified and undertaken, where practicable. The complainant and potentially others that may have been affected will be informed of any actions undertaken and/or required. The details of the complaint and the actions taken will be recorded.

3.11.1 Complaints Investigation Procedure

In the event of any complaint, this section deals with the complaint assessment procedures. The primary role of this assessment will be to ascertain whether the complaint is associated with any site operations and what action should be taken to prevent or minimise the probability of a recurrence.

3.11.1.1 Step 1 – Complaints received

The site operator or Environment Agency receives a complaint regarding the Old Ferry Wharf site.

3.11.1.2 Step 2 – How to Respond

Investigation - The primary reasons for investigation of complaints will be to identify the likely cause and source for the complaint and it is important to gather as much information about the complaint.

If required, the Site Manager will carry out an effective appraisal of the complaint by subjective assessment and note any results and actions on a complaints form.

3.11.1.3 Step 3 – Determine what to record and how

The complaint details and the investigation outcomes and actions taken are to be recorded in accordance with the requirements on the complaints form. This information will be filled in on site at the time of notification of the complaint.

3.11.1.4 Step 4 – Follow-up investigation

In order to resolve any problems successfully, it is essential to fully understand the source, reason and the operational conditions that led to the complaint. The first step in the investigation will be to select the most appropriate methodology for assessment.

All the information collected should be filled in on complaints form and a note made referencing this in the site diary if appropriate. The Site Manager at Old Ferry Wharf Ltd will be responsible for collecting all the information and providing feedback to the complainant where necessary.

3.11.2 Specific actions taken in event of a complaint

Actions taken in the event of a complaint regarding various site issues or activities will be dealt with as follows:

- If a complaint is made with respect to pests or vermin, where normal treatment measures appear to be unsuccessful, the Site Manager will investigate whether any of the activities at the site could be the source of the nuisance. The Site Manager will discuss and agree any further measures required with Old Ferry Wharf Ltd's management team.
- If a complaint is made with respect to litter the Site Manager will arrange for litter pickers to clear up as appropriate and will assess whether further control measures will be required to ensure that the risk of recurrence is minimised. The details of the complaint will be recorded in the site diary and any other reporting as part of the EMS will be conducted.
- If a complaint is made with respect to noise or vibration the Site Manager will assess the cause of the complaint and will report the findings to the Old Ferry Wharf Ltd's management team. If the noise or vibration leading to the complaint has been caused by a continuing operation additional noise or vibration surveys may be required to confirm the degree of impact upon the receptor. The Site Manager will make any recommendations for further noise or vibration control to the Old Ferry Wharf management team where appropriate and shall inform the Environment Agency of the complaint as soon as it is practicable to do so.
- In the unlikely event that a complaint is made with respect to odour the Site Manager will investigate the source of the odour and take steps to reduce its impact. The Site Manager will inform the relevant authorities. If the source appears to come from the site then appropriate actions to reduce the odour will be taken.

- If a complaint is made with respect to fugitive releases, the Site Manager will arrange for appropriate remedial action to be taken such as sweeping or wash down of hard standing. The Site Manager will assess whether further control measures will be required to ensure that the risk of recurrence is minimised. The details of the complaint will be recorded in the site diary and any other reporting as part of the EMS will be conducted.

4 Emissions and Monitoring

4.1 Emissions

4.1.1 Site Surface and Foul Water Infrastructure

4.1.1.1 Surface Water drainage

Surface water from the SRF storage area is diverted to a 1,100L contained underground storage tank. The tank level is monitored on a daily basis to ensure the prevention of fugitive emissions to the environment. The tank is operated at between 3-10% of its maximum volume. If this is exceeded, or when required, the tank will be emptied and cleaned and the water transported off-site for appropriate treatment.

4.1.1.2 Foul Water drainage

Foul water from the toilet block is connected to a septic tank. The septic tank is monitored on a regular basis to establish cleaning requirements. When cleaning is required, a competent contractor will be contacted to provide this service. This is not part of the permitted activity.

4.1.1.3 Maintenance

The surface water and foul drainage systems will be maintained to the required standard. Routine cleaning of the drainage systems will take place, as a minimum, every twelve months. A visual inspection of the hard standing and drainage system will be undertaken following a shipment of SRF.

4.1.2 Groundwater Protection

All vehicle manoeuvring areas and storage areas are located on an impermeable hard standing, thus preventing any spillages from entering the sub strata and groundwater system.

4.2 Fugitive Release Management Plan

On a daily basis the Site Manager will ensure that a site inspection is undertaken and an inspection form completed. This will cover inspection for all fugitive releases and the potential for fugitive releases. Any recommendations from the inspection will be actioned within the following operational week.

4.2.1 Mud

In the event of mud being carried onto immediate access road off-site or surfaces on-site, the Site Manager or the office staff must be informed immediately. An on-site sweeper will be employed as soon as possible, to ensure that the highway is kept mud free. If the sweeper is unavailable, surface cleaning operations and wheel cleaning operations of outgoing vehicles will be undertaken using a hose and brush.

Under no circumstances must vehicles leave the yard with significant mud on their wheels; carrying mud on the highway is an offence under highway legislation and is a breach of the permit conditions.

Incidents of mud arising will be recorded in the incident book or site diary. If the problem persists, a review of the problem will be conducted and remedial action will be taken to prevent the release of mud onto the public highway.

4.2.2 Dust

There is a small likelihood of dust generation at the site. In the event of problems arising due to excessive dust arising at the site operatives will report immediately to the Site Manager or site office. In the majority of potential cases of dust arising, the dust will be swept by the on-site sweeper, collected and disposed of in the appropriate manner.

Incidents of dust arising are to be noted in the site diary and incident logs. If the problem persists, a review of the problem will be conducted and remedial action will be taken to prevent the release of dust.

4.2.3 Litter

Measures will be implemented and maintained throughout the operational life of the site to prevent the escape of litter from the confines of the site.

The integrity of the site boundary will be maintained in such a way as to minimise the production of litter. The site gates shall remain closed at all times other than when opened for any purpose in relation to the Waste Management activity.

At the end of each working day the site will be tidied by the operatives to minimise the opportunity for the production of litter. A daily litter inspection and, when necessary, collection will be carried out to ensure that the impact of litter is minimised.

If litter becomes a problem, further investigation into the cause of the litter and any required mitigation to prevent or reduce its impact will be undertaken.

4.3 Odour Management Plan

This section is a summary of the odour management plan which can be found in document EES/336366/B4/02.

The Site Manager and other staff should maintain awareness of the potential for odours to occur. The Site Manager will ensure that a daily inspection is undertaken around the site boundary to check for odours and an inspection form completed. Any recommendations from the inspection are to be actioned, as soon as practicable, or at least within the following operational week.

In the event of odour becoming a problem, site personnel are required to inform the Site Manager or office as soon as possible. The source of the odour will be investigated by designated site personnel.

As permitted wastes will be securely contained as bales, it is unlikely that odour will emit from the storage of the bales. In the event of odorous waste delivery to site, the waste will be rejected.

All incidents of odour are to be noted in the site diary and incident log.

4.4 Noise and Vibration Plan

4.4.1 Noise and Vibration management

Efforts to minimise noise will be considered at all stages of operation. A subjective risk assessment has been conducted identifying what the likely sources for significant noise and vibration emanating from the site during normal operations will predominantly be linked to the movement of vehicles to and from the site and the operation of plant on site. The site has been operated as Old Ferry Wharf Ltd since 1986, and incoming and outgoing vehicles and similar plant have been operating at the site throughout this period.

Operational experience highlights that there have been no previous complaints of noise at the site. The site operations will not change, other than the potential increase of incoming vehicles and frequency of operation of plant on-site within the normal operating hours. The frequency of incoming ships per year at the site is limited by the planning consent and will not increase above this.

The risk of noise pollution due to vehicle movement will be reduced by the implementation of a speed limit on site general traffic. Noise and vibration of plant will be maintained within the manufacturer's designed limits by correct use of equipment, the use of the site Preventative Maintenance Management Programme and the provision of anti-vibration equipment on fixed plant.

Monitoring will be considered if there is a change of operational procedures such as alternative plant and equipment or should a new noise sensitive receptor arise within the vicinity of the site. Noise levels are currently effectively controlled through the limitation of working hours during operations of between 07.30 and 17.30 hours or sunset, whichever is the later.

If a complaint is made with respect to noise or vibration, the Site Manager will investigate the possible cause of the complaint and will report all justified incidents to the Environment Agency. As a minimum, all plant and machinery will be checked and the source of the noise identified so that the necessary remedial action can be taken.

The details of the complaint and actions taken will be recorded in the Site Diary. If the noise or vibration leading to the complaint has been caused by a continuing operation, additional noise or vibration surveys may be required to confirm the degree of impact upon the receptor.

4.5 Planned Preventative Maintenance Programme Management Plan

4.5.1 Maintenance and maintenance schedules of plant and machinery

The site's infrastructure and processing plant will be maintained in accordance to their design and any manufacturing warranties applicable. This will be achieved through the use of maintenance schedules for all plant items.

Vehicles and plant will have regular preventative maintenance checks. Basic checks will be carried out by the plant operators on a daily basis. Any defects will be reported to the Site Manager or office immediately. Servicing of plant and vehicles shall also occur on a frequent basis. Servicing shall occur at intervals of 300 hours or 2 months, whichever is reached first, or in accordance with any manufacturers' recommendations or warranties.

Any defects recorded will be passed onto the Site Manager who will make arrangements for the necessary repairs to be undertaken. Routine maintenance such as greasing, cleaning, oil top ups etc. will be carried out by site staff.

Operators will be trained to alert site management/supervisors to any malfunctions and, where possible, repairs will be carried out by trained personnel as per the equipment instruction manuals for the equipment. Trained specialists will be brought in, if required.

4.5.2 Infrastructure maintenance

All impermeable surfacing and hard-standing will be kept clean and tidy. Mud will be removed from all concrete or tarmac areas in order to prevent any spreading onto the public highway or the generation of dust. During icy conditions, operational areas used by vehicles will be treated with a suitable de-icing material or grit to maintain safe working surfaces. Surface deterioration will be repaired at the earliest opportunity to prevent it becoming a hazard to site movement or to the environment.

Concrete walls will be checked on a daily basis for any deterioration and will be repaired at the earliest opportunity.

Signage will be maintained in a clean and readable condition at all times and steps will be taken to ensure it is not obscured.

All maintenance or breakdowns will be recorded in the site diary.

4.6 Non-conformance Plan

Non-conformances with the requirements of the Environmental Permit or EMS may be identified as a result of:

- Internal audits

- External audits
- Complaints
- Observation
- Incidents

Should a non-conformance be identified as a result of one of the above activities, it will be investigated, action taken to mitigate any impacts caused and corrective and preventive action taken. Any corrective and preventive action taken to eliminate the causes of a non-conformance will be appropriate to the magnitude of the problem and commensurate with the environmental impact.

4.7 Pest Management Plan

The Site Manager will undertake a daily inspection of stored wastes for pest infestations. Any infestations shall be noted in the site diary and suitable treatment shall be undertaken. Vermin will be managed by the use of suitable bait placed securely around the site perimeter, subject to using the guidance provided by the HSE and Environment Agency on such matters. The use of bait will be recorded in the site diary.

Waste will be treated off-site prior to baling for insect infestation, by spraying the waste. In addition, the light fraction material of which SRF is made is shredded at high speed and passes directly to a baler where it is compacted under several hundred tons of force then immediately wrapped and transported for storage within 24 hours. The lack of moisture, organic material and oxygen inhibits even microbial life let alone flies. In addition, the nature of the baled material is not considered attractive to pests or vermin, therefore, pest infestations within the waste is unlikely.

The Site Manager will undertake daily monitoring for the stored wastes likely to attract scavengers and shall take appropriate action should scavengers be noted. Any waste attracting scavengers will be isolated, secured and removed from site at the first available opportunity. Any such incidence will be recorded in the site diary.

5 Records

5.1 Site Records

All records which are required to be made under the specified condition in Section 4 of the Environmental Permit will be maintained and kept secure from loss, damage or deterioration, and will be kept in accordance with the requirements specified in Table 5.1 below.

All records that are required to be made under the conditions of the permit will be kept in a suitable and available place for immediate inspection, if necessary, by an authorised officer of the Environment Agency.

Table 5.1: Standards for keeping of site records

Site records	Specified standards
SRF accepted at the site; SRF rejected SRF despatched from the site; Site diaries	1. All records shall be stored either: ▪ on paper in a secure cabinet or cupboard; or ▪ computer disc with a back-up copy. 2. Records shall be kept for a minimum of two years.

A record will be kept of each load of SRF accepted and each load of SRF removed or transferred from the site. This record will include the following details:

- A summary record of the waste types and quantities accepted and removed from the site (including waste transfer activities) will be made for each quarter of the financial year and will be submitted to the Environment Agency within 1 month following the end of that quarter. The summary record will be in the format agreed, in writing, with the Environment Agency.
- A site diary will be kept secure and will be available for inspection at the site when required by an authorised officer of the Environment Agency. This will, in accordance with the other conditions of the permit, include a record of the following events:
  - construction work;
  - start and finish of daily on-site waste management activities;
  - maintenance;
  - breakdowns;
  - emergencies;
  - problems with received waste(s), with action(s) taken;
  - site inspections and consequent actions carried out by the operator;
  - technically competent management attendance on site;
  - despatch of records to the Environment Agency;
  - severe weather conditions;
  - complaints about site operations, with actions taken; and
  - environmental problems, with any remedial actions.

Ideally records should be kept for six years to ensure there is sufficient information to enable the Environment Agency to carry out relevant periodic audits and reviews (usually once every 4 years) under the relevant regulatory regimes. The records that will be kept are those relating to environmental protection and those required under the permit. Internal and administrative records will not be kept for longer than the statutory times frames unless it is in relation to an incident on site. Each record will be completed within 24 hours of the relevant event.

5.1.1 Reporting and notifications

The Site Manager will notify the Environment Agency of:

- Any malfunction, breakdown or failure of equipment or techniques, accident or emission of substance not controlled by an emission limit which has caused or may cause pollution;
- A breach of a limit specified in the permit; and
- Any significant or adverse environmental and health effects which includes harm to any sensitive receptors and impacts on property as well as employees.

5.1.2 Security and availability of records

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

5.1.3 Maintenance and records

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

- the name of the Site Manager;
- details of all visitors, including status and times of arrival and departure;
- details of maintenance, modification, repair, replacement, delivery and return, and breakdown of any plant and machinery;
- arrival and leaving time of the CoTC, if not the Site Manager;
- weather conditions;
- details of inspections undertaken and actions taken; and
- damage to vehicles, gates etc. and incidents of trespass.

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

Appendices

Appendix A. CoTC Certificate

wamitab

Certificate No: 13186

CERTIFICATE OF TECHNICAL COMPETENCE

This Certificate confirms that

Samantha Bichard

Has demonstrated the standard of technical competence required for the management of a facility of the type set out below

Facility Type

Level 4 in Waste Management Operations -

Managing Treatment Hazardous Waste (4TMH)

Authorising Signatures:

Chief Executive Officer

Director:

Date of issue: 27 November 2013

00020253

Credit certificate

This certificate determines credit awarded to:

Samantha Bichard

Units gained:

		Credit Value	Credit Level
K6009711	Manage physical resources	3	4
M6009712	Manage the environmental impact of work activities	5	4
Y6021501	Control work activities on a waste management facility	9	3
A6021670	Manage the movement, sorting and storage of waste	7	3
K6021423	Procedural compliance	6	4
M6021424	Manage and maintain effective systems for responding to emergencies	19	4
D6021435	Control maintenance and other engineering operations	13	4
K6021504	Manage improvements to waste management operations	7	4
F6021606	Manage the reception of hazardous waste	15	4
H6021646	Manage site operations for the treatment of hazardous waste	22	4
J6021672	Manage the transfer of outputs and disposal of residues from hazardous waste treatment and recovery operations	13	4
U1051769	Monitor procedures to control risks to health and safety (Employment NTO Unit B)		

Awarded: 27/11/2013

Serial No.: 17704/MSCE8/1

Authorised

Ray Burberry
Qualifications Manager, WAMITAB

Regulated by Ofqual

For more information see http://register.ofqual.gov.uk

Llywodraeth Cymru
Welsh Government

The qualifications regulators logos on this certificate indicate that the qualification is accredited only for England, Wales and Northern Ireland.

