ENVIRONMENTAL MANAGEMENT SYSTEM

Wardle Industrial Estate, Green lane, Wardle, Cheshire CW5 6DB

Nick Brookes Demolition & Waste Disposal

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Oaktree Environmental Ltd

Waste, Planning & Environmental Consultants

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

Document History:

Version	Issue date	Author	Checked	Description
10.0	11/03/22	MM	NB	Post audit review to add plasterboard procedures/CAR response/WM3 section.
11.0	13/09/24	MM	-	Update required by Regulation 36 notice.

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Site Information & Key Contacts List

Site Address:	Wardle Industrial Estate, Green lane, Wardle, Cheshire CW5 6DB		
Site Operator:	Nick Brookes Demolition & Waste Disposal	**National Grid Ref:**	SJ 276 662
CONTACT	**DESCRIPTION**	**OFFICE HOURS**	**OUT OF HOURS**
Nick Brookes Recycling Ltd	Permit Holder	01829 260687	07585 117 390
Leighton Hospital Middlewich Rd, Crewe CW1 4QJ	Local NHS Hospital (Main)	01270 255141	999
	Accident & Emergency (A&E)	999	999
Tarporley Community Hospital 14 Park Rd, Tarporley CW6 0AP	Local Doctor Surgery (GP)	01829 732436	999 or 112
Nantwich Police Station Beam Street, Nantwich, CW5 5NE	Local Police Non-Emergency	01244 350000	999 or 112
	Police Emergency	999 or 112	999 or 112
Nantwich Fire Station King Place, Nantwich, CW5 5NY	Fire and Rescue Service (in Emergency Dial 999)	01606 868912	999 or 112
Environment Agency	Environmental Regulator	0800 80 70 60	0800 80 70 60
Cheshire East Council	Environmental Health Department	0300 123 5500	0300 123 5025
United Utilities Wastewater Services, Lingley Mere Business Park, Lingley Green Avenue, Great Sankey, Warrington WA5 3LP	Mains water and sewerage supplier	0345 672 3723	0345 672 3723
Oaktree Environmental Ltd - Lime House, 2 Road Two, Winsford, Cheshire CW7 3QZ	Secondary specialist waste and permitting compliance advisors	01606 558833	999 or 112

1 General Considerations

1.1 Site operator/permit holder

1.1.1 Nick Brookes Demolition & Waste Disposal are the permit holder and operate the following site types under a single environmental permit:

- A1 – Waste Transfer Station
- A2 – Soil Processing Facility
- A3 – Composting Facility

1.1.2 The waste activities carried at on the application site which are the subject of this Environmental Management System. The site receives mixed waste from the surrounding catchments delivered by their own vehicles and by other carriers from the area.

1.1.3 Developments in legislation such as the regular increases in the Landfill Tax have increased the need for effectiveness and scope of operations at waste transfer and recycling centres, leading to greater recovery rates for recyclable waste.

1.1.4 The recycling centre will allow the sorting and storage of waste to permit the recycling, recovery and re-use of waste sourced from the local area. The operations include manual and mechanical sorting of wastes and includes sorting and processing of construction and demolition waste to produce building materials, topsoil, hardcore, aggregate replacements and other products which reduce the need to use virgin building materials. During sorting, all recyclable materials will be segregated for further recycling elsewhere (i.e. plastic, metals, wood, paper/cardboard, green waste, etc.).

1.2 Permit information

1.2.1 The status log of the permit is as follows:

Table 1.1 – Status log of permit

Status log of the permit		
Description	**Date**	**Comments**
EAWML 50066	10/12/01	Waste Management issued to Nick Brookes for a waste transfer station.
EAWML 50066	02/02/05	License modified: Specific conditions were deleted and replaced.
Application EPR/EP3798CS/V003	23/05/11	Application to vary and consolidate an open windrow composting facility, a soil processing facility, increase the permit boundary and update the permit to modern conditions.
Variation determined EPR/EP3798CS	17/08/11	Varied and consolidated permit issued in EPR format.
Permit variation application pending	Expected 10-2024	Application to add additional waste types to the wash plant for the avoidance of doubt.

1.3 Relevant contacts

1.3.1 The contact details for the operator are as follows:

Nick Brookes Demolition & Waste Disposal
Wardle Industrial Estate, Green lane, Wardle, Cheshire CW5 6DB

Contact: Gary Edwards
Position: Transport Operations Manager
Tel: 01829 260687

1.3.2 Oaktree Environmental Ltd have been engaged to act as consultants for Nick Brookes Demolition & Waste Disposal to assist in the preparation of this Environmental Management System (EMS). This EMS has been prepared to meet the requirements of The Environmental Permitting (England and Wales) Regulations 2016 and the Environment Agency's Guidance: "*Develop a management system: environmental permits*".

1.3.3 Contact details for Oaktree Environmental are as follows:

Oaktree Environmental Ltd
Lime House
2 Road Two
Winsford
Cheshire CW7 3QZ

Contact: Marco Muia
Position: Managing Director
Tel: 01606 558833
E-mail: marco@oaktree-environmental.co.uk

1.3.4 A full list of relevant contacts (including key emergency contact numbers) is provided in the Site Information & Key Contacts List section after the contents page of this document.

1.4 Site location

1.4.1 The site is located on Land at Wardle Industrial Estate, Green lane, Wardle, Cheshire CW5 6DB as shown on Drawing Nos. 011/202/01 & 02. The national grid reference for the site is SJ60281 57158.

1.5 Permit area/waste management operations

1.5.1 The area which is the subject of this Environmental Permit application is outlined in green on Drawing No. 011/202/01. All references to 'the site' in this Management System shall mean this area and the associated infrastructure, plant and equipment. The permit refers to the site (transfer station for recycling construction and demolition waste, the wash plant and composting facility and storage).

1.5.2 The original Waste Management Licence No. (No. 61594) was replaced on 10th December 2001 by the current waste management licence EAWML/50066 which was issued to accommodate the adjoining land to form a new site. It was modified in February 2005 and then became an Environmental Permit under the Environmental Permitting (England& Wales) Regulations 2007. The permit is now regulated in accordance with the Environmental Permitting (England & Wales) Regulations 2016.

1.5.3 The site is located at National Grid Reference (NGR) SJ60281 57158 as shown on Drawing No. 2436/202/01.

1.5.4 The Environmental Permit is required for the storage (keeping) prior to removal, and treatment (all types of handling/processing) of waste. The Transfer Station facility includes:

- Sorting (with loading shovel/360° excavator or by hand),
- Screening (by using appropriate mechanical screening plant and equipment),
- Separation (by using appropriate mechanical screening plant and equipment),

- Shredding (by using appropriate plant and equipment),
- Baling (by using appropriate plant and equipment),
- Magnetic separation of ferrous metals,
- Crushing (by Crusher) of non-hazardous wastes,
- Storage of hazardous waste i.e. asbestos.

1.5.5 The wash plant involves washing, sorting, screening, separation and crushing waste for the purpose of recycling as soils, soil substitutes or aggregates whilst the Composting Facility includes physical treatment, composting and maturation of waste.

1.5.6 Some recycling operations which are not subject to control by the environmental permit may be carried out on site. Such recycling operations are either covered by another control regime and/or exemption under the latest Environmental Permitting Regulations. All exempt activities requiring registration with the Environment Agency will be notified in writing prior to commencement of the activity.

1.5.7 Specified waste management operations include waste disposal and waste recovery operations listed Annex IIA and IIB of The Waste Framework Directive 2008/98/EC and are listed in summary below:

D9: Physico-chemical treatment of waste for disposal.
D15: Storage of waste pending disposal.
R3: Recycling or reclamation of organic substances.
R4: Recycling or reclamation of metals.
R5: Chemical-physical treatment
R13: Storage of waste pending recovery.

1.5.8 Waste exemptions registered at the site are as follows and expire in August 2025:

- S1, S2
- T2, T4, T6, T9, T10, T14, T16

1.6 Hours of operation

1.6.1 The site will be operated (for waste treatment) during the hours specified below:

Monday to Friday	07:00 – 18:00
Saturday	07:00 - 18:00
Sundays, Bank/Public holidays	Closed

1.6.2 During times when the site is closed or not in operation, the site will be locked and secured to prevent unauthorised access. CCTV is in operation and all buildings are alarmed.

1.7 Waste Storage, Types and Quantities

1.7.1 The locations of the operational and storage areas are shown on Drawing No. 011/202/03.

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

1.8 Staffing and management

1.8.1 The table below details the staffing numbers for when the site is open for the reception and processing of waste.

Table 1.2 – Staffing numbers and responsibilities

Position	Employees	Responsibilities
Site manager / TCM	2	Overseeing and co-ordinating all activities which take place at the site / Ensuring that the site is being operated in accordance with the EP and in-line with attendant regulations
Machine / Plant Operator s / Operatives	7	Waste handling/processing, reception and plant operation
General operatives including Security guard / watchman	20	To conduct site patrols when the site is not manned / operational
Workshop operatives	3	Repairs to vehicles, plant etc.

1.9 Health and safety

1.9.1 All operations on site will be carried out in accordance with the relevant requirements of the Health and Safety at Work Act 1974. Conditions of site use for employees, visitors and contractors are shown in Appendix IV. These conditions will be shown to all site users and must be signed prior to using the site. Anyone refusing to comply with the conditions of use will be asked to leave the site.

1.10 Fit and proper persons

1.10.1 The site's Technically Competent Manager (TCM) will provide the required attendance time at the facility as required by guidance periodically issued by the EA. A copy of TCM's Certificate of Technical Competence (COTC) will always be made available in the site office.

1.10.2 The company, through the TCM, will ensure that a nominated deputy is sufficiently trained and familiar with the EP and this EMS document in addition to all relevant company procedures who, in the absence of the TCM, will act the competent person. If either the TCM or deputy is changed, the EA will be informed of the change and the relevant details of the replacement as soon as possible.

1.11 Convictions

1.11.1 At the time of writing, neither Nick Brookes Demolition & Waste Disposal nor any of the relevant people within the company had been convicted of an unspent relevant offence.

2 Site Engineering and Infrastructure

2.1 Site description

2.1.1 The site is located within Green Lane Industrial Estate as shown on Drawing Nos. 2436/202/01 and 2436/202/02. The main access route to the site is off Green Lane, situated 750 metres from the main A51 trunk road. The industrial estate accommodates a number of industrial/commercial operations and includes wood processing operation and local authority storage depot.

2.1.2 The recycling centre comprises two main areas:

a) An area to the south of Green Lane for the storage, treatment and processing of primarily construction and demolition wastes including the treatment building and wash plant.
b) Area for the storage of separated wastes, composting as well as skip storage, vehicle and repair workshops.

2.1.3 The location of the operational, treatment and storage areas are shown on Drawing No. 011/202/03.

2.2 Planning Status

2.2.1 The site has the benefit of several planning permissions issued by the Local Authority (Cheshire County Council) summarised overleaf:

Table 2.1 – Status log of planning

Decision date	Planning ref.	Description
28/07/1971	4/5/8243	Permission for ELV breakers and dismantlers
11/06/1981	7/7948	Erection of workshop/ storage buildings
23/02/1984	7/10758	Motor vehicle repair and recovery
24/02/1992	7/20202	Operation of a waste transfer station
23/12/1999	7/P96/0840	Operation of a waste transfer station and storage/rec. facility
31/03/2000	7/P00/0008	New extension and alterations to waste transfer station.
22/02/2006	7/2006/CCC/1	Change of use of adjacent land to increase storage area
06/07/2010	10/0276W	Change of use to composting and waste storage

2.3 Access and parking

2.3.1 The site is located as shown on Drawing Nos. 011/202/01 and 011/202/02 and access to the site is gained via Green Lane which runs between the two halves of the site.

2.3.2 The site has ample parking for site staff, visitors and HGVs as shown on Drawing No. 011/202/03.

2.4 Site office

2.4.1 The site offices are located as shown on Drawing No. 011/202/03. The documents listed below will be retained in the site office.

Documents to be retained in site office
The Environmental Permit (original & any subsequent variations)
This Environmental Management System (EA agreed document)
Current site diary (to record all inspections/visitors to the site)
Environment Agency inspection (CAR) forms
In-house inspection sheets/recording forms
Duty of care transfer notes (for 2 years minimum)
Hazardous waste consignment notes (kept for 6 years)
Waste delivery tickets
Accident book (& 1st aid kit)

2.5 Weighbridge

2.5.1 There is a weighbridge on site, located as shown on Drawing No. 011/202/03. All incoming wastes will be calculated using the weighbridge or by using conversion factors and/or HGV load capacities.

2.6 Notice board and signs

2.6.1 A notice board is erected at the site entrance displays the following information:

- The site name and address.
- The name of the permit holder and operator.
- The Environmental Permit number and accompanying statement stating that the site is permitted by the Environment Agency.
- Environment Agency contact details, Emergency No. 0800 80 70 60 and
- General Enquires No. 03708 506 506.
- Operator's "out of hours" emergency contact details
- Operating hours.

2.6.2 Additional signs are displayed around the site for operational / health & safety purposes. All staff and visitors will be required to comply with the requirements of all signs whilst on site.

2.7 Site security

2.7.1 The site security infrastructure is clearly shown on Drawing No. 011/202/03 and considered suitable to prevent trespassers. The main entrance gates are of galvanised palisade construction to a height of 2.3m. The gates will be padlocked when the site is unmanned to prevent any unauthorised vehicular and pedestrian access.

2.7.2 Fencing consists of a mixture of 2.0m high brick walls, 2.4m high palisade fencing and security gates and 3 – 4m high concrete panel walls. Litter/dust netting as also been installed in parts of the site to help minimise any dust or litter escaping from the site.

2.7.3 The site also benefits from 24hr on site security and has remotely accessible CCTV fitted with full site coverage and off-site supervision. The location of CCTV cameras are indicatively shown on Drawing No 011/202/03.

2.7.4 The site security will be inspected on a daily basis and any defects which impair the effectiveness of the security will be repaired to the same or better standard within 7 working days. All repairs will be noted on the site diary within 24 hours of the event.

2.7.5 The security measures at the site are under constant review. If unauthorised access becomes apparent as a problem at the site the security measures will be reviewed and improvements implemented forthwith.

2.8 Fuel storage

2.8.1 The location of fuel storage on site will be shown on Drawing No. 011/202/03 and procedures for fuel storage on site are as follows:

- The containers used for the storage of hazardous fluids will be surrounded by a bund capable of containing a minimum of 110% of the volume of fuel stored in the tank.
- All pipework and associated infrastructure will be enclosed within the bund.
- A lock will be fitted to the tank valve to prevent unauthorised operation.
- Any storage of oil will comply with the Control of Pollution (Oil Storage) (England) Regulations 2001 SI No.2954 or any subsequent legislation.
- All valves and gauges on the tank will be constructed to prevent damage caused by frost.
- The tanks will be clearly marked showing their capacity and product within.

2.9 Rejected Waste

2.9.1 Any waste which is rejected will be stored in a quarantine skip with a maximum capacity of and removed from the site the skip container is full. The location of this skip may vary as operating conditions permit (i.e. to permit the loading of rejected wastes but clear labelling and management control will ensure its use as specified). Rejected waste will be recorded on form NBRL/RF/2 or similar.

2.10 Drainage

2.10.1 The drainage arrangements for the site are summarised as follows:

a) The external yard areas used for the storage and processing of mixed, non-hazardous household, commercial and industrial wastes and areas used to store hazardous wastes are surfaced with concrete and drain through silt traps and gulleys to interceptors and finally to Wardle Treatment Plant.
b) All foul drainage directly links to the foul sewer system.

c) The Surface water from the roof gullies on the buildings also discharge via this drainage system.

d) The wash plant section of the site drains to surface water or a soakaway via a Class 1 by-pass interceptor.

2.10.2 All wastes accepted at the site which have potential to pollute will be stored and treated on an impermeable surface with contained drainage system.

2.11 Vehicles, plant and equipment

2.11.1 Waste will be handled using mobile plant such as loading shovels, 360^{o} excavators and telehandlers. Only trained operators will be permitted to operate plant on site. The plant/equipment on site may vary and additional equipment may be hired-in to cope with busy periods, larger jobs or jobs with specific requirements. A full list of plant is available in the site office.