00052600

Appendix B. OFW Operational Procedures Document

Site Procedures

‘TO PROMOTE THE DEVELOPMENT OF AN ECONOMICALLY & ENVIRONMENTALLY SUSTAINABLE WASTE RECYCLING FACILITY’

]

1.WASTE ACCEPTANCE PROCEDURE

PURPOSE: To provide definition and method to the acceptance of waste materials at **Old Ferry Wharf**

1. The permitted hours of site operation and hence waste acceptance are :
    - 07.30 – 17.00 hrs Monday to Friday
    - 07.30 – 12.00 hrs on Saturday's
2. All visitors to site must
    - report to office;
    - with incoming loads to ensure that they have the correct paper work; and
    - report any incidents, Waste Non-compliance
3. All waste delivered to be inspected on arrival
4. Any load not conforming to the permitted waste types as stated in the site licence document shall be rejected immediately.
5. Refer to permitted waste types D1- or copy in Office
6. Waste should be identified according to its nature , Ewc and be noted
7. The waste producer and type and size of receptacle should be noted
8. The driver is then directed to the appropriate Unloading area, Whilst Unloading the waste should be inspected for un-conformed waste.
9. Any Split bales found upon Unloading to be quarantined in the quarantine skip.
10. Ensure full PPE is being worn, dependent on the nature of the waste
11. Any leaking Bales to be rejected
12. Any spillage of waste to be dealt with immediately and placed in the appropriate containers. In the event of spillage of oil, contain the spillage with spill dry medium then to be place in the appropriate container.
13. Once the load has been deposited the vehicle is to proceed back to the Office to be logged out.

2.WASTE UNLOADING PROCEDURES

PURPOSE: TO PROVIDE DEFINITION AND METHORD TO THE UNLOADING OF SRF MATERIALS AT **OLD FERRY WHARF.**

1. Please ensure drivers with incoming loads report to the office for paperwork completion and reporting of any waste non-compliance etc.

2. Waste accepted to the site shall be unloaded in accordance to the type and mixture of waste within the correct number receipt area.

3. Ensure full PPE is being worn, dependant of the nature of the waste

4. SRF baled material shall be unloaded and stored in the storage bay awaiting export

5. The load once Unloaded, shall again be inspected to ensure that there is no split bales present.

6. Where the waste is found to contain split Bales not permitted by the site licence D1 the whole load shall be removed from the site or to a designated 'Quarantined waste' container.

7. Follow the **3. Managing non-permitted waste types procedure.**

8. Any spillage of waste to be picked up and placed in the appropriate container, in the event of an oil spillage, contain the spillage, use spill-dry and place oil contaminated medium into appropriate container.

9. Any incidents, accident, plant malfunction to be reported and appropriate action undertaken and logged in the site diary.

10. Ensure that there is sufficient capacity on site to accept the SRF bales

11. Ensure Containers /Bays are emptied regularly, and there will not be any lack of suitable storage

12. Ensure there is no cross-contamination of Batch wastes.

13. The waste brought to site shall be managed in accordance with the site plan**.**

3.MANAGING NON-PERMITTED WASTE TYPES PROCEDURE

PURPOSE: TO PROVIDE DEFINITION AND METHORD TO THE MANAGEMENT OF UN-PERMITTED WASTE TYPE AT **OLD FERRY WHARF**

1. Any split baled materials are classed as non-permitted, shall be removed from the site. where this is not possible , the whole load shall be moved to a designated 'Quarantined waste' container,

2. The maximum period of time that un acceptable waste may remain in the non-permitted container is seven days. the day the waste is deposited at the site shall be included as one of these seven days. Saturdays Sundays and public Holidays are not included.

3. The Agency shall be notified before the end of the working day on which the waste is rejected from the site or removed to the non-permitted waste container.

4. A written record shall be kept of every such incident.

5. The written record shall contain the details in procedure **1. WASTE ACCEPTANCE PROCEDURE**

6. The written record should be completed upon removal from the OLD FERRY WHARF SITE of the Rejected waste.

7. A copy of the written record shall be forward to the Environment Agency

8. The maximum quantity of non-permitted waste held on-site at any one time shall not exceed 4.6 cubic metres

4. THIRD PARTY & DRIVER RULES

PURPOSE : TO PROVIDE DEFINITION AND METHOD TO THE THIRD PARTY & DRIVER RULES **OLD FERRY WHARF**

1. All drivers and third party tipping to be issued with Terms and conditions of tipping and also tipping safety Guidance when first enter on site.
2. All drivers/ third party must report to the Office, ensure the paper work is complete
3. Site Management will then direct drivers to appropriate storage containers/bay/area
4. Ensure the Necessary PPE is being worn dependent on the type of waste being handled
5. Report any incidents , accidents , rogue materials found in waste.
6. Follow designated vehicle route, and maximum speed limit.
7. Ensure waste is loaded or unloaded safely, any spillage to be cleared up
8. Containers not to be over loaded, report to site management if your load exceeds the available storage capacity of each individual container of waste
9. Upon leaving the site, ensure your vehicle is safe and legal for carriage on the highway, i.e.

    - No debris on skip lorry bed
    - No debris in the vehicle tyres
    - No Loose chains
    - No Mud being carried out onto the highway.

OLD FERRY WHARF

Terms and Conditions
Conditions of Entry for Tipping

1. These conditions supersede any previous conditions of entry published by the Company and constitute the only conditions upon which the Company will grant to the Customer and its Agents the right to enter the site for the purpose of tipping waste.

2. All drivers and personnel of the customer or its agents shall report to the site office / weighbridge on arrival at the site.

3. All drivers and personnel of the customer or its agent shall hand in a completed Transfer Note and shall sign the appropriate Company documentation before proceeding to the tipping area for the purpose of tipping waste.

4. All drivers and personnel of the Customer or its agents shall be under the direction of the site personnel and shall comply with their reasonable orders at all times provided that such compliance shall not relieve the customer of any of its duties or obligations set out in these conditions.

5. It is the responsibility of the driver of vehicles delivering waste to satisfy themselves that access to the tipping area is in a suitable condition for the vehicles. The Company gives no warranty that access is in a suitable position and accordingly will be under no liability in respect of any damage caused to delivery vehicles or any losses resulting from such damage or any losses whatsoever due to the condition of the access to the tipping area.

6. The Company reserves the right to impose a charge payable by the customer for removing any delivery vehicle of the customer or its agent from the site.

7. The customer and its agents personnel and vehicles shall at no time stray from the access roads when on site and shall follow all signs and use all wheel cleaning facilities. All drivers and personnel of the customer or its agents shall comply with the health and safety rules of the Company when on site. In particular in relation to the provision and use of personal protective equipment. Failure to do so may result in drivers and others being banned from the site.

8. All waste delivered to the site shall become the property of the Company on being deposited on the ground (and shall be dealt with by the Company in accordance with the terms of its site licence) provided that this condition shall not absolve the Customer from any liability or any responsibility under any local or government legislation or regulations.

9. The Customer shall not tip or attempt to tip waste which may contravene the terms of the Company's site licence, copies of which are available at the site.

10. Payment of the price shall be due and payable within 30 days from the date of the invoice unless the Company exercises its opinion to demand payment in advance. The Company reserves the right at any time to recover additional amounts of landfill tax plus interest from the customer should it be determined by Customs and Excise that the amount invoiced to the customer for such tax is insufficient.

11. The customer shall indemnify the Company against injury, demands, actions, costs, charges, expenses, loss, damage or liability to any persons or property arising from the act or omission of the customer or any agents or employees of the customer.

12. The Company excludes all liability for any loss or damage to any property belonging to the customer or its agent (including personal effects) or deposited by the customer or its agents (including personal effects) or deposited by the customer or its agents to the drivers and personnel of the customer or its agents on

5. SEGREGATION OF WASTE MATERIALS

Purpose: to provide definition and method to the segregation of waste materials at **OLD FERRY WHARF**

1. All baled SRF shall be stored in batch order.
2. The height at which waste is stored on-site prior to removal shall not exceed the height of the bayed area or 5m whichever the higher.
3. Wastes are not to spill from or exceed the capacity of the designated storage areas.

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6..RECORD KEEPING

PURPOSE: TO PROVIDE THE DEFINATION AND METHOD OF KEEPING OF RECORDS RELATING TO WASTE MATERIALS RECIEVED AT AND DISCHARGE FROM **OLD FERRY WHARF**

1. In line with PROCEDURE 1., all waste material received onto site shall be recorded electronically . Manual waste receipt tickets are to be generated.
2. The details of the waste type, waste producer, vehicle, receptacle size, time and date of waste receipt shall be noted on each receipt.
3. A copy of the waste receipt shall be retained on-site for a period of no-less than two years.
4. A listing of loads being removed from site and the destination of the waste, time, date and vehicle shall be noted on incoming & outgoing record
5. A copy of Incoming or outgoing record shall be retained on-site for a period of no-less than two years
6. The weights of the waste input and removal from site will be retained at OLD FERRY WHARF Head Office.
7. Weights and types of waste received and discharged from the site shall be communicated to the Environment Agency by means of the Quarterly Waste Return.
8. It is the responsibility of the Old Ferry Wharf site Manager to ensure that this return has been made to the Environment Agency.
9. Where paper copies are used, they are to be stored in a locked cupboard. Where information is held on computer, a back-up copy is to be maintained.

7.KEEPING OF THE SITE DIARY

PURPOSE: TO DEFINE THE INFORMATION REQUIRED TO BE RECORDED BY THE SITE MANAGER ON A DAILY BASIS

1. The site diary shall be completed at the end of each working day. Key events shall be noted in the diary as presented below:

    - Construction work.
    - Start and finish times of daily waste management activities on site
    - Maintenance of site infrastructure, plant and vehicles.
    - Breakdowns.
    - Emergencies
    - Non-permitted waste acceptance and actions taken.
    - Site inspections and corrective measures taken where necessary by Old Ferry Wharf
    - The attendance on-site of technically competent management – the date and times attending and leaving site.
    - The despatch of any records to the Environment Agency.
    - Severe weather conditions.
    - Complaints about site operations and actions taken.
    - Any environmental problems and remedial action taken.

8.SITE MANAGEMENT AND INFRASTRUCTURE

PURPOSE: TO PROVIDE DEFINITION AND GUIDANCE TO SITE MANAGEMENT RELATING TO SITE INFRASTRUCTURE AT **OLD FERRY WHARF.**

1. The site manager shall maintain the site office in a clean and orderly manner.

2. The site manager shall ensure that the site has adequate signage relating to:
   - The name, address and telephone number of Old Ferry Wharf together with an out of hours emergency contact number;
   - The permitted hours of operation of the site.
   - The name of the site and the site licence number;
   - The name, address and telephone number of the Environment Agency office responsible for the issuing of the site licence.

3. The site manager shall ensure that a copy of the site licence is retained on-site at all times. The site manager shall also ensure that all relevant personnel have a clear understanding of the requirements of the site licence.

4. The security of the site shall be maintained by following:
   - the site shall be enclosed by walls, fences and lockable gates;
   - The site walls and fencing shall be no less than 2 metres high;
   - The site boundary must be maintained in such a way as to deter unauthorised access;
   - The gates shall be kept closed and locked outside permitted hours of operation of the site, unless under emergency conditions;
   - The gates shall be kept closed and locked when the site is unstaffed.

5. Any liquid fuel storage tanks kept on-site shall be stored within a bunded area that is at least 110% of the volume of the fuel stored within.

6. The site shall maintain adequate lighting to ensure that it is safe to work in the site during the hours of darkness.

7. No waste is to be burned on-site. Any fires on-site will be classified as an emergency situation and the necessary actions must be taken in the event of fire. Emergency procedures for fire are presented in.

8. At the end of each working day the site shall be tidied by the operatives to minimise the opportunity for the production of litter.

9. A daily litter inspection and collection will take place in the area surrounding the site.

10. The site access and tipping area will be maintained in such a way to minimise the production of dust and mud.

11. Pest activity shall be monitored on a daily basis. Vermin will be managed by the use of suitable bait placed around the site perimeter, subject to using the guidance provided by the HSE on such matters.

12. Scavenging birds shall be discouraged by minimising the amount of and time spent on site of suitable bio-degradable waste that may attract such animals.

13. On a weekly basis the site manager will ensure that a weekly site Inspection is undertaken and form completed. Any recommendations from the weekly inspection are to be actioned within the operational week.

9.LITTER CONTROL

PURPOSE: TO DEFINE THE PROCESS FOR THE MANAGEMENT OF LITTER AT **OLD FERRY WHARF**

1. Measures shall be implemented and maintained throughout the operational life of the site to prevent the escape of litter from the confines of the site.
2. The integrity of the site boundary shall be maintained in such a way as to minimize the production of litter
3. The site gates shall remain closed at all times other than when opened for the purpose of vehicular and pedestrian access.
4. A daily litter inspection and when necessary collection shall be carried out to ensure that the impact of litter is minimised.

10.PEST & SCAVANGER CONTROL

PURPOSE: TO DEFINE THE PROCESS FOR THE CONTROL OF PESTS AND SCAVENGERS AT **OLD FERRY WHARF**

1. The Site Manager shall undertake a daily inspection of stored wastes for pest infestations. Any infestations shall be noted in the site diary and suitable treatment shall be undertaken. Vermin will be managed by the use of suitable bait placed securely around the site perimeter, subject to using the guidance provided by the HSE on such matters. The use of bait will be recorded in the site diary.

2. Site managers shall undertake daily monitoring for the stored wastes likely to attract scavengers and shall take appropriate action should scavengers be noted. any Waste attracting scavengers shall be isolated, secured and removed from site at the first available opportunity. Any such incidence shall be recorded in the site diary.

11.MUD CONTROL MEASURES

PURPOSE: TO DEFINE THE PROCESS FOR THE CONTROL OF MUD AT **OLD FERRY WHARF**

1. In the event of the treat of mud being carried onto the road , the site manager or the office staff must be informed immediately.
2. The sweeper is to be employed as soon as possible, ensure that the highway is kept mud free.
3. If the sweeper is unavailable, surface cleaning operations and wheel cleaning operations of outgoing vehicles is to be undertaken using a hose and brush.
4. Under No circumstances must vehicles leave the yard with mud on their wheels , subsequently carrying mud on the highway is an offence under the highway and waste management legislation.
5. Incidents of mud arising to be recorded in the incident book or site diary

12.DUST CONTROL MEASURES

PURPOSE : TO DEFINE THE PROCESS FOR CONTROL OF DUST AT **OLD FERRY WHARF**

1. In the event of dust considered to be a problem on site , the following actions to be instigated.
2. All site personnel to be vigilant and , if dust arising are noted from the following:
    - Dust on surface of yard;
    - Incoming dusty loads; and
    - Or any other activities on site, they must be reported immediately to the site manager or alternatively, to the office .
3. Dependent on the nature of the dust arising, the following actions will be undertaken:
    - Dust on the surface of the yard- sweeper to be used.
4. Incidents of dust arising to be noted in the site diary and incident logs

13.ODOUR CONTROL MEASURES

PURPOSE : TO DEFINE THE PROCESS FOR CONTROL OF ODOUR AT **OLD FERRY WHARF**

1. In the event of odour becoming a problem, site personnel to inform site manager /office as soon as possible.
2. The source of the odour to be determined by designated site personnel.
3. It is highly unlikely to be waste derived.
4. Under no circumstances should waste s with a known odour problem be brought on site, they must at all times be rejected from site.
5. All incidents of odour to be noted in the site diary and incident log.