2.12 Preventative maintenance

2.12.1 Much of the plant and equipment on site and all vehicles in the fleet are subject to periodic manufacturer maintenance to ensure proper working order in the form of service contracts. Site management undertake or delegate additional preventative maintenance checks on a more frequent basis to ensure, where possible, the machinery is mechanically sound. These checks will be carried out using a preventative maintenance checklist. Any outcomes, defects and actions taken will be recorded on this form and/or in the site diary

3 Site Operations

3.1 Preliminary procedures

3.1.1 Guidance will be given by the site management to all employees, sub-contractors, other waste carriers and customers regarding the waste types and operations which are acceptable at the site i.e. a copy of Appendix III of this document. The site will be used for the acceptance, storage and processing of waste using Nick Brookes Demolition & Waste Disposal's own vehicles/contracts and also for third-party users/hauliers whose details would be checked prior to the delivery/collection of waste. When customers book a collection request they are asked about the waste types they have and are advised of ant special procedures they must follow before collection to segregate waste types that need separate collection and other waste types that will have to be collected and taken direct to another site. Customers will also be advised of the need for them to undertake a WM3 assessment of their waste, where necessary.

3.1.2 The procedures below would be followed prior to the receipt of waste on site. When a driver employed by the permit holder arrives at the waste producers' premises, he/she will inspect the load for conformity with relevant regulations and safety procedures.

a) If the load is satisfactory the driver will ensure that the relevant paperwork (Duty of Care transfer note/delivery ticket) is accurate and will and remove the load from the premises.
b) If the waste does not meet the description stated on the controlled waste transfer note the customer is advised to check the note and give a more detailed description of the waste.
c) If the more detailed description of the waste reveals that the waste is not permitted at the recycling centre then the customer is advised that the waste must be taken to another site which is appropriately permitted to accept the waste(s).
d) If further instructions are needed the driver may also report back to the site manager.
e) Where it is suspected that the details given on the transfer note are incorrect the EA may be contacted for advice.

f) Where the load contains soil from an industrial site the procedures in Section 3.3 will be followed.

3.1.3 If further instructions are needed the driver may also report back to the site manager.

3.2 Checking in & inspection of loads (general)

3.2.1 All incoming vehicles upon arrival are required to report to the person in charge of waste acceptance at the site to ensure that the load has been weighed and documentation checked. The details of the load will be recorded and the duty of care note/company documentation will be further checked by the operator to ensure that the load is acceptable at the site, including a visual check prior to the vehicle proceeding to the tipping area shown on Drawing No. 011/202/03.

3.2.2 If non-compliant waste is discovered before deposit, the load will not be accepted and disposed of at an approved facility or returned to the producer. In cases where the presence of unauthorised waste is likely to lead to a breach of permit conditions, the EA will be contacted immediately to agree a course of action. Any deviation from the procedures or problems with any loads will result in tipping facilities being suspended for the offending company or customer (for loads brought in by Nick Brookes' drivers).

3.2.3 The nature of bulk loads makes full inspection difficult until the load is deposited. If the load is considered acceptable the driver will be instructed to deposit it to appropriate area on site. Loads are also examined at the point of unloading. If they are found to be unacceptable at this point the load will be either quarantined or reloaded and removed within a timescale agreed with the EA. If small levels of contamination are noted they are handpicked and reject material placed in a skip for safe disposal.

3.2.4 If hazardous waste (other than asbestos) or suspected hazardous waste is deposited on the site the material will be isolated with precautions taken to absorb any spillages and the area cordoned off. The EA will be contacted as a matter of urgency and the material left in situ until removed as agreed.

3.3 Checking in & inspection of loads

3.3.1 Each load described as inert or excavation waste is assessed for visual signs of contamination such as plastic, glass or metal within the material. If a load is deemed unacceptable for purposes of creating quality aggregate or topsoil then it will be returned to its source or directed to an alternative site.

3.3.2 Loads are also examined at the point of unloading. If they are found to be unacceptable, the load will be reloaded onto the delivery vehicle and undergo the actions stated in Section 3.2.3.

3.3.3 Loads which are delivered to the site and known to contain predominantly inert waste will be deposited in an inert waste stockpile prior to deposit in the wash plant. The waste in this pile will also undergo a further check for plasterboard/gypsum (to ensure this material does not undergo any mechanical processing) and then it will be stored to await treatment to produce hardcore, bulky waste, soil, etc.

3.4 Gypsum and plasterboard acceptance and assessment

3.4.1 The deposit of gypsum-based waste in landfill cells containing biodegradable waste has been prohibited since 2005 because the biological activity within the cell has the potential to generate hydrogen sulphide, which at low concentrations has the potential to cause odour nuisance and consequent permit breaches at the landfill sites. Shortly after the ban the Environment Agency issued guidance in the “Waste-can you handle it?” series entitled “Gypsum wastes and high sulphate bearing wastes” which clarified the position on gypsum wastes at the time, including guidance stating “2)If the content of the load contains small amounts of high sulphate bearing waste, e.g. less than 10%, it may be deposited in a non-specific cell”. This was a working guidance and not a precise measurement.

3.4.2 In November 2008 the Environment Agency issued their guidance "MWRP007 - Landfilling of gypsum waste including plasterboard", which clarified a change in their position since the guidance referred to in 3.5.1 was issued i.e. removing the 10% guideline value. Whist the guidance was never intended to allow the deposit of loads containing up to 10% gypsum/plasterboard, it is nevertheless the case that significant quantities of gypsum wastes continued to be deposited in landfill after 2005. The historical deposits in any landfill will also contribute to potential odour issues because gas production in landfill evolves over decades.

3.4.3 These procedures have been added to the EMS to clarify Nick Brookes' position on the acceptance and handling of gypsum containing wastes i.e. that it will be kept separate from all other waste on site, using the existing plasterboard segregation bay, which has been in use for a long time. All staff will undergo refresher training following issue of this EMS.

3.4.4 All waste transfer notes will be checked and updated, if required, advising that **no plasterboard is to be deposited in a mixed skip**. All existing and new customers will be informed of the importance of segregating plasterboard at the place of production due to the above issue. The site will only knowingly accept plasterboard in single stream loads and not part of any mixed loads.

3.4.5 Prior to delivering a skip to a property, the operator will ask the customer if any plasterboard is likely to be present in the load, i.e. what is the nature of the skip. If the customer is a builder or a householder having building works undertaken at their property, the customer will be provided with a separate bag for plasterboard / gypsum waste and a separate transfer note detailing the EWC code for plasterboard which is 17 08 02 or addendum to the main transfer note (dual coding).

3.4.6 The customer will be advised to place the bag of plasterboard on top of the skip or to the side of the skip prior to collection. The operator, when collecting the skip would ensure the bag is sealed and segregated from the mixed skip when loading on to the HGV.

3.4.7 If the customer refuses to segregate the plasterboard from other waste on the place of production, the skip will be subject to a more rigorous sort (shown in the sections below) when delivered to the site and the operator would inform the customer of a penalty charge.

3.4.8 Once a mixed load of waste is tipped, plasterboard contamination may still be present so the banksman / driver photographs the load before processing. This system is used to prove the presence of contrary items or misdescription, to enable the sales team to levy additional costs on the customer for their correct handling as detailed above.

3.5 Waste deposit & handling

3.5.1 The majority of non-hazardous types of wastes accepted at the site do not generally require special storage arrangements. However, there may be circumstances when specific characteristics of the waste require special handling and storage. In addition, the hazardous waste accepted at the site (i.e. bonded asbestos) require special storage arrangements as detailed below.

3.5.2 Once a load has been accepted by the operator the contents of the delivery vehicle are discharged into the appropriate reception area/bay/container as Drawing No. 2436/202/03. The waste treatment processes undertaken at the site generally involve the physical/mechanical sorting and treatment of waste for recovery.

3.5.3 Following initial tipping, waste is inspected and checked for any signs of contamination as part of the WM3 assessment procedures. Operatives will also be trained to identify pieces of plasterboard/gypsum to ensure they are deposited into the plasterboard storage bay to avoid mixing with other wastes on site. Where necessary the banksman and/or driver will photograph the load before processing. This system is used to prove the presence of contrary items or misdescription, to enable the sales/admin team to levy additional costs on the customer for their correct handling.

3.5.4 Once the waste is deemed suitable, the bulkier items of waste i.e. furniture, mattresses, wood etc will be removed using the mechanical grab. The pre-sorted waste will then be introduced to the MRF hopper for mechanical sorting in the trommel and picking line.

3.5.5 All wastes and recyclables separated by hand and by fixed and mobile plant will be stored in the relevant bay, skip or free-standing stockpile pending recovery or disposal off site. Soil and stones which have passed through the trommel will be transferred to the wash plant for processing, an activity which has been in place since the permit was varied in August 2011. The soil and stones have more recently been classified as trommel fines by the Environment Agency but there has been no change in the process undertaken. The wash plant is more than capable of processing the soily material into aggregates.

3.5.6 The site has also had a Secondary Aggregate Production Protocol document which details how aggregates are manufactured from waste and includes the wash plant process (Version 2.0 of the document was issued in September 2008 to include the wash plant process and has been periodically updated). The Environment Agency has been aware of the existence of the document since its issue and has inspected the site since 2008 in the full knowledge that material arising from the trommel, now known as trommel fines, has been processed in the wash plant.

3.5.7 When the permit variation application was submitted to add the wash plant to the permit the soily materials now known as trommel fines were not applied for as there was no intention of accepting them (EWC code 19 12 12) from third parties as incoming wastes. The only fines on site were those arising from wastes which had been accepted at the transfer station, which would now be called trommel fines but were not referred to as such when the permit was varied.

3.5.8 Permit Condition 2.3.2 states that “Waste shall only be accepted if: (a) it is of a type and quantity listed in Schedule 2 Table S2.1…” All of the wastes accepted on site are within this schedule. A permit application is to be submitted to add 19 12 12 to the list of wastes for the wash plant to avoid confusion.

3.5.9 The site supervisor and/or TCM will monitor the gypsum/plasterboard storage bay to ensure that there is sufficient storage capacity to segregate incoming plasterboard.

3.5.10 Cardboard, plastics, metals, wood etc for recycling will be deposited in separate skips/bays and stored in the yard prior to removal off site. Cardboard, paper and plastics may be baled

and stored on site. Wood may be processed on the adjacent permitted site. Location of storage of separated recyclables is shown on Drawing No. 2436/202/03.

3.5.11 Any wastes liable to give rise to contaminated run off/leachate are stored on an impermeable concrete surface.

3.6 Waste/product removal and export

3.6.1 When a collection vehicle arrives at the site to remove waste material or product, the driver will be instructed to report to the site office to confirm their identity. All relevant documentation will be completed, and the vehicle will be passed to pick up the load and take it to the designated recycler/disposal site (if the outgoing material has not been fully recovered on site). The product or waste will then be loaded using the loading shovel.

3.6.2 The operational outputs and residues produced by the site and the disposal or recovery routes envisaged are detailed as follows:

a) Brick/rubble - for crushing to produce 6f5 aggregate or similar product under the site's Aggregates Protocol and using the wash plant.
b) Plasterboard/gypsum – sent to a permitted site for further recycling/recovery.
c) Some materials will not be recovered after processing (or will not be fit for use at recovery sites) such as clays and some soils. These materials may be disposed at suitably permitted landfill site.
d) Fines/soils - as material for site restoration works on site or used as landfill cover (it should be noted that trommel fines alone is not a suitable description of waste because the input material governs the quality of the outputs).
e) Metals – will be taken to a suitably permitted site for further recovery.
f) Rejected material will be removed from site as detailed in Section 2.8.
g) Waste unsuitable for processing i.e. inert clayey soils will be sent to a suitably permitted site.

3.7 Dusty/dry wastes

3.7.1 Waste consisting solely of loose powder, dust or fibres will not be accepted. Dusty wastes will be managed in accordance with the sites Dust Management Plan (doc ref: 202-002-H).

3.8 Asbestos handling procedure

3.8.1 Bonded asbestos will be accepted at the site and will be immediately segregated into a covered lockable skip which will be stored on a concreted and drained area of the site. The area designated for the skip is shown on Drawing No. 2436/202/03. The asbestos material will be handled according to the following procedure to ensure that there is minimal disturbance and breakage of sheets. No more than one skip will be stored at any one time.

i) Inform customers of requirements regarding bonded asbestos.
ii) Check loads of incoming waste for asbestos.
iii) Reject all non-notified asbestos found in incoming loads.
iv) Spray asbestos materials with water to reduce dust hazard.
v) Ensure that all staff likely to come into contact with asbestos have been issued with the relevant PPE and trained in its use.
vi) If the asbestos is not in cement-bonded sheet form consult a specialist contractor for removal (fibrous asbestos is not accepted at the site).
vii) Separate from all other waste streams.
viii) Deposit all asbestos in an enclosed lockable container direct from the
ix) Delivery vehicle, and spray with water to eliminate any potential dust problems. Spray contents of skip with water prior to adding further waste.
x) The skip/container will be loaded to ensure there is minimal impact from waste being lowered in the skip. Where practicable sheets will be wrapped in polyethylene sheeting to reduce dust emissions.
xi) The container will be secure at the end of the working day.

3.9 Record keeping

3.9.1 Nick Brookes Demolition & Waste Disposal use detailed waste transfer and product notes in paper and electronic form to ensure compliance with the Waste Duty of Care Code of Practice - March 2016 (Section 34(9) of the Environmental Protection Act 1990). The following points detail the correct information required in order to comply with the Waste Duty of Care Code of Practice which the operator will provide on all documentation:

- a written description of the waste which has been agreed and signed by the operator and the next holder. The description is part of the waste information the operator will provide.
- a statement confirming that the operator has fulfilled the duty to apply the waste hierarchy as required by regulation 12 of the Waste (England and Wales) Regulations 2011 (see Waste Hierarchy Guidance for England and Wales)
- the description of the waste is accurate and contains all the information required to ensure the lawful and safe handling, transport, treatment, recovery or disposal by subsequent holders, including classification of the waste by using the appropriate codes (referred to as the List of Wastes (LoW) or European Waste Catalogue (EWC)) - Appendix A of the Waste Classification Technical Guidance provides a list of the codes as well as advice on how to assess and classify waste.
- the quantity and nature and whether it is loose or in a container, if in a container, the type of container
- the time and place of transfer
- the SIC code of the transferor (current holder of the waste)
- the name and address of the transferor and transferee (person receiving the waste) and their signatures (the signature can be electronic as long as an enforcement officer can view it)
- the capacity in which the transferor and transferee are acting (e.g. as a producer, importer or registered waste carrier, broker or dealer) and their relevant authorisation to act in that capacity (e.g. their permit number or registration number)
- For non-hazardous waste this will be done by using:

- a paper WTN and form to fill in or alternative documentation e.g. an invoice, as long as it contains all the required information.
- a season ticket which is a single waste transfer note that covers a series of non-hazardous waste transfers. The season ticket will last up to one year and be used for regular transfers of the same type of non-hazardous waste with the same carrier. If the operator has several sites serviced by the same carrier with the same types of waste collected, these can be listed in a schedule to the season ticket. The operator will keep a record of the collection times and the quantity of waste.

3.9.2 A waste information note will not be required for non-hazardous waste if the waste holder does not change on the transfer of waste e.g. the waste is moved to other premises belonging to the same business. However, it is best practice that the business understands who has responsibility for that waste and a record is kept of internal transfers for audit purposes.

3.9.3 **Hazardous waste:** The site will be accepting hazardous waste into the site i.e. asbestos and if any hazardous waste or non-conforming waste is to be removed, it will be done so using a fully completed hazardous waste consignment note and sent to a suitably permitted site. The records of which will be kept for 6 years.

3.9.4 A summary of waste types and quantities deposited at and removed from the site and origin and destination details are then forwarded to the EA, with submission due within one month of the end of each quarter as below:

a) Quarter 1: January to March (due on or before 30th April)
b) Quarter 2: April to June (due on or before 31st July)
c) Quarter 3: July - September (due on or before 31st October)
d) Quarter 4: October - December (due on or before 31st January of the following year)

3.9.5 Outcomes of inspections of waste types, transfer/treatment areas, storage areas, drainage, infrastructure etc., will be recorded on-site inspection form and detailed comments will be entered into the site diary (including action taken or proposed). NBRL/RF/4 (or similar).

3.9.6 Visitors to the site will sign the sites visitor's book located in the site office upon arrival stating the purpose of their visit and whom they represent.

3.9.7 Complaints will be recorded; NBRL/RF/7 is included as an advisory. Section 4.9 demonstrates further action on the event of any complaints received.

3.10 Weighing and categorising loads

3.10.1 It is proposed the weight of each load into and out of the site will be weighed using a weighbridge to obtain accurate data for the purposes of providing waste returns and tracking the annual throughput of waste.