14.VEHICLE AND PLANT MAINTENANCE

PURPOSE : TO PROVIDE A GUIDANCE ON THE PREVENTATIVE AND EMERGENCY MAINTENANCE SCHEDULES AT **OLD FERRY WHARF**

1. Vehicles are to have regular preventative maintenance checks. Basic checks are to be carried out by the vehicle drivers on a daily basis. Any defects are to be reported to the site manager OR Office immediately.

2. Servicing of vehicles shall also occur on a frequent basis. Vehicles shall be serviced at intervals of between 4 and 8 weeks.

3. Plant shall have regular preventative maintenance checks. Basic checks are to be carried out daily by the operative. Any defects are to be reported to the site manager immediately.

4. Servicing of plant shall occur on a frequent basis. Servicing shall occur at intervals of 300 hours or 2 months, whichever is reached first.

15. WASTE REMOVAL

PURPOSE: TO PROVIDE DEFINITION FOR THE PROCEDURE OF WASTE REMOVAL FROM **OLD FERRY WHARF**

1. Waste shall be removed from site in conjunction with the Neales Waste Head Office. The quantity of waste shall be notified to allow the most effective Crane to be supplied to lift the waste.

2. The site operative shall note the date, time, vehicle, waste type and location on waste removal (TFS) record. This sheet shall then be passed to the site manager to allow the appropriate records to be made. The Waste Removal sheets shall be retained on-site for a minimum of two years.

3. Ensure paperwork/transfer notes/ are filled in.

4. When loading any waste removal vehicle, the site operative must ensure that any dust or litter produced stays within the site boundary. Should it appear that this is not the case, the loading of the Boat shall cease.

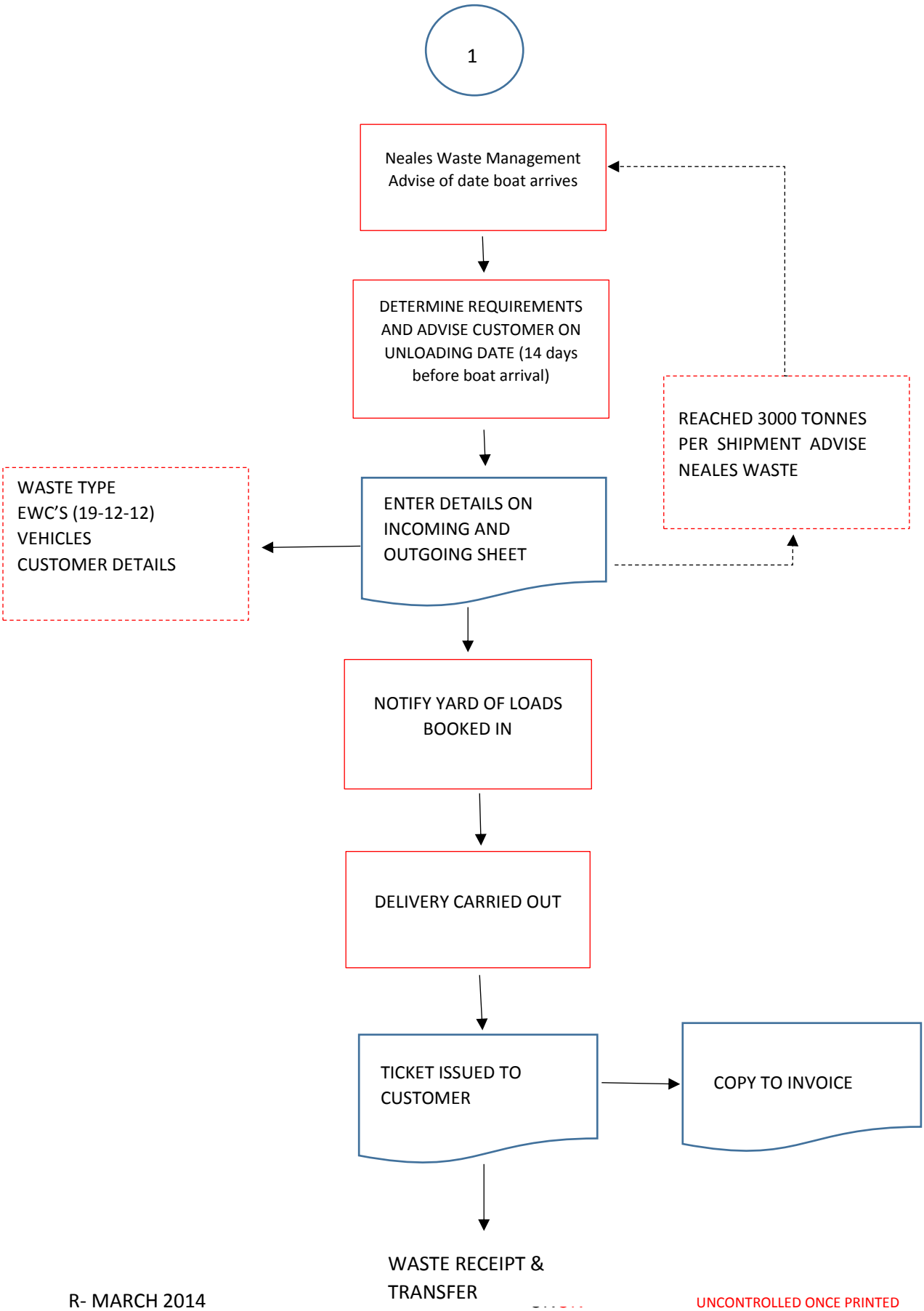
5. Before any Loading is done at the docks , we must firstly have a copy of the recipients record consistent with our duty of care requirements.

6. All loads leaving site must be baled securely ensure the load is safe and legal for entry into another country.

Appendix C. Flow Diagrams

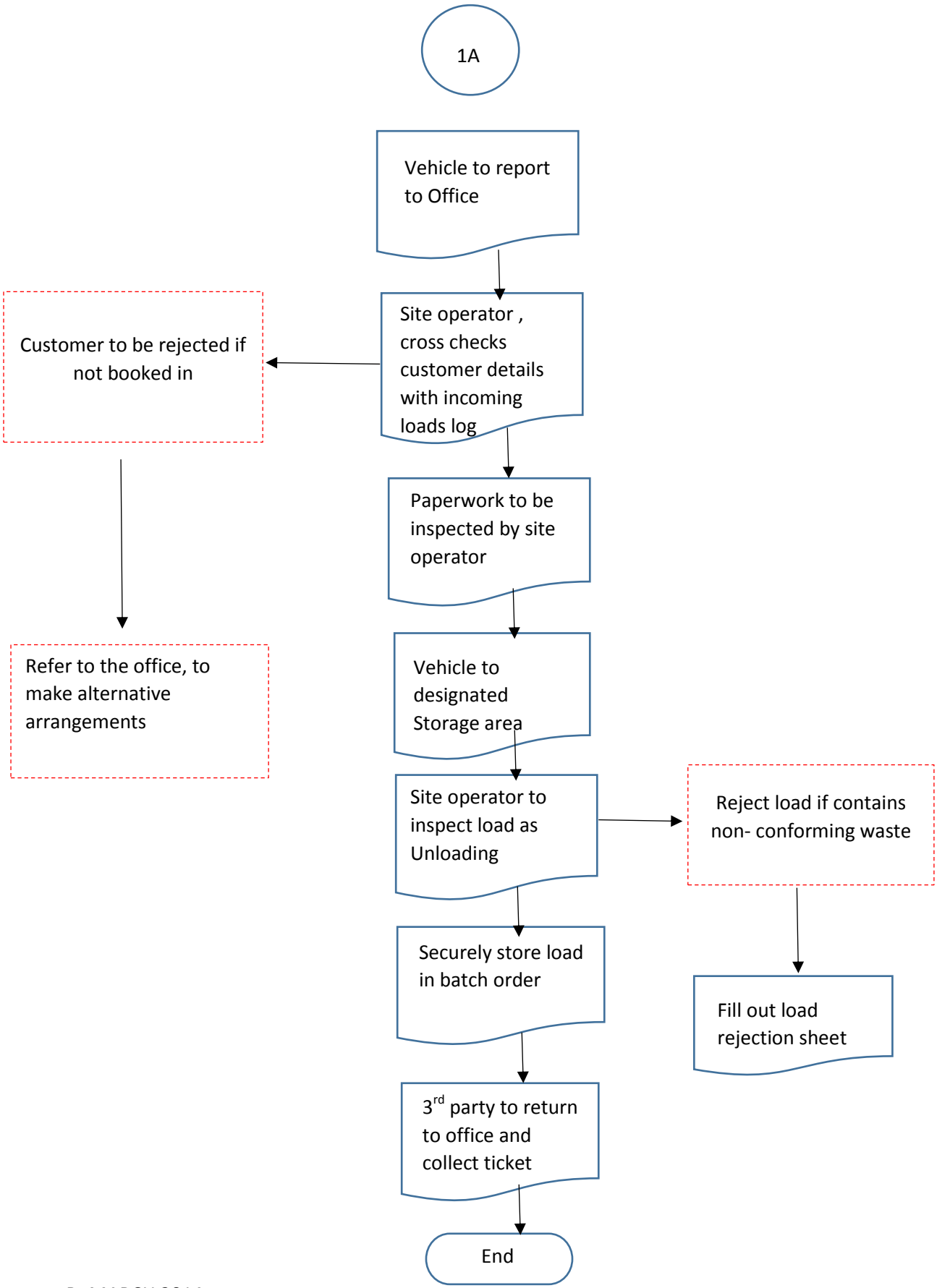
Old Ferry Wharf

Enquiry – Receipt of Ticket	IMS 2014



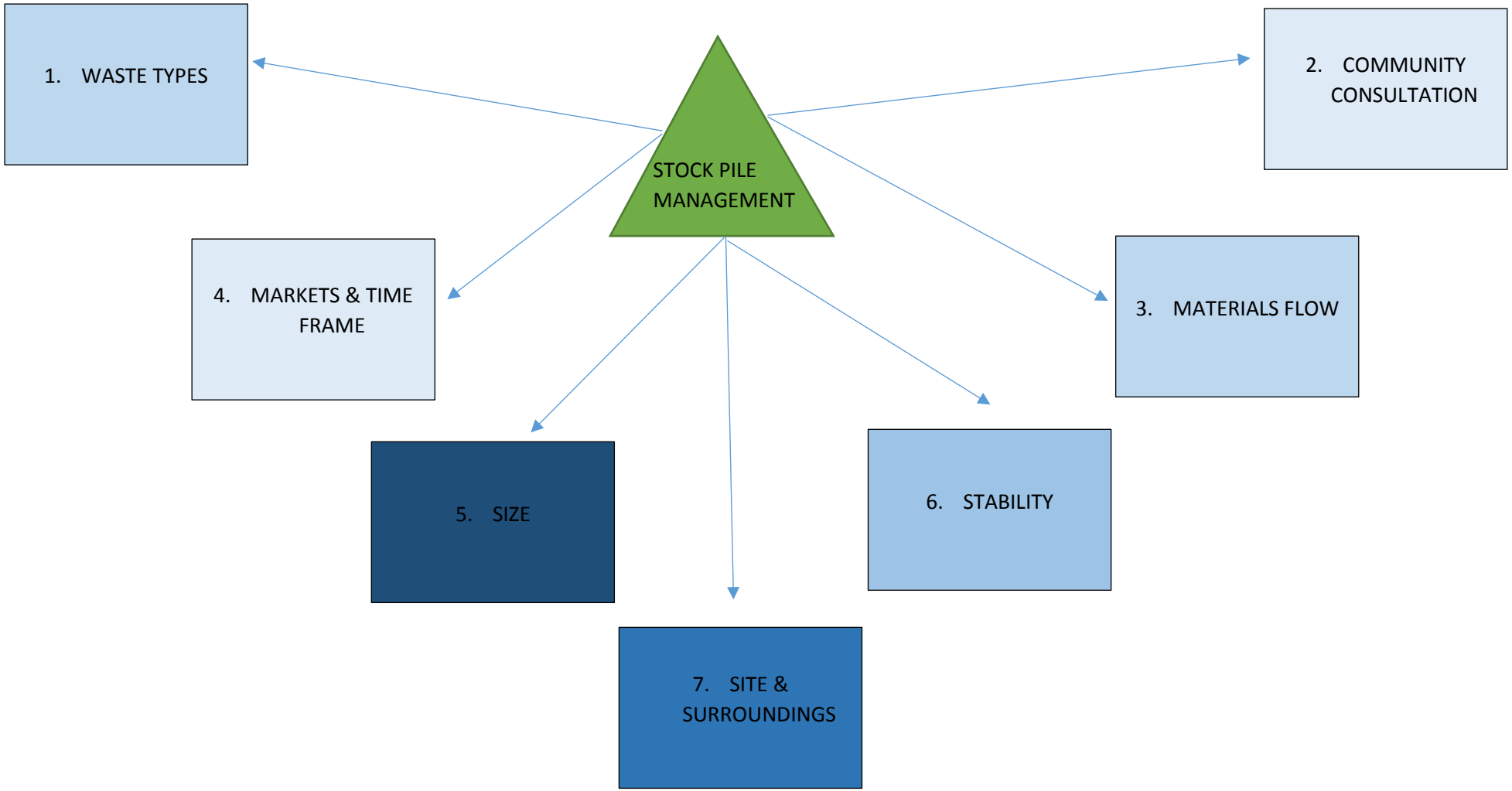
OLD FERRY WHARF

Waste Receipt & Storage	IMS 2014



Old Ferry Wharf

STOCKPILE MANAGEMENT



Appendix D. Waste Input Codes

Waste Input Codes

Doc Ref: OFW11

Bespoke Permit Application

Old Ferry Wharf

Ferry road,
Barrow Haven,
DN19 7ET
Tel: 01469 533335
Email; steve@oldferrywharf.com

Old Ferry Wharf

Waste input codes.

Old Ferry Wharf is proposing to accept SRF categorised non-hazardous wastes, to export through the dock using the storage area. Export process as outlined in the Non-Technical Summary (Doc ref: OFW01).

Wastes listed in this document are categorised using the following key:
SRF – Solid Recovered Fuel

The table has met the requirements of Section 1, Page 3 of application Form B4, specifying what input codes will be input into the different recovery/recycling operations.

Notes as to the suitability of each waste, and any conditions of their acceptance has been added to the note section of the table below.

Additional information has been added to the table in the Qualifying standard/Standard Permit section of the table which demonstrates the acceptance of those wastes being either disposed of or treated through the Standard Permits, Exemptions or European standards as listed below:

ES- CEN/TC 343

Waste Codes	Processes	Notes	Standards Permits / European standards
19 12 wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified			
19 12 10 combustible waste (waste derived Fuel)	Transfer – Export	SRF Fuels – fluff R13 D15	CEN/TC 343 SR2008no1
19 12 12 other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11	Transfer - Export	SRF Fuels – more dust R13 D15	CEN/TC 343 SR2008no1

Ferry road,
Barrow Haven,
DN19 7ET
Tel: 01469 533335
Email; steve@oldferrywharf.com

Old Ferry Wharf

Parameters	Limit
Particle size – free of metals , glass and rubble apart from de minimis amounts	Typically <40mm in any two dimensions and <5mm in a least on dimension
CV(gross dry basis) using guidance set down in BS10165	>15MJ/kg
Moisture	<20% w/w
Sulphur	<0.5% w/w
Chlorine	<0.9% w/w
Flourine , Bromine	<0.25% w/w
Iodine	<0.01% w/w
Mercury	<10mg/kg
Zinc	<500mg/kg
Silver	<20mg/kg
Cadmium	<20mg/kg
Thallium	<20mg/kg
Antimony	<100mg/kg
Arsenic	<50mg/kg
Chromium	<100mg/kg
Cobalt	<75mg/kg
Copper	<200mg/kg
Lead	<200mg/kg
Manganese	<100mg/kg
Nickel	<100mg/kg
Tin	<50mg/kg
Vanadium	<100mg/kg
Total Group III Metals	<800mg/kg

Typical SRF Specification

Ferry road,
Barrow Haven,
DN19 7ET
Tel: 01469 533335
Email; steve@oldferrywharf.com

Appendix E. Emergency Procedures

Worksheet 10

Doc Ref: OFW 1.1

EMERGENCY PROCEDURE

Old Ferry Wharf

Company Name: Old Ferry Wharf	**Document:** **Issue No:** **Date:**	**ofw 1.1** **1** **01/01/14**
Procedure Name: EMERGENCY PROCEDURES – FIRE – Old Ferry Wharf	**Page No:** **Authorised by:**	**1 of 1** **Steve Render**

Purpose: To provide definition and guidance on the action that must be taken in the event of a fire occurring at Old Ferry Wharf

Details:

1.	No waste shall be burnt on-site.
2.	In the event of fire the standard fire procedures for the site shall be followed.
3.	The emergency services must be notified immediately following the procedure as stated by the company fire policy.
4.	The Environment Agency shall be notified immediately.
5.	Reasonable effort must be made to ensure that no contaminated site drainage reaches any surface watercourse, surface water drain or unsurfaced ground.
6.	The procedure for dealing with a fire incident is displayed both in the site office and the yard.
7.	Fire extinguishers are provided on-site to allow reasonable fire control ability for most occurrences
8.	It is the responsibility of the site manager to ensure that all staff have undertaken the basic training in the use of fire extinguishers.

REFERENCE DOCUMENTS:
Environmental Protection Act 1990,Controlled Waste Regulations 1992, Thirsk License,

Emergency Procedure - Spillage

Doc Ref: OFW 1.2

EMERGENCY PROCEDURE

Old Ferry Wharf

Company Name: Old Ferry Wharf	**Document:** **Issue No:** **Date:**	**OFW 1.2** **1** **01/01/14**
Procedure Name: EMERGENCY PROCEDURES – SPILLAGES – Old Ferry Wharf	**Page No:** **Authorised by:**	**1 of 1** **Steve Render**

Purpose: To provide definition and guidance on the action that must be taken in the event of a spillage occurring at Old Ferry Wharf

Details:

1.	Should a spillage of liquid be noted, the operative is to cover the affected area with suitable absorbency material from the emergency spill kits.
2.	Upon absorption, this spillage kit or sand is to be placed in a skip and held in the quarantine area.
3.	The material, if known, shall be noted in the site diary to allow the correct disposal route to be followed.
4.	Should the material spilled not be identified then a sample shall be sent for analysis prior to correct disposal.
5.	Every effort must be made to ensure that no contaminated site drainage reaches any surface watercourse, surface water drain or unsurfaced ground.
6.	Should any spillage reach the interceptor drains on-site, this occurrence shall be immediately reported to the Office.
7.	All spillages shall be noted in the site diary.
8.	It is the responsibility of the site manager to ensure that all staff understand how to deal with a spillage.
9.	It is the responsibility of the site manager to understand the drainage layout on site.

REFERENCE DOCUMENTS:
Environmental Protection Act 1990,Controlled Waste Regulations 1992,

Accident Emergency Procedure

Doc Ref: OWF 1.3

EMERGENCY PROCEDURE

Old Ferry Wharf

Company Name: Old Ferry wharf	**Document:** **Issue No:** **Date:**	**OFW 1.3** **1** **01/01/14**
Procedure Name: EMERGENCY PROCEDURES – OPERATOR ACCIDENT – Old Ferry Wharf	**Page No:** **Authorised by:**	**1 of 1** **Steve Render**

Purpose: To provide definition and guidance on the action that must be taken in the event of an operator accident occurring at Old Ferry Wharf

Details:

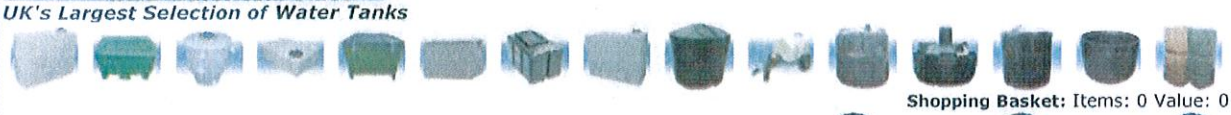
1.	Should an accident happen on-site whereby personal injury is caused to an operative, the site first aider shall make an immediate assessment of the injury, making the injured party comfortable and administer primary care with site first aid kit as required.
2.	In the event that further assistance be required, the first aider shall call the emergency services, clearly stating the nature of injury and site address as per site signs.
3.	The first aider shall stay with the injured party until relieved.
4.	Further to the incident, a full report is to be completed and sent to the Health and Safety Manager.
5.	An entry is to be made into the site diary.

REFERENCE DOCUMENTS:
Environmental Protection Act 1990,Controlled Waste Regulations 1992.

Appendix F. Specification of Sealed Drainage

Water-Tanks.net
www.water-tanks.net
UK's Largest Selection of Water Tanks

Sales: 0871 200 2082
or 01763 261 781



Shopping Basket: Items: 0 Value: 0

Back

Ecosure 1100 Litre Underground Potable Water Tanks

View large image
View Larger Image

Ecosure 1100ltr Underground Water Tank Ref: ECO1000-UNPOT

Made from industrial strength MDPE (Medium Density Polyethylene) the 1100ltr is a durable Water Tank. Ideal for both domestic and commercial use. Extremely versatile storage tank ideal for water, chemical etc. Has the ability to take from 8mm in/outlet upto 110mm in/outlet in various posistions.

Connect multiple tanks together using, upto 4" outlet pipe. Ideal out of the ground water storage tanks for industrial use.

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- Connect multiple tanks together using 4" outlet pipe.
- Neck Ring included

Water Tank Details	
Height(Without Neckring)	700mm
Height(Including Neckring)	1200mm
Diameter	1550mm
Capacity	1100 Litres
Inlet	16" Boltdown Lid
Outlet	Upto 4"

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Product Description	excl. VAT	inc. VAT
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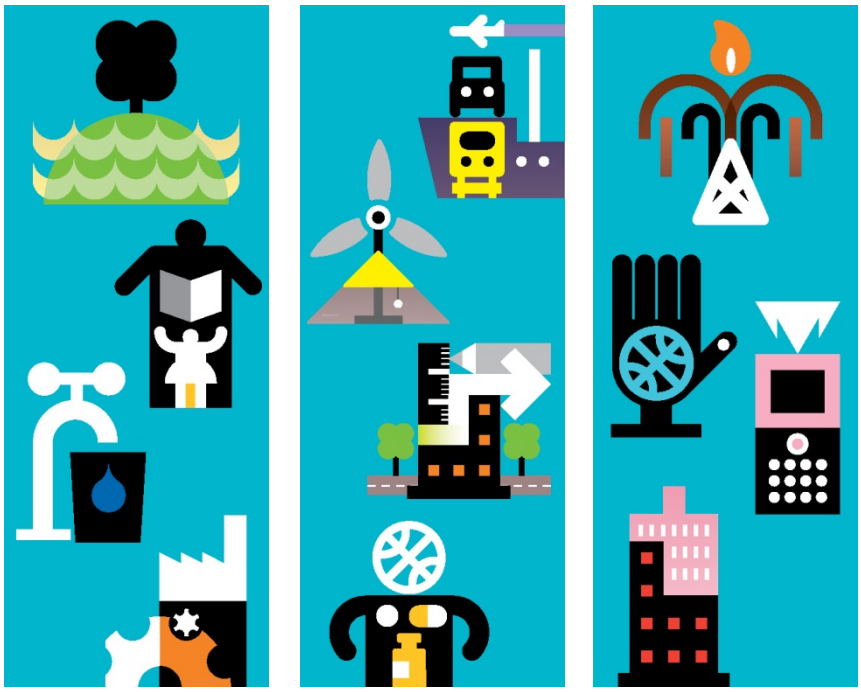

Environmental Permit for Old Ferry Wharf

Odour Management Plan - EES/336366/B4/02

April 2014

Neales Waste Management Ltd

Old Ferry Wharf

Odour Management Plan

Doc Ref: OFW05

Bespoke Permit Application

Old Ferry Wharf

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1.0 Introduction

Old Ferry Wharf has prepared an Odour Management Plan (OMP) for the waste Transfer / Export facility at Barrow upon Humber

The site recently operated under exemption, but is applying for an Environmental Permit to undertake the exporting of up to 30,000 tonnes per annum (tpa) of SRF waste using an open Storage system. Such operations will have minimal generation of odour due to the nature of material and the processes. Effective operation and management of such facilities will be required to minimise the odorous emissions from routine operations and minimise the risk of abnormal operational conditions resulting in increased risk of odour generation at the site. This Odour Management Plan (OMP) has been produced in accordance with Environment Agency (EA) guidance on OMPs1 and EPR H4 Odour Management2.
.
This OMP is aimed at assisting the operator in effectively managing potential odour releases associated with the operations at the OFW exporting facility and minimisation of the risk of abnormal operational conditions, which could result in increased risk of odour generation at the site.

1.1 Structure of Odour Management Plan

The OMP structure is in accordance with the EA guidance and considers:

- Feedstock Inventory;
- Process Management;
- Evaporation;
- Containment and abatement;
- Dispersion;
- Sensitive Receptors; and
- Incidents and Emergencies.

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1.2 Transfer / Export Operations

The facility will take in SRF materials from one main source. The streams and processes involved are briefly summarised as:

- The Storage of SRF on a sealed storage pad.

Annual tonnages of the waste stream being stored by the site are as follows:

- SRF – 30,000

The recovery of waste has the potential to generate malodours from external site operations.

This odour management plan makes an assessment of likely sources of odour generation and sets out the good site practice and mitigation that is employed to minimise where reasonably practicable any odour emitted from site.

The site is applying for a permit to Transfer / Export up to 30,000tpa of SRF waste sourced primarily from Neale's Waste Management.

The likelihood and frequency of exposure to odour arising from the facility is determined by a combination of the magnitude of release, the prevailing meteorological conditions, and the distance and direction of receptors in relation to the facility. Each of these factors are discussed in the following sections.

2.0 Feedstock Inventory

OFW have one waste Transfer operations as identified within Section 1.2. The SRF waste has the potential to produce odour if processed wrong. In order to understand the odour potential of the waste stream that enter the site, a feedstock inventory has been provided for the waste type. Table 1 below provides an assessment of waste type by source of material, identifying the typical and abnormal compositions of those waste types and providing and

Overall odour potential of that feedstock based upon the likelihood of abnormal compositions being encountered at site.

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Table 1 - Assessment of Odour Potential from Feedstock Inventory

Waste Type	Waste Source	Typical Composition	Abnormal Composition	Likelihood	Odour potential
SRF	Municipal Waste	Plastic cardboard Paper	Wet bio - degradable	Material is analysed every batch	Low – batch will be rejected before leaving Neale's waste Management

3.0 Process Management

The following section outlines the waste recovery processes operated for both the production of SRF. The monitoring parameters, critical limits, process controls and records at each stage within the recovery process for the minimisation of the production of odours are provided herein.

3.1 SRF Process

NEALES WASTE MANAGEMENT LTD TO PROVIDE INFORMATION

3.1.1 Waste Reception

On arrival, (vehicles are not weighed on Old Ferry wharf site they are weighed at Neales Waste Management on their weighbridge) vehicles called into the office to give there paperwork to the site management team and directed to the reception area where they unload into the specified area. Once offloaded, materials are inspected by site staff for split bales and any split bales that are un-repairable will be removed and placed in the quarantine skip. If more than 10% of the bales are spilt and it is believed that the load has been compromised, the vehicle containing the load will be rejected from site.

SRF => Waste Reception				
Potential Odour Issue	Monitoring	Critical Limits	Process control	Records
Delivery of SRF material , Bale split	Visual Inspection	Present	• Isolate bale from remaining bales , use tape to rectify split. • Isolate bale from remaining bales , if it is unable to be made secure place bale in quarantine skip	Load inspection sheet , weighbridge ticket.
Delivery of highly odorous bales	Visual inspection	Present	Reject load and inform Neales Waste Management	Load inspection sheet / weighbridge ticket
Baled Stock becoming odorous from storage prior to export	Visual assessment and record sheets	Feed stock delivered to site 14 days before export	Material will be removed from site via export conditions 14 days after delivery. Stock pile will be received on site via a batch system and will not exceed 3000 tonne.	Batch Sheet record

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3.1.2 Product Storage

Products are stored on the concrete storage pad following delivery ready for dispatch to the end markets. Each product batch is identifiable in its storage location by a marker that displays its unique product batch code. Each product batch contains dry sold waste from one main source and may be stored for a maximum of 14 days before dispatch to the overseas customer.

During product storage there is not a significant source of odour generation given the age of material at this point following a full drying process. However, if the bales are split moisture could enter. The process control is outlined below.

SRF => Product Storage				
Potential odour Issue	Monitoring	Critical Limits	Process control	Records
Release of odours from anaerobic product storage conditions	Visual Assessment	Odour coming from a split bale	SRF that is to be stored shall only be of material that has completed and met the critical limits for SRF. Should any visual signs of split bales be identified the bale will be removed and placed in the quarantine skip	Site diary Batch monitoring record.

3.2 Contingency Planning

Should the above process controls fail at any point within the Storage of wastes through either of the operational processes, acceptance of waste into the site will cease and the odorous material taken off site and returned to Neales Waste Management or for disposal at a suitably licensed waste management facility. Receipt of feedstock materials shall not recommence until a full review of this Odour Management Plan has been conducted and process controls amended as required.

3.3 Internal Odour Assessment and Monitoring

Old Ferry Wharf Ltd will carry out odour checks at 4 points around the perimeter of the site, on a daily basis. Findings will be recorded in the Odour Assessment Report (Annex B) or noted in the site diary. Any odours found to be present onsite will be recorded and their source investigated and steps will be taken to mitigate the sources of odours using the strategies to control odour as outlined above. The internal monitoring procedure, including a survey of odour reports will be re-assessed on a yearly basis by the Operations Manager and the Managing Director, unless the number of odour incidents warrants additional reviews.

4.0 Containment and Abatement

Given the open storage systems employed on site, there is little scope for a containment system at present time. Should there be a change to the site operational procedures, the

inclusion of containment systems will be assessed against the effectiveness of such a system and cost of installation.

A boundary spray abatement system could be installed along the perimeter of the storage pad. The efficacy of such systems will vary according to the meteorological conditions and is used as a back-up to the operational techniques to minimise odour generation as considered necessary by the operator. In addition, localised portable systems can be hired in to act under circumstances where odours are prevalent on site under abnormal operational conditions and are able to be mobilised to site within 24hrs.

The effectiveness of any abatement systems have to be assessed on a site by site basis as all sites vary in waste type, operating and processing techniques and available equipment.

As a company Old Ferry Wharf has taken the decision to deal in only SRF as RDF has a higher probability of Odour.

Any boundary sprays or other additional localised abatement and control systems will be monitored and their effectiveness evaluated in controlling and or minimising odours in order to select the most effective system for the site and its specific requirements.
At present given the absence of odour problems on site, OFW shall not be employing containment or abatement systems, but using the current process controls to minimise odour release from the site. Should there be a breakdown in the process controls then the site will review the use of such systems in line with a full review of the OMP.

5.0 Dispersion

The following section identifies the prevailing weather conditions on site, in particular the wind strength and direction in order to predict the path of likely aerial dispersion of odours generated on site.