3.11 Management techniques

3.11.1 All measures necessary to achieve a high level of protection of the environment and to ensure that the site is operated in accordance with the various management systems and permit conditions will be strictly adhered to.

3.11.2 The manner in which the facility is managed is a critical element in ensuring emissions from the site operations are minimised. Therefore, management of this facility ensures:

a) staff are competent to manage and operate the facility i.e. fit and proper persons;
b) waste acceptance procedures are in place;
c) appropriate storage and handling procedures are in place;
d) waste/product dispatch procedures are in place;
e) procedures and control techniques in place to minimise potential emissions to air, land and water;
f) there is an EMS, i.e. this document, in place to ensure standards are maintained, including incidents and complaints management procedures;
g) a communication programme is in place; and,
h) a health and safety programme is in place and is coherently conveyed to all staff and rigorously enforced throughout the whole of the organisation.

3.12 Site closure plan

3.12.1 In the event that the site ceases to operate as a waste transfer/treatment facility as set out in the site's EP, the following steps will be followed to achieve site closure:

a) Contact the EA to advise the Environment Officer(s) that the site is planned to cease / has ceased the acceptance of wastes under the permit.
b) The amount of residual processed and unprocessed waste on site will be assessed by the TCM to set a timetable for the final processing and timely removal of waste from site.
c) Following removal of all waste, plant and machinery from site a Site Investigation will be undertaken to ascertain the ground conditions of the land to which the site relates.
d) A surrender application will then be submitted to the EA for determination.

3.13 Sampling and inspection plan (WM3 compliance)

3.13.1 The waste types accepted at are strictly non-hazardous, with the exception of asbestos wastes. On waste treatment sites there is the potential for the concentration of hazardous substances, which arise at a non-hazardous thresholds in waste, to accumulate following processing. Whilst this is rare the requirements of the guidance document "WM3 Guidance on the classification and assessment of waste" must be met. There is a commercial incentive for the operator to avoid treating non-hazardous wastes in a manner that generates hazardous waste. It should be noted that WM3 assessment is a detailed process and not solely related to chemical analysis in a laboratory.

3.13.2 The initial treatment process at the site comprises mechanical screening and separation via the trommel and picking line. The fraction which is finer than 10 mm cannot be recycled due to its elevated fines content, hence remains a waste. This material comprises generally a mixture of fine sand, silt, stones, clay and fragments of other waste. Much of this waste can be processed in the wash plant to produce sand and aggregates. The filter cake (clay) which comes out of the wash plant contains the finer clay particles and the trash screen separates out plastic, wood, fibre contamination.

3.13.3 The lighter fractions of material which are separated at the site are further processed to manufacture refuse derived fuel (RDF) or solid recovered fuel (SRF). The site may not produce these outputs on a daily basis as disposal and recovery outlets vary.

3.13.4 Based on the above, there are several sets of 19 12 12 outputs produced at the site, which could be assessed to ensure that they meet the 19 12 12 code and not 19-12-11*. Whilst it is unlikely that the waste outputs will be hazardous the assessment will take place as a precautionary measure.

a) 19 12 12 trommel fines arising from the mechanical screeners/separators; and,
b) 19 12 12 SRF arising from the shredding of RDF.
c) 19 12 12 Filter cake arising from the wash plant press

3.13.5 As the above codes comprise mirror non-hazardous entries, the site will confirm the identity of the wastes by proposing to use test the following:

a) Regular testing for loss of ignition test on trommel fines in accordance with destination site requirements.
b) A regular WM3 waste classification test for the other outgoing wastes and trommel fines, based on the destination site's requirements.

3.13.6 The samples will be analysed for solid concentrations (mg/kg) in respect of the following determinands:

- Metals (Arsenic, water soluble boron, cadmium, chromium (III and VI), copper, lead, mercury, nickel, selenium, zinc)
- Ph
- Sulphate
- Total Petroleum Hydrocarbons (Criteria Working Group), or TPH-CWG, including benzene, ethylbenzene, toluene and xylene.
- USEPA polynuclear aromatic hydrocarbons (PAHs)
- Asbestos screen, with asbestos quantification should fibres be detected in the screen

- 'Loss on ignition' (LOI) for the purposes of informing the receiving site as to the landfill tax status of the waste.

3.13.7 The results of the analyses will be assessed using the WM3 guidance document (as updated) and determined as either hazardous or non-hazardous by the operator, with the assistance as necessary from a suitably experienced consultant. The results of the analyses will be provided to the EA on request along with an assessment of the non-hazardous / hazardous classification of the waste as part of the reporting regime in respect of the site's environmental permit. Results will be kept in the site office for a period of three years.

3.13.8 It is considered to use this method of testing for a period of 12 months and if the results over this period demonstrate the wastes are homogeneous, the monthly test of the fines will decrease to a frequency agreed with the EA.

Contingency action

3.13.9 In the unlikely scenario that one or more of the waste analyses in respect of the treated material at the site are considered to have hazardous properties under WM3, the following procedure will be followed:

- Verify with the analysing laboratory that the result is correct.
- If the result is correct, inform the Environment Agency.
- Collect one further sample in addition to the routine sampling from the waste and analyse for the determinands specified in Section 2.2.4.
- Report the results of the additional analyses to the Environment Agency along with an assessment of the degree to which the hazardous sample is representative of the waste generated by the treatment process at the site. Recommend further action as necessary which may include:
    - A review of the sampling frequency
    - A review of the site waste acceptance and handling procedures
    - A review of the treatment methods used at the site
    - Revert to monthly sampling until results revert back to homogenous status

3.13.10 Given the above, it is considered that there are adequate contingency procedures in place to minimise the risk that mis-classified or mis-coded waste may be exported from the site.

4 Environmental Control, Monitoring And Reporting

4.1 Breakdowns and spillages

4.1.1 In the event of breakdown of the loading plant, an alternative machine will be brought on site until it is repaired. If an alternative machine cannot be used then waste will be stored securely until the plant is repaired. The repair will be carried out at the most convenient location with absorbents used to clear oil or fuel spillages.

4.1.2 All site surfaces will be inspected daily when the site is in operation. Debris will be swept as required and placed in a skip for disposal to a suitably permitted site.

4.1.3 Any spillages of fuel/oil will be cleared immediately by depositing sand or absorbents on the affected area. The sand or absorbents will be placed in a skip to be taken to a suitably permitted site for disposal. All spillages of waste and windblown litter will be cleared by the end of the working day in which they occur. Spillage clearance procedures are detailed in Section 5.3.

4.1.4 All wastes liable to give rise to contamination will be removed from the site if the site is not secure or if operations cease or are temporarily suspended.

4.2 Site inspections and maintenance

4.2.1 The type and inspection frequencies for maintenance/housekeeping are listed on record form NBRL/RF/4. The inspection form will be completed by a person who is familiar with the requirements of the EMS and EP for the site. All details of defects, problems and repairs carried out will be recorded on the form on the day that each event occurs. Detailed comments may also be recorded in the site diary. All repairs will be carried out within 5 working days unless agreed otherwise with the EA.

4.2.2 All repairs to site security will take place as soon as practically possible and the site will be made secure until the repair has been carried out. Any major defects found during the daily site inspection will be repaired as soon as practically possible.

4.3 Control of mud and debris

4.3.1 Vehicles will be visually inspected before exit to check that loads are safe and that no mud is carried up the access track which could spill onto the surrounding highways from the wheels or bodies of HGVs. Visual inspections of the vehicle running surfaces at the site will also be carried out daily and staff will report any problems with mud or debris on the site roads immediately to the site manager.

4.3.2 The deposit of material on the access road or public highway will be treated as an emergency and will be cleared immediately by the operator using either a brush and shovel or vacuum tanker/road sweeper if necessary. Silt will not be washed into roadside drains or gullies or via the drainage system.

4.4 Control of dust

4.4.1 The site will be operated in accordance with an approved Dust Management Plan (DMP) (doc ref: 202-002-H) which is a stand-alone document dealing with the prevention and mitigation of dust related issues. Please refer to the DMP as the main site management document relating to this issue.