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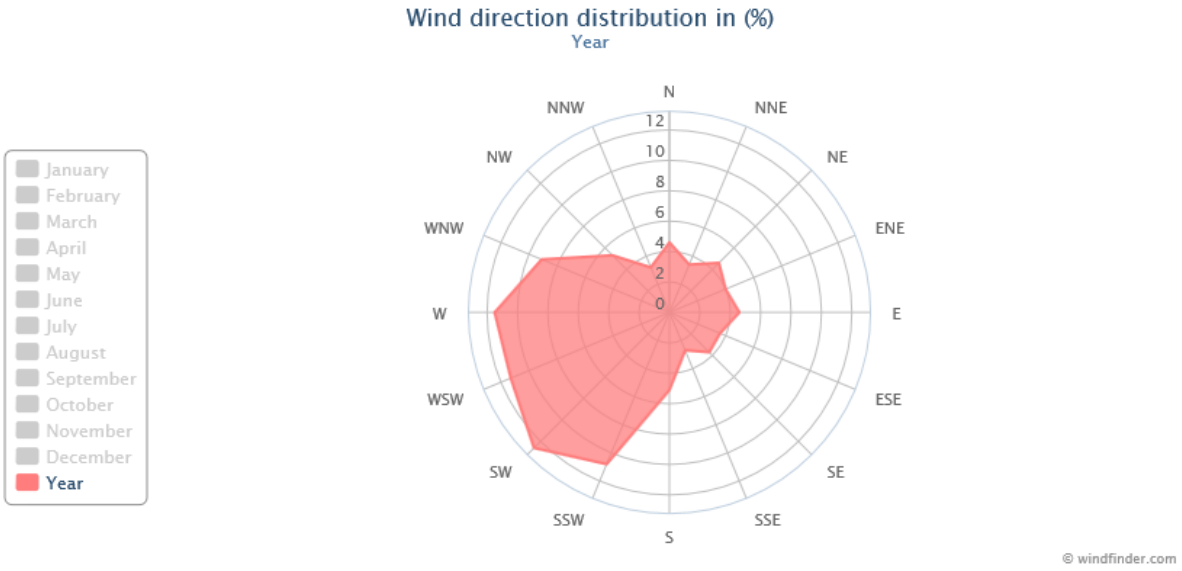
Old Ferry Wharf

Wind and weather statistics Barrow upon Humber

Statistics based on observations taken between 10/2011 - 02/2014 daily from 7am to 7pm local time. You can order the raw wind and weather data in Excel format from our historical weather data request page.

Month of year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year
	01	02	03	04	05	06	07	08	09	10	11	12	1-12
Dominant Wind dir.													
Wind probability >= 4 Beaufort (%)	32	54	33	43	56	38	35	29	43	46	36	57	41
Average Wind speed (kts)	9	12	9	10	11	10	9	8	10	11	9	13	10
Average air temp. (°C)	4	5	7	9	14	17	18	20	16	10	8	5	11



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6.0 Sensitive Receptors

The site is located within 250m of local sensitive receptors as identified from the aerial photograph of the site figure 2.

The neighbouring sensitive receptors are known to be industrial units and one has a shared access road to the wharf.

Figure 2 – Aerial photograph identifying local sensitive receptors

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An assessment of the local sensitive receptors is made in Table below, identifying the prevailing wind direction, distance to receptor and percentage occurrence of the wind direction that could potentially disperse odour towards the receptor. The key site activities and the respective distances to these operations from the operational buildings and storage area are identified in Table.

Receptor	Exposure Type	Distance from site boundary	Wind direction (from)	Occurrence (%)	Pathway description
1.			SW, SSW	12%	Aerial dispersion beyond South west boundary
2.Tile factory	Commercial and industrial		SW, SSW	12%	Aerial dispersion beyond South west boundary
3.	Residential		S, SE	6%	Aerial dispersion beyond South boundary

6.1 Dispersal Control

There are potential residential sensitive receptors lying to the south of the facility in addition to the industrial units. The site does not operate a processing activity and the management decision to only export the SRF material will maintain a no odour impact.

Any Batch that produces an odour will be removed form site as a rejected load.

6.2 Community Engagement

Old Ferry Wharf already have a good working relationship with all local sensitive receptors;. In a bid to improve the reporting lines between the sensitive receptors and Old Ferry Wharf L Ltd, the company will issue each sensitive receptor with a telephone number and address that they can use if they want to report any formal odour issues. Sensitive receptors will also be invited onto site to discuss past and future issues which may have gone unreported.

The site will display a plaque describing the site details and the contact details of the office and responsible Operations Manager. In the event of an odour occurrence, the site will leaflet drop all the immediate sensitive receptors if ANY odour incidence occurs, or is likely to occur which is attributable to the site and may impact the local community. The site will also provide the wider community with a contact point for notifying the site about potential odour incidences.

The immediate sensitive receptors within 1km of the site boundary include:

-

All complaints will be recorded and actioned in accordance to the complaints procedure. In the event of a significant odour incidence caused by the facility, a letter of apology will be sent out within a week to all affected sensitive receptors.

6.3 Responsibilities

The overall responsibility for the site shall remain with the Operations Manager. In the event of an odour incident the odour accident plan will come into force which will initially deal with the accident, the causes and consequences of the accident, and then look to mitigate any potential odour issues which may have resulted from the accident.

6.4 Procedures when Odours Arise

Old Ferry Wharf Ltd has an internal odour procedure (see Annex B) and an external complaints procedure (as outlined below and in Annex A) to ensure any odour issues are delt with quickly and effectively.

6.4.1 External Complaints Procedure

Any complaints relating to the odour of the site will be taken seriously and channelled through a senior member of staff, in this case the Operations Manager. Staff taking note of the complaint will use the appropriate Odour Complaint Form (see Annex A). Once the complaint is taken, the Operations Manager will investigate the complaint and the site activities and respond to the complainant in writing outlining any findings and actions taken to mitigate the source of odours. Any complaints, investigations and mitigating actions will be recorded in the site diary. The complaints procedure, including a survey of the complaints to date will be re-assessed by the Operations Manager and the Managing Director on a yearly basis, unless the number of complaints warrants additional reviews.

6.4.2 Response to Complaints

Receipt of an odour complaint during normal composting operations is treated as an exceedance of control levels. The primary response will be as detailed in accordance with the site's complaints procedure. An investigation shall be initiated into the cause of the complaint, this will involve as necessary:

An olfactory survey as outlined below;

- An examination of the site activities at the time of the complaint;
- An examination of the meteorological conditions at the time of the complaint; and
- A review of the effectiveness of operational and odour control procedures.

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If the complaint is validated it will be treated as an exceedance of the control level. The outcome of the investigation will determine the corrective actions to be implemented.

6.4.3 Detection of Moderate Odour

During Olfactory Survey Detection of a “distinct odour” will initiate a more extensive olfactory survey to determine the extent of the odour plume. The composting facility Manager (or Deputy) will be notified immediately and the olfactory survey will continue to attempt to determine the scope and extent of the odour plume, as follows:

- A suitable location downwind of OFW and potentially sensitive receptor at which the odour plume is unlikely to extend will be selected for assessment; □
- Survey will continue toward the Storage facility until a Waste odour is perceived; and
- Assessment points perpendicular to the plume axis and equidistant from the Storage site will then be monitored, subject to access requirements.

An investigation will be initiated into the cause of the odour. This shall involve as necessary:

- A review of the site activities at OFW and other nearby potential sources at the time of the olfactory survey;
- A review of the meteorological conditions at the time of the olfactory survey; and
- A review of the effectiveness of process operations and odour control procedures.

6.4.4 Corrective Actions

The outcome of an investigation will determine the corrective actions to be implemented, they will consider, but not be limited to:

- Alteration to waste reception procedures and odour control measures employed;
- Review of storage process monitoring results;
- Consider removal of material from site responsible for unacceptable offsite impacts;
- Consider ceasing the reception of further material from site until issue resolved; and
- Update of OMP if new procedures are created.

6.4.5 Reporting

Exceedance of the offsite odour control level will be investigated (as described above) and recorded in accordance with OFW current procedures. This includes recording the following:

- Nature of the incident;
- Date of occurrence/s;
- Results of the investigation;
- Details of responses/ action plans implemented; and
- The event will be marked within the site’s incident log.

The report will be made available to the Environment Agency upon request.

6.4.6 Review of Control Mechanisms.

A full review, taking note of all the internal odour report forms and external complaints will be made on a yearly basis, or as necessary after an odour incident in order to assess the site’s

operational procedure and odour control management plan. Findings from the review will then be incorporated into an updated plan which will replace the original OMP.

7.0 Incidents and Emergencies

In accordance with the requirements of Environment Agency's Technical Guidance Note H4, types of failure or abnormal events considered to have the potential to result in an odour impact have been considered. These have been identified as abnormal meteorological conditions and failure of aspects of the composting process during any of the process stages previously described. Failure and abnormal event scenarios with response requirements are summarised below.

7.1 Machinery Breakdown

Breakdown of shredding or turning equipment, which may result in a delay in processing the material received or turning of windrows. Magnitude of impacts will depend on the length of the breakdown, the type and volume of waste received and the prevailing meteorological conditions but could potentially result in elevated odour concentrations at receptor locations.

A - Machinery Breakdown

7.1.1 Mitigation Measure

The potential failure would be minimised through routine maintenance of equipment, servicing in accordance with manufactures guidelines, provision of adequate spares, and a service level agreements to replace plant (or source hire plant) within 48 hours.

7.2 Staff Absence

Short-term staff shortages (such as a few days illness) will not affect the ability of the site to operate effectively as other staff members can be reassigned to critical operations. Magnitude of impacts will depend on the length of the absence, the number of staff absent at any one time, and the seniority of the staff member, but could potentially result in elevated odour concentrations at receptor locations should process controls not be managed effectively.

B - Staff Absence

7.2.1 Mitigation Measure

In the event of prolonged absence of staff members, temporary staff will be recruited and appropriately trained to fulfill non critical roles whilst other more experienced staff members are

7.3 Flooding

If the site becomes flooded, this will inhibit effective storage .Widespread flooding might prevent access to site, although this is very unlikely given the close proximity of the operators to the site.

C - Flooding

7.3.1 Mitigation Measure

In a flooding situation no further waste would be able to access the site and priority would be given to ensuring the ongoing effective removal of waste already stored on the pad.

Where waste is saturated and cannot be processed due to flood waters, waste will be disposed of from site to a suitably licensed waste management facility.

7.4 Fire

Fire at a storage site cannot spontaneously occur, it could be a result of accident or mechanical failures, arson or even lightning strike. As with all fires the immediate response would be the responsibility of the Fire Brigade and odour would not be the primary concern. Once the fire has been extinguished there is likely to be a quantity of saturated waste material that could become anaerobic and odorous.

D - Fire

7.4.1 Mitigation Measure

Waste will be disposed of from site to a suitably licensed waste management facility.

Depending on the severity of the fire, site critical equipment may have been damaged and no further reception or processing of waste would be undertaken until agreed with the EA. If equipmentwill be inoperable for extended periods of time, consideration will be given to the removal of material from site until repairs are effectuated.

7.5 Site at Full Capacity

The site is will be operating below the permitted capacity on site. There is the potential that should new contracts be won for processing wastes that the site will be operating closer to full capacity which could lead to stretching of the sites resources during busy periods. The site could generate odours during this period if material is not processed as soon as is required within the process controls.

E - Site at Full Capacity

7.5.1 Mitigation Measure

The site will not accept more waste that it can store effectively at any one time and not above the permitted tonnage per annum.

In the event that the site reaches its maximum capacity, the operational manager will divert any further incoming waste from the sites to neighbouring facilities in the hull that are able to store the same types of waste until such a time when the site can resume operations within its normal operating capacity.

7.6 Odour Accident Management Plan

Procedures are in place as identified in Table 6 below for the management of odour accidents. The identified accident, potential for occurrence and anticipated consequences have been discussed. A set of actions to be taken in order to priority is presented to be carried out by the site operatives and management.

Table 6 - Odour Accident Management Plan

Accident type	Potential occurance	Consequences	Actions
Plant or Equipment failure	Accident Type Potential Occurrence Consequences Actions Seldom. Stringent preventative maintenance procedures in place to ensure all machinery remains functioning	If waste is not processed or a long period compaction n which will lead to odours once the machinery is fixed	• Inform management • Establish time frame for repairs to be undertaken • Hire or source an alternative piece of equipment. • If no replacements are available divert waste to another site. • If diversion is not available cease accepting waste • Inform the EA if necessary • Record and review the incident
Fire	Extremely rarely	Potentially	• Raise alarm on-site • Ensure personnel evacuated and accounted for from danger Area.
Contaminated water and polluting smoke	Moisture content of delivered materials and temperature profile of process restricts excessive heat generation	Polluting liquids flowing onto hard standing and leachate collection area where they will have the potential to generate odours Polluting smoke Exploding of fuel containers Wind dispersal of pollutants	• Ensure all staff are alerted • Call fire service and other emergency services as required • Inform site management • If necessary inform the EA. • Post member of staff at entrance to site to direct emergency services • Liase and follow instructions of the emergency team making them aware of any hazards on site. • Consult site register for COSHH if appropriate • Prevent fire waters causing pollution on site. • Excess water should be removed from site to prevent odours • Record and review incident.

Annex A : Form 1 – Odour Complaint Report

Date		**Ref No.**	
Name , address, and phone number of complainant			
Time and date of complainant			
Date , time and duration of offending odour.			
Weather conditions (e.g, dry, rain, fog, snow)			
Wind Strength and direction (eg, light , steady, strong, gusting)			
Complainants description of odour -what does it smell like -Intensity(use intensity scales) -Duration - Constant or intermittent			
Has the complainant have any other comments about the offending odour.			
Any other previous known complaints relating to installation(all aspects , not just odour)			
Any other relevant information			
Potential odour sources that could give rise to complaint.			
Operating conditions at the time offending odour occur			
Action taken			
Final Outcome			
Form completed by(signed)			
Intensity scale	**1. Very faint odour**	**3. Distinct odour**	**5.Very strong Odour**
0. No odour	**2. Faint Odour**	**4.Strong Odour**	**6.Extremely strong odour**

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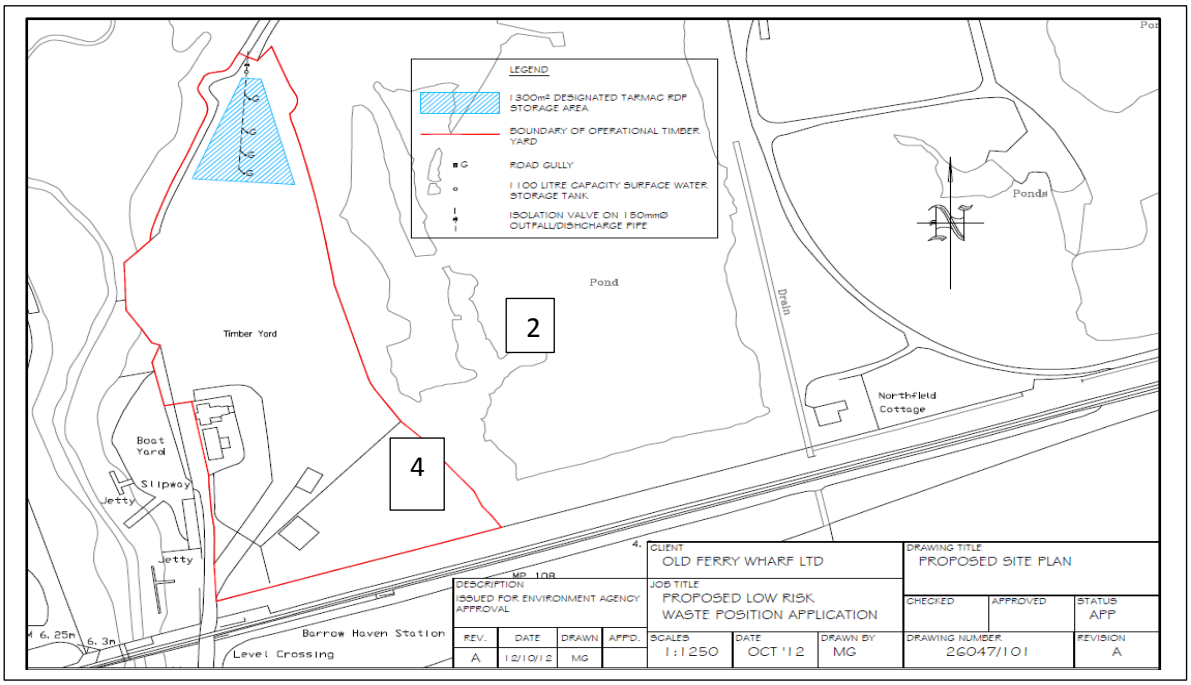
Old Ferry Wharf