4.4.2 A series of dust mitigation measures will be implemented on site to ensure dust emissions are controlled as far as is practically possible. The measures include:

- Sheeting of vehicles delivering waste to the site (if necessary);
- sheeting of vehicles transporting potentially dusty loads off site;
- use of mains water or a mobile bowser to damp down materials stockpiles, vehicle running surfaces, vehicle loads and areas on and around machinery which may give rise to dust, especially during dry and windy conditions;
- use of road sweeper on site to dampen down vehicle running surfaces
- cleaning of any spillages using wet cleaning methods;
- use of crusting agents on stockpiles, if required;
- drop heights **ALWAYS** minimised to prevent dust emissions.

4.4.3 Site operatives will continuously monitor dust emissions whilst the site is in operation and will report back to the site supervisor for advice if required. The site manager will make a formal visual inspection of dust emissions at least three times per day. Results of monitoring will be entered into the site diary/record forms.

4.5 Odour control

4.5.1 The mixed waste will be contained within the transfer station and the prompt turnaround times for any wastes which could give rise to odours will mean the site will present a low risk of odour nuisance. A systematic approach will be taken to ensure the oldest waste is removed from the stockpile inside the transfer building. If malodorous waste is deposited on site it will be consigned to the skip for rejected waste or removed from the site immediately.

4.5.2 Olfactory assessments will be carried out daily and results recorded on the inspection form for the site (i.e. record form). Any wastes identified as giving rise to odour will be quarantine where possible and removed from site immediately where practicable.

4.5.3 The complaints procedure in record form NBRL/RF/7 will be rigorously enforced should a third-party complaint be received.

4.6 Litter control

4.6.1 Given the nature of wastes accepted at the site (i.e. light wastes including paper/cardboard), there is a risk of litter from the site so careful management is required to reduce the risk.

4.6.2 The deposit of waste containing litter will be done so inside the transfer building and the following storage will be in sealed skips. Netting is installed over parts of the perimeter which also doubles up as a dust barrier.

4.6.3 Daily inspections for litter will be carried out for the presence of windblown litter and operatives will be instructed to collect the litter and place it in a skip for disposal/recovery before the end of the working day. In any event, all light waste will be placed in skips before

the end of the working day. Regular checks of the areas immediately beyond the site boundary will be carried out by site operatives.

4.7 Control of pests, birds and other scavengers

4.7.1 As the site will be accepting household wastes there is potential for the risk of pests. A recognised pest control contractor will be brought in within 48 hours if any problems are encountered. The site will be inspected daily for the presence of vermin and the results of the inspection noted in the site diary or site inspection form.

4.8 Control and monitoring of noise & vibration

4.8.1 The location and surrounding industrial uses means noise associated with the operations will not greatly increase the existing noise level in the surrounding area. The waste operations will be carried out using the best practicable means at all times.

4.8.2 The likely sources of noise arising from the development; and, the actions to be taken / procedures to be followed or planned in order to prevent or minimise levels are shown on the table below.

Table 4.1 - Noise Management Table

Potential Noise Source	Action to be taken to prevent or minimise noise
HGVs travelling to and from the site for delivery/collection of wastes/products.	• All vehicles are required to be driven onto and off site with due consideration for neighbouring premises. • HGV movements will be spread out evenly throughout the day.
Loading/unloading of waste delivery vehicles	• Vehicles must be well maintained and operated with silencers. • Moving parts to be regularly lubricated. • All vehicles must be driven slowly around the site (5mph site speed limit). • Engines to be switched off when not in use. • Reversing alarms to be preferentially fitted with white noise alarms to minimise impacts on neighbouring sites. • No shaking of vehicle bodies whilst raised.
Operation of treatment plant	• Engines to be switched off when not in use. • Plant to be well maintained and operated with silencers. • Moving parts to be regularly lubricated. • Operation of the crushing/screening plant in strict accordance with the hours set out in Section 1.6 of this EMS will ensure any impact on the surrounding area is minimised during 'unsociable'

	hours when surrounding industrial operations are less intensive or dormant
Operation of loading plant (i.e. telehandler/360)	• Drop heights to be kept to a minimum, particularly when loading empty tipper wagon/skip/container to minimise noise/vibration. • Engines to be switched off when not in use. • Plant to be well maintained and operated with silencers. Moving parts to be regularly lubricated. All vehicles must be driven slowly around site. • Loading plant/machinery will only be operated at ground level, i.e. never on stockpiles.
Small vehicles travelling to and from the site (e.g. staff and visitor's cars, courier van deliveries etc.)	• All those working on and visiting the site to be made aware of need for considerate driving and keeping vehicles well maintained. • Small vehicles will arrive marginally earlier than the main site operating hours.

4.9 Complaints procedure

4.9.1 Any third party complaints received will be recorded on form NBRL/RF/7 and will include a record of the complaint, particulars of the complainant and details of any action taken to alleviate the problem to ensure the likelihood of a future third party complaint is minimised.

5 Emergency & Contingency Procedures

5.1 General

5.1.1 In addition to obligations imposed by RIDDOR '13 (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013) the permit holder will notify the EA of any serious injuries to employees of Nick Brookes Demolition & Waste Disposal, other site users or members of the public arising as a result of operations on site. Minor injuries such as cuts and grazes etc. will be recorded in the accident book on site. Separate procedures will be used for different types of emergency. An emergency at the site is defined by the site management as follows:

"Any incident which is likely to result in harm to human health or pollution of the environment or serious breach of permit conditions and serious detriment to the amenities of the locality."

5.1.2 For all emergency situations, the deposit of any further waste will be suspended where necessary to allow action to be taken safely. If necessary, staff and other users of the site will be evacuated to an area which is a safe distance away from the hazards. Staff handling the emergency will be provided with and trained to use the necessary PPE (personal protective equipment) unless the manager instructs them that the hazard is too severe and outside help is needed from the emergency services or specialist waste contractors. A visitor's book will be kept to check who is on site at all times.

5.2 Fire

5.2.1 No waste will be burnt, and no fires will be allowed on site. In the event of a fire occurring on site, the operator/site supervisor will exercise his judgement and extinguish the fire with the water hose or suitable fire extinguisher and/or call the fire service for assistance. Any fires will be reported to the EA on the working day that they occur. All staff will be evacuated from the site if necessary. Smoking is not permitted on site. Firefighting residues will be disposed of to a permitted waste management facility.

5.2.2 For quick reference, the following actions will be taken when fire is detected or suspected (Site operatives):

a) DON'T PANIC
b) RAISE THE ALARM (IF NOT DONE SO ALREADY)
c) NOTIFY THE SITE MANAGER (IF SAFE TO DO SO)
d) **DO NOT TRY TO TACKLE THE FIRE YOURSELF UNLESS YOU ARE TRAINED IN DOING SO AND YOU ARE SURE OF THE NATURE OF THE FIRE**
e) LEAVE THE USING THE MAIN ACCESS GATES AS QUICKLY AND AS ORDERLY AS POSSIBLE
f) ASSEMBLE AT THE SPECIFIED FIRE ASSEMBLY POINT WHICH IS LOCATED BY THE SITE ACCESS GATES.
g) THE SITE MANAGER OR DELEGATED OPERATIVE WILL BE IN CHARGE OF CALLING THE EMERGENCY SERVICES ON 999 AND ENSURING THAT ALL PERSONS WHO WERE WORKING ON THE SITE OR WHO SIGNED IN TO THE VISITOR'S BOOK ARE ASSEMBLED SAFELY
h) INFORM ALL NEIGHBOURING PREMISES WHO ARE LIKELY TO BE AFFECTED
i) INFORM THE ENVIRONMENT AGENCY
j) DO NOT RETURN TO THE SITE UNTIL YOU HAVE BEEN GIVEN THE ALL CLEAR BY THE EMERGENCY SERVICES AND THE SITE MANAGER

5.3 Spillages

5.3.1 Fuel which may be stored on site will be contained within a bunded receptacle/container to contain any primary leaks. If any oil and vehicle maintenance chemicals are kept on site, they will be stored securely. In the event of a spillage a spill containment kit (absorbent pads, booms or granules) will be used to prevent further spillage and the contaminated absorbents placed in a skip for disposal to a suitably permitted facility.

5.3.2 Any wastes which would be classified as having the potential to cause polluting runoff will be stored within the concrete area.

5.3.3 All site surfaces will be inspected daily for the presence of spillages when the site is in operation. Debris will be swept as required and placed in a skip for further processing on site and sent to a suitably permitted site.