Annex B: Form 2 – Odour Assessment Form

Date and Time	
Weather Conditions	
Wind Direction	
Assessor	

Location	Time		Odour				
	Start	Finish	Y/N	Intensity	Extent	description	Source
1							
2							
3							
4							

Please See map below for the odour monitoring points and the storage area



Where odour is present, classify the **Intensity** of the odour as follows:

0. No odour 1. Very faint 2. Faint odour 3. Distinct Odour 4. Very strong 5. Very strong odour 6. Extremely strong odour

Where odour is present, classify the **Extent** of the odour

I – Intermittent P- Persistent

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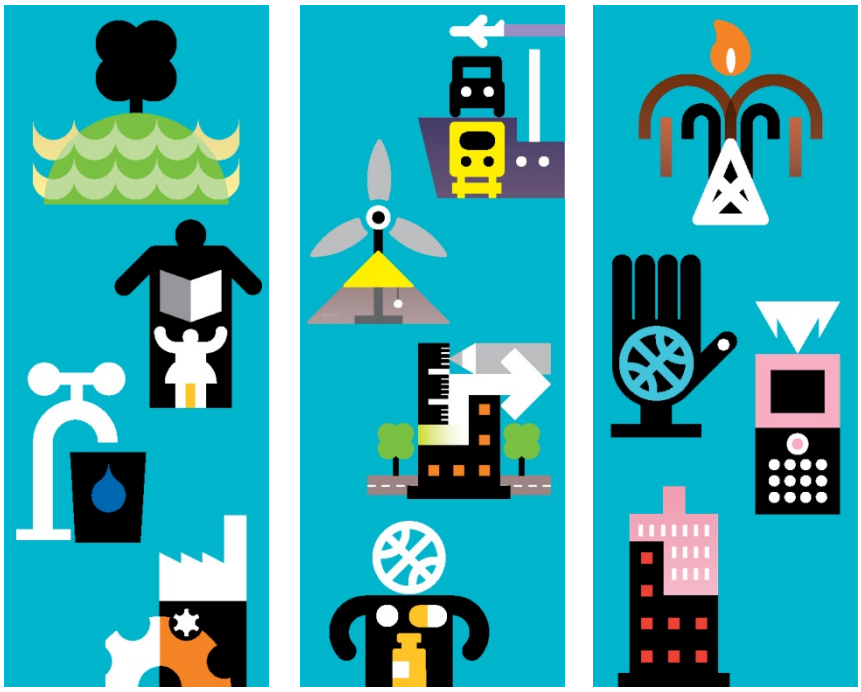

Environmental Permit for Old Ferry Wharf

Environmental Management System - EES/336366/B4/03

April 2014

Neales Waste Management Ltd

Environmental Management System Manual

Doc Ref: OFW03a

Bespoke Permit Application

Old Ferry Wharf

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Old Ferry Wharf

Contents

1 SCOPE

1.1 Introduction

This Manual provides the framework by which Old Ferry Wharf (OFW) implement and control their Environmental Management System (EMS), which has been designed to address the requirements of the international standard BS EN ISO 14001:2004. The key elements of the system include:

- an initial baseline environmental review of the company's activities (to be undertaken)
- an environmental policy statement (OFW03e)
- an assessment of environmental aspects and significant environmental impacts(to be undertaken)
- an environmental improvement programme with clearly defined objectives and targets(to be undertaken)
- clearly identified responsibilities
- adequate training of all personnel (to be undertaken)
- written procedures to control activities that have a significant environmental impact (to be undertaken)
- a system for controlling records (OFW03b)
- an audit schedule to ensure compliance with the system (OFW3d)
- periodic management review of the system

OFW acknowledge that its business processes have potential impacts on the environment that require managing in a systematic way. This system has therefore been developed in order to assess and address those impacts through a documented process, aimed at achieving regulatory compliance and continual improvement in environmental performance.

1.2 Company Profile

OFW Limited was founded in 2003 and has been operating from the site since then. The business is currently owned by Steve Render. The Board of Directors are committed to developing an effective Environmental Management System over the coming months and years.

2. REFERENCES

This Environmental Management System has been designed to comply with the requirements of BS EN ISO 14001:2004, “Environmental management systems – Specification with guidance for use”. This Manual together with ISO 14001 are the controlling documents of the EMS. In addition to ISO 14001 there are a series of supplementary standards in the ISO 14000 series, which have been referred to in the development of this system. These include:

- ISO 14004:2004,“EMS General guidelines on principals, systems and supporting techniques”
- ISO 14010:2004,“Guidelines for environmental auditing general principles”
- ISO 14011:2004,“Guidelines for environmental auditing, auditing of EMSs”
- ISO 14012:2004,“Guidelines for environmental auditing, qualification criteria for environmental auditors”
- ISO 14040:1997,“Environmental management, life cycle assessment ,principles and frameworks”
- ISO 14050:1998,“Environmental management, terms and definitions”

This manual provides the framework for the EMS and makes reference to associated documents that make up the system. Such documents include reviews, registers, schedules, procedures, forms and records and listings for such documentation can be found in the EMS Document Register (OFW03c).

3. DEFINITIONS

For the purposes of this manual the following definitions apply:

OFW:
Old Ferry Wharf

Continual improvement:
Process of enhancing the EMS to achieve improvements in overall environmental performance in line with the organisation’s environmental policy.

Environment:
Surroundings in which an organisation operates including air, water, land, natural resources, flora, fauna, humans and their interrelation

Environmental aspect:
Element of an organisation’s activities, products or services that can interact with the environment.

Environmental impact:
Any change to the environment whether adverse or beneficial, wholly or partially resulting from an organisation’s activities, products or services.

EMS:
Environmental Management System (the part of the overall management system that includes organisational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining the environmental policy.

EMS audit:
A systematic and documented verification process of objectively obtaining and evaluating evidence to determine whether an organisation’s EMS conforms to the EMS Audit criteria set by the organisation, and for communication of the results of this process to management.

Environmental objective

Overall environmental goal, arising from the environmental policy, that an organisation sets itself to achieve, and which is quantified where practicable.

Environmental performance
Measurable results of the EMS, related to the organisation's control of its environmental aspects, based on its environmental policy, objectives and targets.

Environmental policy
Statement by the organisation of its intentions and principles in relation to its overall environmental performance, which provides a framework for action and for setting of its environmental objectives and targets.

Environmental target
Detailed performance requirement, quantified where practicable, applicable to the organisation, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.

Interested party
Individual or group concerned with or affected by the environmental performance of an organisation.

Organisation
Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public or private, that has its own functions and administration.

Prevention of pollution
Use of processes, practices, materials or products that avoid, reduce or control pollution, which may include recycling, treatment, process changes, control mechanisms, efficient use of resources and material substitution.

4. ENVIRONMENTAL MANAGEMENT SYSTEM

4.1 General

OFW have established this Environmental Management System and will maintain and develop it in the future in accordance with the requirements of ISO 14001.

4.2 Environmental Policy

The senior management of OFW Ltd. have defined the company's Environmental Policy (see Environmental Policy OFW 03e) having considered the results of an Initial Environmental Review and assessment of the company's Environmental Aspects and Significant Environmental Impacts.
Senior management will ensure that the Environmental Policy:

- Is appropriate to the nature, scale and environmental impacts of its activities and products;
- Includes a commitment to continual improvement and prevention of pollution;
- Includes a commitment to comply with relevant environmental legislation and regulations, and with other requirements to which the organisation subscribes;
- Provides the framework for setting and reviewing environmental objectives and targets;
- Is documented, implemented and maintained and communicated to all employees;
- Is available to the public.

The Environmental Policy will be reviewed annually, or sooner should a change in legislation or the company's activities occur, during a Management Review Meeting.

4.3 Environmental Planning

4.3.1 Environmental Aspects

OFW have identified the Environmental Aspects (see Register of Environmental Aspects & Impacts (work to be carried out as per the implementation plan OFW03d) of the company's activities following assessment of the Initial Environmental review. This assessment will consider, where relevant:

- emissions to air
- releases to water
- waste management
- contamination of land
- use of raw materials and natural resources
- other local environmental and community issues

Consideration has been given to the Environmental Aspects and their associated impacts and they have been assessed in order to determine those that are significant and that can be controlled. These Significant Environmental Impacts will be documented in the Register of Environmental Aspects & Impacts, which details those impacts that will be managed within this EMS. OFW will ensure that the aspects related to the significant impacts are considered when setting Environmental Objectives.

The Register of Environmental Aspects & Impacts will be reviewed annually, or sooner should a change in legislation or the company's activities occur.

4.3.2 Legal and other Requirements

OFW have a number of legal and other requirements relevant to the environmental aspects of its operations. These have been identified by OFW in conjunction with external Environmental Advisors and will be documented in the Environmental Legislation Register.

The Environmental Manager, with the assistance of an external Environmental Advisor or environmental compliance service will ensure that the register remains up to date by obtaining and reviewing on a regular basis relevant reports and publications and by seeking legal advice where necessary.

4.3.3 Objectives and Targets

In order to continually improve environmental performance, OFW have set objectives and targets. Objectives are overall environmental goals that OFW have set themselves in order achieve the process of continual improvement. The objectives and targets are consistent with the Environmental Policy and include a commitment to prevention of pollution. The objectives have also been set with due consideration of:

- Identified environmental aspects and significant aspects
- Legal requirements
- Technological options including the BAT (Best Available Technique) principle
- Financial, operation and business requirements
- Views of interested parties
- Any other relevant issues

For each objective, a number of targets have been set in order to meet the objectives stated. The objective and targets will be documented in the Register of Objectives and Targets.

Objectives will be reviewed and revised annually during a Management Review Meeting. Targets will be monitored on a bi-annual basis (or more frequently if possible) and reported to the Managing Director by the Environmental Management Representatives during a bi annual Management Review. New targets and/or objectives may be set at any time if deemed desirable by the Managing Director. Objectives should be reviewed annually, and targets monthly, and included in discussion as part of usual management meetings.

4.3.4 Environmental Management Programme

In order to achieve the objectives and targets set, OFW have established programmes which are designed to address the issues considered to have significant environmental impact and to allow the process of continual improvement. The programmes are documented on the Register of Objectives and Targets.

The programmes define:

- Objectives and Targets
- The Means by which the Objectives and Targets are to be met
- Responsibility for achieving the Objectives and Targets
- Time frame for achievement

Programmes may include, where appropriate and practicable, consideration of planning, design, materials, production, marketing and disposal. For new or significantly modified processes, planning, design, construction, commissioning, operation and where appropriate, decommissioning will be considered. Programmes, together with the Objectives and Targets will be revised with respect to any new or modified processes or products by the Environmental Management Representatives and approved by the Managing Director during a Management Review Meeting. The programme will be reviewed and revised annually during a Management Review Meeting. A new programme may be set at any time if deemed desirable by the Board of Directors.

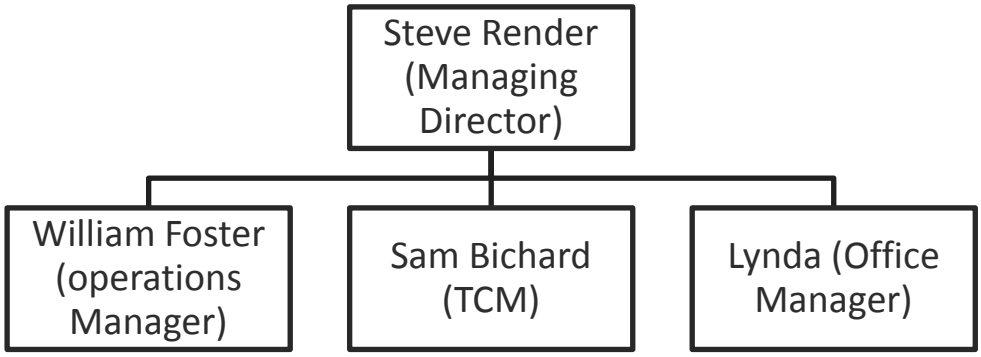
4.4 Implementation and Operation

4.4.1 Implementation Schedule

In the first year of implementing this environmental management system an implementation schedule has been produced which schedules each chapter. This will cover a review of current systems that are in place and ensure they are improved in line with this environmental manual.

4.4.2 Structure & Responsibility

OFW is committed to continual improvement of the EMS and have defined, documented and communicated roles, responsibilities and authorities in order to achieve effective environmental management. The general management structure of OFW is detailed on the Organisational Structure Chart (below).



The company is organised in such a way that the Managing Director is responsible for specific processes. However, it is a policy of OFW that the Directors may be approached regarding issues that may not be directly their responsibility, in order that quick decisions can be made and hence minimal disruption to the business process caused.

The Managing Director has overall responsibility for the EMS including for the definition of the Environmental Policy, but has deputised responsibility for its effective implementation to the Company Secretary. He shall ensure that sufficient resources (including human resources, specialised skills, technology and financial resources) are available for the effective implementation of the EMS and shall represent the EMS on the Board.

The Board have appointed an Environmental Manager, who is also the Management Representative, who irrespective of other responsibilities, have a specific role, responsibility and authority for:

1. Ensuring that environmental management system requirements are established, implemented and maintained in accordance with this manual and ISO 14001.
2. Reporting on the performance of the EMS to the Board for review and as a basis for improvement of the EMS.

In addition to the above, operational staff will have a responsibility for the EMS in their areas of responsibility, including providing adequate resources for implementing and maintaining the system on a day-to-day basis and for ensuring that performance measurement data is collected and available for review.

All staff are to comply with the requirements of the EMS, including conforming to the requirements of the Environmental Policy, Objectives, Targets and Legal and other requirements. All staff, through environmental awareness training, are expected to take an interest in environmental issues and performance and are encouraged to be involved and provide suggestions that may enhance environmental performance.

4.4.3 Training, Awareness and Competence

All staff will receive awareness training relating to the EMS during their initial induction. This training will include:

- an overview of the EMS including the requirements of ISO 14001
- how the EMS addresses these requirements
- how the system interacts with other management/operational systems
- responsibilities within the EMS

- content and role of the Environmental Policy

All staff will also receive job specific training at departmental level. This will include:

- Key environmental aspects and impacts associated with their specific job function – how they contribute to wider environmental issues, how they are managed by the EMS, and the importance of individual's performance in achieving control.
- Objectives and targets that have been set – the importance of these objectives and how an individual's performance can help these be achieved.
- Individual roles and responsibilities in achieving conformance with the Environmental Policy and Procedures and with the requirements of the EMS, including emergency preparedness and response requirements – how to prevent and mitigate the environmental impacts associated with accidents and emergencies.
- Relevant environmental legislation – how compliance is to be achieved and monitored.

Personnel performing tasks, with the potential to cause significant environmental impacts, will be competent for such tasks on the basis of appropriate education, training and/or experience. Training and training needs analyses will be undertaken in accordance with the Training Procedure in order to ensure that all personnel have the required skills and knowledge to perform their individual roles within the EMS. This will include specialist skills requirements and internal EMS auditing. Training records will be maintained for each member of staff and held by the Training Manager.

1.1.4 Communication

Internal communication with respect to environmental issues will be carried out by:

- Initial induction training
- Training seminars
- Memos/Instructions on specific issues
- Email
- Notice boards

Communication between the Board will occur at regular Board Meetings and reported on in the minutes. The Management Representative will be responsible for ensuring that any environmental information resulting from the Board Meetings is communicated to the relevant Departmental Manager for onward communication to staff. Onward communication may take the form of training seminars, short "toolbox" talks, memos, notices or other suitable means, and records will be kept. Communication from staff will be via their Departmental Managers, either in written or verbal format, which will then be passed on to the Management Representative for discussion, consideration and depending upon merit, onward transmission to the Board. In order to encourage ideas and the flow of information back up the chain, a suggestions box is available in the staff canteen. This may also be used to report transgressions from the system or potential problems. The box may be used anonymously if desired in order to encourage staff participation. External communications will include complaints, regulatory issues and requests for information. Complaints will be dealt with in accordance with Complaints Procedure, which deals with both customer and public complaints. Adequate records will be maintained. Regulatory issues will be dealt with by individual Departmental Managers with the involvement of the Environmental Manager. Requests for information from external sources will be dealt with on an individual basis and considered on merit and sensitivity of information required. A minimum of the Environmental Policy will be available to the public and copies will be posted on notice boards, included in company literature and provided on request.

4.4.5 EMS Documentation

This manual provides the framework for the EMS and describes the core elements of the management system and their interaction. Other procedures and documentation utilised by the EMS are cross-referenced from this manual. EMS Documentation includes:

- EMS Manual
- Initial Environmental Review
- Environmental Policy Statement
- Register of Environmental Aspects and Impacts
- 5 Register of Environmental Legislation
- Environmental Objectives and Targets
- Standard Operating Procedures
- Registers
- Schedules
- Plans

4.4.6 Document Control

All EMS documentation will be stored electronically on the main server, to which access is restricted. The documents will be password protected and only authorised personnel will be able to edit existing records.

The copies on the main server will be the Master Copies and controlled in accordance with the Document Control Procedure. Paper copies of EMS documentation will be made available at locations where operations essential to the effective functioning of the EMS are performed. These shall be controlled in accordance with the Document Control Procedure. Other paper copies may be made for information purposes but these shall be un-controlled and clearly labelled as such. A full listing of all documentation is provided on the Documentation Register. All EMS documentation will be reviewed at least annually, revised as necessary and approved for adequacy by authorised personnel. Changes to the system may be instigated by any member of staff through consultation with their Departmental Manager. All changes shall be reviewed by the Management Representative and authorised by a member of the Board prior to issue. All documentation shall be readily identifiable, dated, and include the current revision number. Superseded documentation will be removed from use and clearly marked as such. EMS documentation (including superseded documents) shall be kept for a minimum of 12 years.

4.4.7 Operational Control

Operational control will be applied to all activities that are associated with the identified significant environmental aspects, in line with the Environmental Policy, Objectives and Targets. Such control will be achieved by use of checklists, training, supplier assessment, sub-contractor control and documented procedures (where required). Documented procedures are required to cover situations where their absence could lead to deviations from the Environmental Policy and from the objectives and targets. A list of the procedures utilised by OFW in order to achieve operational control is provided in the Documentation Register.These procedures will be reviewed following any revision of the system in order to ensure that any changes are reflected within the overall system.

4.4.8 Emergency Preparedness and Response

The potential for accident and emergency situations has been identified during the identification and evaluation of environmental aspects of the company's operations.
Those situations where there is a potential for accidents and emergency situations that could have environmental impacts associated with them are listed on the Emergency Response Register. Environmental impacts associated with the identified situations will be prevented and mitigated by

implementation of Emergency/Accident Plans and Departmental Operational Control Procedures where relevant. Emergency Plans will be reviewed and revised at least annually, and sooner in the event of major changes to operational practice or where an incident has occurred.
Where practicable, Emergency Plans will be tested periodically (i.e. at least once a year) to check their efficiency and to provide training to affected personnel.

4.5 Checking and Corrective Action

4.5.1 Monitoring and Measurement

DER carries out monitoring and measurement of key parameters of its operations and activities that can have a significant impact on the environment.

Monitoring and/or measurement will be undertaken for issues relating to:

- Identified significant aspects
- Objectives and Targets
- Relevant operational controls
- Environmental legislation and regulations

Parameters for monitoring and measurement are detailed on the Environmental Performance Measurement Schedule, which gives details of frequency, acceptability criteria, responsibility and the output documents or records relating to each parameter.

Any equipment used for monitoring or measurement will be maintained and where necessary calibrated or verified prior to use in accordance with the OFW. Procedure for Control of Inspection, Measuring and Test Equipment. Where applicable, calibrations shall be made against standards traceable to international or national standards.

A list of all equipment used for monitoring or measurement can be found on the Calibration Register. Calibration certificates will be kept on file and the calibration status, date of calibration and date of next calibration will be clearly stated on the equipment.

The evaluation of compliance with relevant environmental legislation and regulation shall be carried out during internal EMS audits (see section 4.5.4)

4.4.2 Non-conformance and Corrective and Preventive Action

Non-conformances with the requirements of the EMS may be identified as a result of:

- Internal audits
- External audits
- Complaints
- Observation
- Incidents

Should a non-conformance be identified as a result of one of the above activities, it should be investigated, action taken to mitigate any impacts caused and corrective and preventive action taken. Any corrective and preventive action taken to eliminate the causes of a non-conformance will be appropriate to the magnitude of the problem and commensurate with the environmental impact. The process is detailed in DER document Non-conformance and Corrective and Preventive Action Procedure.

4.5.3 Records

Environmental records are those records, which demonstrate that processes are controlled and that conformity to the requirements of the EMS exists and operation of the EMS is effective.
A documented procedure is in operation for the identification, collection, indexing, access, filing, storage, maintenance and disposition of environmental records (DER document Procedure for Control of Environmental Records). Where applicable data from subcontractors will form an element of these records. All environmental records must be legible, in order that they may be reviewed at a later date if deemed necessary. All environmental records will be stored on the server, in the respective offices, or other appropriate locations so as to avoid deterioration. Records will be retained for a minimum period of 12 years.

4.5.4 Internal EMS Audit

Internal audits of the EMS will be carried out in order to determine whether or not the system conforms to the planned arrangements for environmental management and has been properly implemented and maintained. The audit schedule is based on the environmental importance of the activity concerned and shall take into consideration the results of previous audits. The audits will be carried out in accordance with the OFW Procedure Internal Audit of EMS. The audit procedure covers the scope, frequency, methodology, as well as responsibilities and requirements for conducting audits and reporting results. Internal audits will be carried out by personnel suitably trained and experienced in carrying out such audits and wherever possible by personnel who are not directly responsible for the activity being audited. Following each audit, the auditor issues a report identifying: any process performance not meeting Company requirements (out of control process) or nonconformity, which has been raised: opportunities for improvement or corrective actions, required; persons responsible for handling the issue and a date when completion is required.

Out of control processes are categorised as:

1. Major out of control situations - where processes fail to achieve the process performance standards set for them by the management team. The process should be immediately re-examined and changes made to bring the process back into control. Examination of the process will determine if all parts are being fully complied with in sequence and in a timely manner. This should be perceived as an opportunity for immediate improvement.

2. Minor out of control situations - where the process has temporarily been put at risk by discontinuity of feedback loops, missing activities, failure to produce evidence of the process being under control.

Audit non-conformities are considered resolved when the corrective actions have been successfully completed, by signing off the non-conformance form. Should audits identify a major nonconformity, or the system or part of the system has a large number of non-conformities, the auditor, or his delegate, will re-audit the areas of concern following the sign off of the non-conformance, to confirm the corrective actions have satisfactorily been cleared. Observations are also noted, but do not require signing off. Information regarding the results of audits will be reported to senior management for consideration, generally during Management Review Meetings, but sooner if the results are critical to the effective management of the system.

4.6 Management Review

Management Review Meetings are generally held during Board Meetings at regular intervals. Reviews may be carried out at longer intervals (but at least bi annually) if senior management are confident that the system is in control and that it is suitable, adequate and effective in managing the environmental issues pertinent to its operations.

Senior management will be present at Management Reviews along with the Management Representatives and any other staff that may need to have an input (on an as required basis). Information for inclusion in the reviews will be collected by the relevant Departmental Managers and forwarded to the Management Representatives for collation and presentation to the review body. The Management Review will address the possible need for changes to the policy, objectives and other elements of the system, in the light of audit results, changing circumstances and the commitment to continual improvement.

The Management Review will include but not be limited to consideration of the following issues:

- Changes in processes or activities which may affect the environmental aspects
- Changes in environmental legislation or regulations
- Achievement of objectives and targets
- Results of internal or external audits
- Incidents and or accidents
- Resources for the EMS
- Training needs
- The continued suitability of the policy

Minutes of the Management Review will be taken which will include any actions necessary together with responsibilities and time frames for completion.

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EMS Document Control

Doc Ref: OFW03b

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1 SCOPE

This document defines the system established for the control of environmental documentation and to instruct responsible personnel on the actions to be taken upon receipt of these documents and document revisions. This covers section 4.4.5 of the EMS Manual. Documentation affected by the procedure:

1. Environmental Policy
2. EMS Manual
3. Environmental Review
4. Registers
5. Objectives and Targets
6. Procedures
7. Emergency Plans
8. Environmental Schedules
9. Publications and Standards

2 REFERENCES

ISO 14001 Item 4.4.5

3 DEFINITIONS

Documentation means, all generated standard format documents given in section 1.

4 RESPONSIBILITIES

The Environmental Manager has responsibility for ensuring effective control of the information covered by this procedure, and for ensuring that the relevant and pertinent issues of approved documents are dispersed and available at all locations to those disciplines having need of the information to perform their assigned functions effectively. They are also responsible for the receipt, control, storage and issue of the documents.

4.1 Authorisation

Following the preparation and review of a document, it is approved and issued as follows:

- The Environmental Policy is approved by the Board of Directors and issued by the Environmental Manager.
- The EMS Manual is approved by a Director, reviewed by the Board and issued by the Environmental Manager.
- Registers, schedules, objectives and targets, and procedures are approved by a Director, reviewed by the Board and issued by the Environmental Manager.
- Emergency Plans will be approved by a Director, reviewed by the Environmental Manager and issued by Departmental Managers.

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- Publications and Standards are issued by the Environmental Manager.

5 PROCEDURE

5.1 General

Documents are generally internally generated by Down to Earth Recycling, apart from Publications and Standards.

All externally received documents (Publications or Standards) will be registered. A list of those requiring control will be kept by the Environmental Manager or designee. Other external documents are considered as reference only.

Should an external document be required for other than reference purposes, it will be controlled

It is the responsibility of the Director to ensure that external documents are controlled or reference.

5.2 External Document Control

Upon receipt of external documents, the Environmental Manager or his designee will register the documents and file them in the appropriate system.

The original of all external documents will be kept in the Document library.

Controlled external documents will be stamped “CONTROLLED COPY” in red.

Those copies not stamped “CONTROLLED COPY” in red, will be deemed to be uncontrolled.

5.3 Internal Document Control – Receipt

All documents will be numbered in accordance with P-001.

The Environmental Manager holds the register of all documents. It is the responsibility of the person writing a procedure or form to request from the EM the appropriate document code number.

Documents will be placed on the computer server and the EM informed. A hard copy will be printed and checked by the Director prior to implementation into the document control system on the server.

The register shall record the following information:

1. Document number

2. Document title
3. Date issued
4. Revision number
5. Date revised
6. Purpose of document issue (e.g. revision)

5.4 Internal Document Control – Distribution

All documents will be placed on the Server for use and as CD written copies for other locations not linked to the server. The CD copies will be issued using a transmittal form, which will be sent, signed by the recipient and returned to prove receipt.

5.5 Internal Document Control – Issue

Documentation will be controlled through the server. CD copies will be maintained of CDs issued, together with transmittals (either in paper or e-mail format).

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Any hard copies will be stamped ‘UNCONTROLLED COPY’ in black unless a controlled hard copy is required which will be marked “CONTROLLED COPY” in red. A list of all controlled copies will be maintained.
Only recipients of a ‘CONTROLLED COPY’ will be issued with any further revisions which occur.
All master documents will be marked or stamped ‘MASTER’ (in red). Copying of the Master document will be strictly controlled by the EM. Masters will be retained in hard format until such time that the management decide otherwise, at which time they will be removed.
Superseded copies of ‘ALL’ documents covered by this procedure will be marked or stamped ‘SUPERSEDED’ in red. Superseded documents from the server will be placed in the superseded directory on the server. Copies of CDs will be disposed of.
One copy of each superseded revision of each Document will be retained in electronic format.

5.6 Indexes and Registers
An index for each category of document will be prepared by the EM. These indexes will form the basis of the documentation register. Registers showing the status of documentation will be kept for all types of documentation.
It is the responsibility of the EM to ensure that these Registers/Indexes are correct. Any discovered discrepancy must be reported to the EM.

5.7 Storage
All paper documents detailed within these procedures will be transferred to archive files and clearly marked with the contents, or in electronic format as required.

5.8 Security of Electronic Documents
5.9

All electronic documents will be placed on the server in read only and protected format in order to prevent unauthorised adjustment.

6 ATTACHMENTS
None

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EMS Legislation & Emergency Contact

Doc Ref: OFW03c

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Regulations

The following list of Statutory Instruments is not exhaustive but it covers the principal regulations relating to the 2005 Act:

The Clean Neighbourhoods and Environment Act 2005 (Commencement No.4) (England) Order 2007 – S.I. 2007/390
The Environmental Offences (Use of Fixed Penalty Receipts) Regulations 2006 – S.I. 2006/1334
The Environmental Offences (Fixed Penalties) (Miscellaneous Provisions) Regulations 2006 - S.I. 2006/783
The Statutory Nuisances (Artificial Lighting) (Designation of Relevant Sports) (England) Order 2006 - S.I. 2006/781
The Statutory Nuisance (Appeals) (Amendment) (England) Regulations 2006 - S.I. 2006/771
The Statutory Nuisances (Insects) Regulations 2006 - S.I. 2006/770
The Joint Waste Disposal Authorities (Recycling Payments) (Disapplication) (England) Order 2006 - S.I. 2006/651
The Highways Act 1980 (Gating Orders) (England) Regulations 2006 - S.I. 2006/537
The Anti-social Behaviour Act 2003 (Commencement No.6) (England) Order 2006 - S.I. 2006/393 (C.11) -

http://www.opsi.gov.uk/SI/si2007/20071091.htm	The Energy Act 2004 (Commencement No. 8) Order 2007
http://www.opsi.gov.uk/SI/si2007/20071096.htm	Greenhouse Gas Emissions Trading Scheme (Miscellaneous Provisions) Regulations SI 2007/1096
http://www.opsi.gov.uk/	**Office of public sector information Website**
http://www.netregs.gov.uk/	**Net Regs Website**
http://www.defra.gov.uk/	**Department for Environment, Food and Rural Affairs Website**
http://www.environment-agency.gov.uk/	**Environment Agancy Website**

PRIMARY LEGISLATION	**SECONDARY LEGISLATION**	**AREA OF APPLICATION**
http://www.opsi.gov.uk/acts/acts1995/Ukpga_19950025_en_1.htm	Environment Act 1995	All Areas
http://www.opsi.gov.uk/acts/acts1990/Ukpga_19900043_en_1.htm	Environmental Protection Act 1990	All Areas
http://www.opsi.gov.uk/SI/si1988/Uksi_19880818_en_1.htm	Control of Pollution Act 1974, as amended 1989	All Areas
http://www.opsi.gov.uk/acts/acts1989/Ukpga_19890015_en_25.htm	Public Health Act 1936, 1937 & 1961	Noise, dust, nuisance
http://www.opsi.gov.uk/acts/acts1993/Ukpga_19930011_en_1.htm	Clean Air Act 1993	Pollution prevention
http://www.opsi.gov.uk/acts/acts1990/Ukpga_19900008_	Town and Country Planning Acts, 1959, 1971, 1981, 1990	All Areas