5.3.4 All wastes liable to give rise to contamination will be removed from the site within an EA agreed timescale.

5.4 Breakdowns

5.4.1 In the event of plant breakdowns, alternative plant will be sourced until the existing plant is repaired to prevent potential over stockpiling of waste. If an alternative plant cannot be used then waste will be stored securely until the plant is repaired and if necessary, waste will be diverted to an alternative site. The repair will be carried out at the most convenient location with absorbents used to clear oil or fuel spillages.

5.4.2 Essential spares for plant maintenance are kept on site to ensure a repair can be carried out efficiently.

5.5 Drums

5.5.1 The deposit of drummed waste will not be allowed at the site. If a drum is concealed within a skip and is not observed until the skip is deposited in the waste transfer area then the following procedure will apply:

a) The staff member will visually check the condition of the drum from a safe distance, noting any labels referring to the possible contents or hazards.
b) The site manager will be contacted to verify the observations and to decide on further action.
c) The producer of the waste and the Environment Agency will be contacted for advice and further information if necessary and both will be informed that a breach of the Duty of Care and site permit conditions has occurred as the result of the unauthorised deposit.

d) No further waste will be deposited until the emergency has been dealt with.

e) All spillages will be cleared using a spill containment kit and all contaminated absorbents placed in a skip for disposal to a suitably permitted waste management site.

f) If the deposit results in serious reactions with other waste or harmful emissions or the drum contents cannot be identified, then the emergency services and/or specialist waste contractors will be brought in to assist. If necessary, staff will be evacuated from the site or to a safe area within the site and all occupants of neighbouring properties will be informed.

5.6 Adverse reactions

5.6.1 No wastes are accepted which will react to present such a hazard. If unauthorised waste is found in a skip and does present such a hazard the same procedures as for the deposit of drums (above) shall apply.

5.7 Staff shortages

5.7.1 In the event of unforeseen staff shortages arising from illness, suspension or no shows, the operator will make a judgement whether to reduce the number of incoming loads and divert material to an alternative site. The operator will then seek further employment within a timely manner to ensure the site can continue to operate at its required capacity.

5.8 Adverse weather conditions

5.8.1 **High winds** - There will be no sorting, processing or treatment of any wastes which are likely to be blown around during conditions of high winds. Vehicles leaving the site will be sheeted to comply with the requirements of the Duty of Care legislation.

5.8.2 The litter netting panels, waste processing building and the fact that waste reception area for mixed and light waste is to be stored within the transfer building helps to contain any light wastes likely to be blown off site during high winds. However, if there is a perceived

problem, then additional litter picking will take place on and off site. Vehicles leaving the site are sheeted to comply with the requirements of the Duty of Care legislation.

5.8.3 **Poor visibility** - The site will not operate in conditions of poor visibility such as dense fog to reduce the risk of vehicle collision.

5.8.4 **Droughts / warm weather** – Due to the site's surface and potential for mud tracking off site. Vehicles will undergo a stringent check and vehicle chassis would be washed down to reduce the risk of mud tracking off site. If this isn't suitable, the operator would source a road sweeper until weather conditions improve.

5.8.5 **Long periods of rainfall or flood events** – Due to the site's surface and potential for mud tracking off site. Vehicles will undergo a stringent check and vehicle chassis would be washed down to reduce the risk of mud tracking off site. If this isn't suitable, the operator would source a road sweeper until weather conditions improve.

5.8.6 The operator will set up a notification alert with the Met Office to receive prior notifications of the above unforeseen adverse weather conditions to ensure mitigation can be put in place prior to the event. The site may be forced to close during events which could cause a significant risk to staff, human health or the environment.

5.9 Closure of destination sites

5.9.1 In the event of destination site closures or seasonal demands for wastes leading to a longer storage duration, the operator can divert incoming waste and send stored waste to one of alternative sites or use the EA's public register for alternative sites who could take this material and then contact the destination site. The operator has more than one contract set up for outlets of material to plan for this event.

5.10 Operational failure

5.10.1 The manager will be contacted by staff in the event of any operational failure such as the breakdown of plant, systems or equipment and will decide whether operations are to

continue or be suspended prior to corrective action being taken. Serious operational failures, which result in the closure of the site, will be recorded in the site diary.

5.11 Bomb scare

5.11.1 In the unlikely event of a bomb scare, the site will be evacuated and the police contacted. The police will then assume control of the site until the threat has been verified or the device defused and removed. The EA will be kept informed of the events on site.

6 Training for Site Staff

6.1 Training needs assessment

6.1.1 All new and existing site staff are subject to a specific training regime based on their responsibilities to ensure all operations are carried out without harm to the environment or amenity of the surrounding area. Training in all aspects of the site and waste operations at the site with regard to the individual responsibilities of the site staff will help to prevent incidents occurring which may have an adverse impact on the environment and/or the employees and their co-workers.

6.1.2 An employee training record NBRL/RF/6 is provided in Appendix II which details a list of the training needs of all new site staff and also serves as a training review for existing site staff which will be carried out annually or a period set at the operator's preference.

6.2 Site rules and infrastructure training

6.2.1 This information is provided to all employees, visitors and contractors with a full understanding of the site's conditions of use, which is communicated and documented at induction for all staff with specific induction for visitors and contractors.

6.2.2 Competency should be demonstrated within this field to ensure the employee is fully aware of the site's surroundings and operations to ensure their safety and compliance with specific operating conditions at the site.

6.3 Emergency procedures training

6.3.1 All employees are required to be familiar with the Environmental Controls in Section 4.0 and the Emergency Procedures as detailed in the Section 5.0.

6.3.2 In addition to normal operating conditions as specified in the site rules, employees must also be trained in dealing with eventualities which may occur outside the scope of normal

operating conditions, so they are aware of how to deal with these situations in advance of an occurrence.

6.4 Fire safety / firefighting training

6.4.1 Management must provide all employees with appropriate fire safety training with regard to their individual responsibilities.

6.4.2 Emergency procedures detailing what measures employees should adopt should a fire occur at the site are detailed in Section 5.2 and are covered by the 'emergency procedures' training (see Section 6.3).

6.4.3 Regular fire drills are undertaken by site management to ensure proper procedures are followed by employees in the unlikely event that a fire incident occurs**.** These will be unannounced drills and will not form part of the induction or review training as specified in Section 6.1.

6.4.4 All training in relation to fire will be undertaken by site management who have been trained by a suitable Fire Risk Consultant. All training records will be kept within the site office.

6.5 Recognition of waste types training

6.5.1 All employees are given induction training and subsequent regular training to identify those waste types which are permitted for acceptance at the site under the site's EP and those wastes which are not. This will include specific training to identify those common wastes which may be found following deposit and are not permitted at the site and will also include more obscure wastes and how to handle these wastes safely. All employees are advised that they should refer any unrecognisable or unknown wastes to senior management, who should, in turn, follow procedures outlined in the EMS and/or contact the EA to agree a suitable method for removal.

6.5.2 Training is provided to all site users who handle waste on site and those in charge of administration and reporting. In-depth training will also be provided to drivers responsible

for collecting wastes from the site of production in accordance with Section 3.0. They will be trained to identify any wastes not covered by the EP for the site and inform the producer that an alternative facility must be sought for any non-compliant wastes.

6.6 Storage areas / limits training

6.6.1 Those employees who carry out their responsibilities at the site and those in senior posts must be trained to identify appropriate waste storage areas to ensure that waste storage operations comply with the requirements of the EP for the site.

6.6.2 Employees in these roles must also be trained to recognize storage limits to ensure that they are in accordance with those specified in Section 1.6.

6.7 Vehicle / plant preventative maintenance training

6.7.1 This training is provided specifically for the vehicle and plant operators in order to ensure that all plant and machinery is checked regularly to prevent any occurrences which may lead to any adverse impacts on the environment or human health.

6.7.2 Training will be in accordance with this document and will be based on the preventative maintenance schedule supplied by the plant/equipment manufacturer.

6.7.3 The same training will be provided to senior management enabling a dual-level maintenance programme.

6.8 Duty of care training

6.8.1 All employees dealing with consignments of waste are trained in the completion of Duty of Care Waste Transfer Notes and the appropriate auditing of destination sites and/or contractors to ensure compliance.

6.9 Plant operation training

6.9.1 Any employees who are required to operate loading or treatment plant for the movement or processing of waste will be required to undertake the necessary qualifications for the operation of the specific item of plant in question. This will be required prior to operating the plant and will be obtained through necessary external certification programmes.