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en_24.htm		
http://www.opsi.gov.uk/acts/acts1999/19990009.htm	Water Industry Act 1999	Pollution prevention
http://www.opsi.gov.uk/acts/acts1991/Ukpga_19910039_en_1.htm	Wildlife and Countryside Act, 1981 as amended 1991	All Areas
http://www.opsi.gov.uk/acts/acts1999/ukpga_19990024_en.pdf	Pollution Prevention and Control (PPC) Act, 1999	Pollution prevention
http://publications.environment-agency.gov.uk/pdf/PMHO0501BFOX-e-e.pdf	Pollution Prevention Guidance (PPG) - Environment Agency- 2007>	Waste storage, handling, disposal
http://www.netregs.gov.uk/netregs/businesses/99900.aspx	Pollution Incidence response planning (Netregs Advice)	Waste storage, handling, disposal
http://www.opsi.gov.uk/SI/si1988/Uksi_19881790_en_1.htm	The Control of Pollution (Special Waste) (Amendment) Regulations 1988	Waste disposal
http://www.opsi.gov.uk/acts/acts1989/Ukpga_19890014_en_1.htm	Control of Pollution (Amendment) Act 1989	Waste disposal
http://www.opsi.gov.uk/si/si1993/Uksi_19930566_en_1.htm	Controlled Waste (Amendment) Regulations 1993	Waste storage, handling, disposal
http://www.opsi.gov.uk/SI/si1991/Uksi_19911624_en_1.htm	Controlled Waste (Registration of Carriers & Seizure of Vehicles) Regulations 1991	Carriage of waste
http://www.opsi.gov.uk/SI/si1992/Uksi_19920588_en_1.htm	Controlled Waste Regulations 1992	Waste storage, handling, disposal
http://www.opsi.gov.uk/SI/si1991/Uksi_19912839_en_1.htm	Environmental Protection (Duty of Care) Regulations 1991	Waste Disposal
http://www.opsi.gov.uk/ACTS/acts1990/Ukpga_19900043_en_4.htm	Statutory Nuisances and Clean Air	Noise, dust, nuisance
http://www.opsi.gov.uk/si/si1994/Uksi_19941056_en_1.htm	Waste Management Licensing Regulations 1994	Waste storage, handling, disposal
http://www.opsi.gov.uk/si/si2007/uksi_20073538_en_1	Environmental Permitting Regulations (England and Wales) 2007	Waste storage, handling, disposal

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http://publications.environment-agency.gov.uk/pdf/PMHO1107BNKG-e-e.pdf?lang=_e	PPG 5- Work Nearby Watercourses	Pollution Prevention Guidance
http://publications.environment-agency.gov.uk/pdf/PMHO0804BIDG-e-e.pdf?lang=_e	PPG 7- Refuelling Facilities	Pollution Prevention Guidance
http://publications.environment-agency.gov.uk/pdf/PMHO0304BHXB-e-e.pdf?lang=_e	PPG 8- Safe Storage & Disposal Used Oils	Pollution Prevention Guidance
http://publications.environment-agency.gov.uk/pdf/PMHO0307BMDX-e-e.pdf?lang=_e	PPG 13- Hi Pressure Water & Steam Cleaners	Pollution Prevention Guidance
http://publications.environment-agency.gov.uk/pdf/PMHO600BBUD-e-e.pdf?lang=_e	PPG 18- Fire & Water Spillage Management	Pollution Prevention Guidance
http://publications.environment-agency.gov.uk/pdf/PMHO0309BPNA-e-e.pdf	PPG 21- Incident Response Planning	Pollution Prevention Guidance
ing system	PPG 22- Spillages Over Waterways	Pollution Prevention Guidance
http://publications.environment-agency.gov.uk/pdf/PMHO0204TG25-e-e.pdf?lang=_e	PPG 26- Storage & Handling of Drums & IBCs	Pollution Prevention Guidance
http://www.environment-agency.gov.uk/static/documents/Business/ppg27.pdf	PPG 27- Install & removal underground tanks	Pollution Prevention Guidance
http://ec.europa.eu/environment/eia/sea-legalcontext.htm	SEA Directive Strategic Environmental Assessment Directive (European Community)	Planning - Pollution Prevention

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Old Ferry Wharf - Site Specific Management Plans and Control Documents

Licence(s) and Consents		
Employer's Liability Insurance	Certificate of Insurance	Licencing
EMS and Standard Operating Procedures		
EMS for Transfer Facility	EMS for Transfer Facility - Procedures and Protocols	Pollution Prevention
Standard Operating Procedures- Transfer Station		
Site Management Plans/Control Documents		
Accident Management Plan	Old ferry Wharf Ltd. Management Plan	Pollution Prevention
Odour Management Plan	Old ferry Wharf Ltd. Management Plan	Pollution Prevention
Non Technical Summary	Old ferry Wharf Ltd. Management Plan	Pollution Prevention
Standard Operating Procedure	Old ferry Wharf Ltd. Management Plan	Pollution Prevention
Fugitive Release Management Plan	Old ferry Wharf Ltd. Management Plan	Pollution Prevention
Lechate Management Plan	Old ferry Wharf Ltd. Management Plan	Pollution Prevention
Technical Standards Summary	Old ferry Wharf Ltd. Management Plan	Pollution Prevention
Company Policies		
Environmental Policy	Company Environmental Statement	In-House Legislation
Health and Safety Policy	Company H&S Policy	In-House Legislation

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Old Ferry Wharf

Management Responsibility for H&S	Company Management responsibility for H&S	In-House Legislation

Company Documentation

EMP register	In-House environmental management procedures register	Guidance
BS EN ISO 1400:2004 Guidance	Environmental management systems - Requirements with guidance for use	Guidance

EUROPEAN LEGISLATION

75/339/ECC: Directive on Waste
75/442/EEC: Directive on Waste Disposal
208/98/EC: Directive on Waste
206/12/EC : Directive on waste
91/156/EEC: Directive on Waste
91/692/EEC: Directive on Waste
92/43/EEC: Directive on the conservation of natural habitats and of wild fauna and flora
2001/47/EC SEA Directive Strategic Environmental Assessment Directive (European Community)

Health and Safety Executive
Edgar Allen House
241 Glossop Road
SHEFFIELD
S10 2GW

Environment Agency
Northern Area Office
Waterside House
Waterside North
Lincoln
LN2 5HA

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Old Ferry Wharf

0870 8506506

Authorised Persons:
Mr Steven Render
Mr William Foster

Company Registered Address

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EMS implementation schedule

Doc Ref: OFW03d

Bespoke Permit Application

Old Ferry Wharf

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	Old Ferry Wharf Limited Implementation schedule ISO9001 & ISO14001			2014						
	March	April	May	June	July	August	Sept	Oct	Nov	Dec
Register for Iso9001										
Manual										
Policy										
PLANNING										
Aspects & Impacts										
Legislation and Regulations										
Objectives and targets										
Management Programme										
IMPLEMENTATION										
Structure and Responsibility										
Training Awareness and Competence										
Communication										
Documentation & Documentation Control										
Operational Control										
Emergency Preparedness and Response										
Checking & corrective Action										
Monitoring and Measurement										
Non-conformance , Corrective & preventative Action										
Records										
Environmental Management Audits										
Management Review										

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Quality Policy

Doc Ref: OFW03d

Quality Policy Statement

Old Ferry Wharf Ltd, offer an Export / transfer operation via the docks. We pride ourselves on the quality service we offer and the strong working partnerships we have developed since the business was established in 2003.

It is the policy of Old Ferry Wharf Ltd to:

- give satisfaction to our customers and all other stakeholders, always meeting and wherever possible exceeding their expectations;
- comply with all applicable legal and other requirements to which Old Ferry Wharf Ltd subscribe;
- ensure that our management system conforms to the requirements of BS EN ISO 9001:2008 QMS, provides a framework to achieve our objectives and supports other management standards achieved by the business including ISO 14001 EMS and OHSAS 18001;
- provide all necessary resources, including equipment, infrastructure, training and competent staff to enable our objectives to be met, and
- work in partnership with our suppliers, clients and all other stakeholders to achieve optimum process control, legal compliance and continued planned improvement in the pursuit of business excellence.

Objectives and targets are consistent with the stated aims of this policy. Training will be an integral part of the strategy to achieve our objectives.

The Managing Director and the team have ensured that this management system policy has been implemented, maintained and is reviewed for continuing suitability at the scheduled management review meetings.

This policy has been communicated to all applicable persons working for and on behalf of Old Ferry Wharf Ltd and is available to all external bodies and members of the public upon request.

Steve Render
Managing Director
Old Ferry Wharf Ltd
March 2014

Environmental Policy Statement

Doc Ref: OFW03f

OLD FERRY WHARF

Old ferry Wharf Ltd

Environmental Policy Statement

Old Ferry Wharf Ltd, offer SRF waste transfer / export service. We pride ourselves on the quality service we offer and the strong working partnerships we have developed since the business was established in 2003.

We are a professional and environmentally conscious organisation which acknowledges the impact that our operations and activities may potentially have on the environment.

The clear objective and commitment of Old Ferry Wharf Ltd to minimise any impact by:

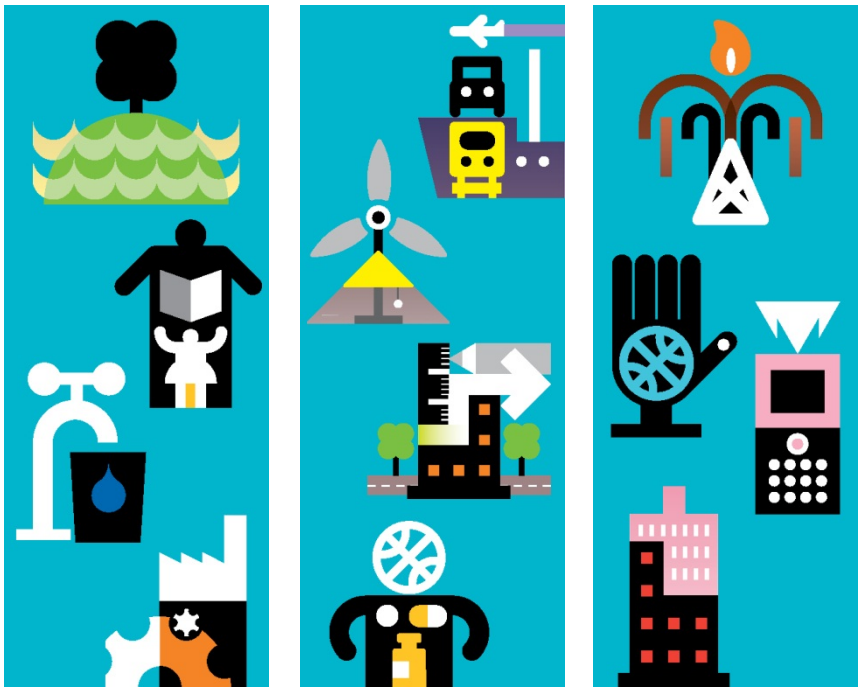
- complying with all applicable legal and other requirements to which we subscribe;
- preventing pollution and minimising waste wherever practicable;
- our commitment to continually improve environmental performance in all of our activities, practices and processes;
- taking action to identify, eliminate or reduce, as far as practicable, any potentially adverse environmental impacts;
- operating a management system which fully satisfies the requirements of ISO 14001: 2004 EMS and supports our ISO 9001 QMS and 18001 OHSAS systems;
- providing all the necessary resources, technology, expertise, equipment, information, instruction and training to fulfill the requirements of this policy;
- ensuring effective and expedient incident prevention, control, investigation and reporting, and
- Always operating in a socially responsible manner.

Objectives and targets are consistent with the stated aims of this policy supporting our management system framework and continually improvement.

The Managing Director and the team have ensured that this policy has been implemented, maintained and is reviewed for continuing suitability.

This policy has been communicated to all persons working for or on behalf of Old Ferry Wharf Ltd and is available to members of the public and other interested parties upon request.

Steve Render
Managing Director
Old Ferry Wharf
March 2014



Environmental Permit for Old Ferry Wharf

Accident Management Plan - EES/336366/B4/04

April 2014

Neales Waste Management Ltd

Accident Management Plan

Doc Ref: OFW04

Bespoke Permit Application

Old Ferry Wharf

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Old Ferry Wharf

ACCIDENT MANAGEMENT PLAN

EMERGENCY CONTACTS

SITE LOCATION DETAILS	
Access Via :	**Ferry road , Barrow Haven**
Site Phone:	**01489 533335**
Site Grid Reference	**TA0619323372**
EMERGENCY CONTACTS	
Emergency service	**Fire 01482 565333 Ambulance – 01482 670800**
Local Police	**Barton 01652 660222**
Environment Agency Hotline	**0800 807060**
Health & Safety Executive	**Sheffield (f) 0114 291 2379**
Electricity supplier	**EDN**
Local Authority	**North Lincolnshire council**
Waste Disposal Contractor	**North Lincolnshire Council**
Gas Supplier	**CALOR GAS**
Sewage undertaker	**Septic Tank**
Fuel Supplier	**WATSON PETROLEUM**
COMPANY CONTACTS (OUT OF HOURS)	
Permit Holder	**OLD FERRY WHARF 01469 533335**
Operations Manager	**Steven Render 07786082713**
Date of Plan	**03.03.2014**
Date of review	**03.03.2014**

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Old Ferry Wharf

ACCIDENT MANAGEMENT PLAN

ISSUE 1 DATE

Accident type	Potential for occurrence	Anticipated consequences	Actions to be taken
Leachate containment overfilled /failure	Leachate / rainwater containment tanks are sealed and are only operated at between 3-10% of their maximum capacity	Release of potentially polluting liquids into the wharf.	• Cease delivery of SRF to the storage pad. • Inform the site management • Monitor on a daily basis to ensure no liquids escape to surrounding wharf or land. • Establish barriers if necessary. • Drain tank and send off site as necessary. • Inform EA if Necessary • Record and review incident.
Plant or equipment failure • Diesel spillage • Hydraulic leaks	Very little likelihood of occurrence. Fuel to be dispensed from a fuel store. Hydraulic content (volume) of equipment very low and all work is carried out in a shed on a concrete hard standing with seal drainage. The site has no public access.	Potential polluting liquids flow onto hard surfaced area of facility.	• Stem leak if possible • Isolate using spill control kits or absorbent material. Bagged absorbent to be stored onsite. • Monitor leak and prevent any liquid from entering any site drains. • Drain any contaminated tanks, clean any spillage and dispose of waste appropriately

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Accident Type	Potential for occurrence	Anticipated consequence	Action to be taken
Fire • Failure to contain fire water • Fuel and oils • Buildings • Combustible materials • Waste materials • chemicals	Extremely rare , moisture content and temperature profile of process restricts excessive heat generation. Arson , site storage area surrounded by legio fire retardant concrete blocks and security gate.	• Potentially polluting liquids flow from hard standing and into wharf. • Fire spreading between areas of facility. • Toxic and polluting smoke. • Exploding of fuel containers. • Wind dispersal of pollutants	• Raise alarm on site • Ensure personnel evacuated and accounted for from danger area. • If possible to do so safely switch off all electricity / fuel supplies. • Ensure all staff are alerted. • Call fire service and other emergency services as required. • Maintain onsite fire tender. • Inform site manager • Ensure the interceptor valve is closed to capture all fire water & prevent pollution on site. • Inform E.A • Post member of staff at entrance to site to direct emergency services. • Liase and follow instructions of emergency team making them aware of any hazards on site. • Consult site register of COSHH if appropriate. • Record incidents • Storage of SRF only accepted 14 days before planned ship arrival.

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Accident Type	Potential for occurrence	Anticipated consequences	Action to be taken
Severe weather • Flooding • Wind damage	Medium risk due to recent weather changes	Potentially polluting liquids flowing onto and off hard standing	• Weather monitoring via weather stations • Cancel incoming loads • Ensure the storage area is clean of any debri and leachate. • Ensure the interceptor is cleaned out. • Open the valve to allow flood water and excessive rain water drain into the sea. • Wind – assess damage legio blocks are interlocked so movement will be minimal. • Inform site manager • Inform the EA • Repair damage .
Vandalism	Site to as secure as possible. Concrete legio blocks and secure gates. All mobile plant to be locked and kept inside buildings. All doors and gates locked outside working hours. Site is covered by CCtv which is remotely monitored and able to respond to movement.	All of the above.	• Assess damage • Mitigate any damage / pollution caused (follow fire plan) • Inform site management • Inform police • Inform E.A • Record incident

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