6.9.2 Regardless of general plant operation certification, all operatives will be fully inducted in the operation of the specific make and/or model of plant used on site.

6.10 Permit / Management System training

6.10.1 All employees will be inducted into the operating conditions as prescribed in the EP for the site. Whilst much of the above training will provide specific guidance on many aspects of these documents, all employees will be made aware of the location of the EP and EMS in the site office. All managerial positions will be made fully aware of the site's operating conditions.

6.11 Training for contractors

6.11.1 General site training will be provided to any contractors who are working on the site on a temporary basis as described in Sections 6.2, 6.3 and 6.4 above.

6.11.2 Additional training will be provided to contractors in their area of expertise. If they are dealing with specific items of plant/machinery, site operating conditions and a general understanding of the EP conditions will be provided to prevent any adverse impacts on the environment.

Appendix I

Drawings

Appendix II

Record Keeping Forms

NICK BROOKES DEMOLITION & WASTE DISPOSAL
REJECTED WASTE - RECORD FORM NBRL/RF/2

DATE	
TIME	
WASTE DESCRIPTION	
QUANTITY OF WASTE	
PRODUCER/HOLDER'S NAME, ADDRESS & TELEPHONE No.	
NAME OF CARRIER	
VEHICLE REGISTRATION	
CARRIER REG. No.	
REASON FOR REJECTION OF WASTE	
ACTION TAKEN	

	NICK BROOKES DEMOLITION & WASTE DISPOSAL SITE INSPECTION FORM – NBRL/RF/4

WEEK STARTING

TYPE OF INSPECTION		FREQ	DAY						
			M	T	W	T	F	S	S
SITE ENTRANCE/NOTICE BOARD		**WEEKLY**							
SECURITY - GATES		**WEEKLY**							
SECURITY - FENCING		**WEEKLY**							
SITE ROADS (CLEAR FROM HAZARDS)		**DAILY**							
IMPERMEABLE CONCRETE AREAS		**DAILY**							
BUND AROUND CONCRETE PAD (INTEGRITY)		**DAILY**							
DRAIN (FUNCTIONING)		**DAILY**							
HOLDING TANK / SUMP / INTERCEPTOR		**WEEKLY**							
WASTE CONTAINERS		**DAILY**							
WASTE STORAGE LIMITS	ELVs	**DAILY**							
WASTE STORAGE LIMITS	SCRAP METAL	**DAILY**							
WASTE STORAGE LIMITS	WEEE (NON-HAZ)	**DAILY**							
WASTE STORAGE LIMITS	WEEE (NON-HAZ)	**DAILY**							
WASTE STORAGE LIMITS	OILS	**WEEKLY**							
WASTE STORAGE LIMITS	COMPONENETS	**WEEKLY**							
PLASTERBOARD CHECKS	MIXED WASTE	**DAILY**							
REJECTED WASTE TYPES / STORAGE		**WEEKLY**							
NOISE LEVELS		**DAILY**							
FIRES (ANY INCIDENTS REPORTED)		**DAILY**							
NO SMOKING SIGNS IN PLACE		**MONTHLY**							
SPILLAGES & ABSORBENTS		**DAILY**							
FUEL TANK/BUND INTEGRITY		**WEEKLY**							
LITTER		**DAILY**							
DUST		**DAILY**							
ODOUR		**DAILY**							
VERMIN		**DAILY**							
RECORDS		**WEEKLY**							
COMPLAINTS RECEIVED		**AS REQUIRED**							
OTHER (SEE NOTES BELOW)		**AS REQUIRED**							
INSPECTION CARRIED OUT BY									

	NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):

CHECKED BY			**SIGNATURE**	
POSITION			**DATE**	
Sheet			***of***	

NICK BROOKES DEMOLITION & WASTE DISPOSAL
PREVENTATIVE MAINTENANCE CHECKLIST– NBRL/RF/5

CHECKED BY	**POSITION**
DATE	**DATE OF LAST CHECKLIST**

	EQUIPMENT ITEM					
OFFICIAL MAINTENANCE CHECK REQUIRED (Y/N)						
IF NO, DATE OF LAST CHECK						
IF YES, DATE OF NEXT CHECK						
IS ITEM IN CORRECT WORKING ORDER						
LEAKAGES OF OIL/DIESEL ON MOBILE PLANT / VEHICLES						
IF NO, WHAT REPAIRS ARE REQUIRED (USE SEPARATE SHEET IF REQUIRED)						
WERE REPAIRS DETAILED ON THE LAST CHECKLIST						
IF YES, HAVE THEY BEEN CARRIED OUT						
ADDITIONAL REPAIRS OR ACTIONS REQUIRED						

NICK BROOKES DEMOLITION & WASTE DISPOSAL
EMPLOYEE TRAINING NEEDS ASSESSMENT / REVIEW - NBRL/RF/6

EMPLOYEE NAME				**DATE COMPLETED**			
POSITION				**REVIEW DUE**			
TRAINER				**OUTCOME**	**PASSED**		
POSITION					**FURTHER TRAINING REQUIRED**		
CARRIED OUT /SIGN OFF >	**Y/N**	**SIGNED BY EMPLOYEE**	**SIGNED BY TRAINER**		**Y/N**	**SIGNED BY EMPLOYEE**	**SIGNED BY TRAINER**
ENVIRONMENTAL PERMIT				**FIRE PREVENTION PLAN**			
MANAGEMENT SYSTEM				**FIRE SAFETY**			
SITE RULES				**EMERGENCY PROCEDURES**			
RECORD KEEPING / TRANSFER NOTES				**STORAGE /PILE SIZE LIMITS**			
RECOGNITION OF WASTE TYPES				**STORAGE DURATION**			
SECURITY				**FIRE DETECTION**			
VEHICLE CHECKS				**FIRE ALARMS**			
PLANT OPERATION				**FIRE FIGHTING EQUIPMENT**			
PLANT CHECKS				**FIRE WATER CONTAINMENT MEASURES**			
AMENITY - LITTER, ODOUR, PESTS etc.				**SPILL CLEARANCE**			
NOTES AND ACTIONS:							

NICK BROOKES DEMOLITION & WASTE DISPOSAL
COMPLAINTS REPORT FORM (NBRL/RF/7)

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

COMPLAINT RECORDING PROCEDURE:

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

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

2) Each complaint will be given a reference number.

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

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

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

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

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

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

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

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

Appendix III

Environmental Permit & Accepted EWC Codes

Appendix IV

Health & Safety – Conditions of Site Use

HEALTH AND SAFETY - CONDITIONS OF SITE USE

The following guidelines apply to all site personnel, contractors and visitors using the site (where applicable).

1) The site is covered by the Health and Safety at Work Act 1974 and its associated regulations and all users must abide by any relevant provisions. Any person found to be in contravention of the requirements of this Health and Safety Statement will be asked to leave the site.

2) All visitors and contractors must sign the visitor's book upon entry to and exit from the site. All vehicle drivers must report to the office and await instruction from the site manager/deputy before proceeding to deposit waste at the site.

3) All accidents, diseases, injuries or dangerous occurrences shall be reported to the site manager. All instructions issued by the site manager in respect of health and safety at the site must be followed by all site users.

4) A first aid box (including eye-wash bottles) is kept in the site office. If you are injured on site please alert a member of staff/trained first-aider for assistance.

5) All persons must wear the appropriate PPE on site including high visibility jackets and hard hat.

6) Safety boots must be worn by all persons in the waste treatment/storage areas.

7) Protective gloves must be worn for any operations which present a hazard of puncture to or laceration of the skin or for any manual handling work carried out on site.

8) Ear defenders, safety helmets (hard hats) and eye protection will be issued when deemed necessary and must be worn by all employees and contractors where required by the site manager or other site representatives.

9) Fire extinguishers are kept on site to deal with any fires - fires shall only be dealt with by employees of Nick Brookes Demolition & Waste Disposal unless alternative instructions are given by the site manager. Access to fire exits and firefighting equipment must be kept clear at all times. When the fire alarm sounds please follow instructions and leave the site in an orderly fashion.

10) Persons who are suspected to be under the influence of drugs or alcohol will be removed from the site.

11) Smoking is not permitted on the site.

12) Observe and follow all traffic directions and traffic/safety signs.

13) Drivers must comply with all safety instructions given by the site manager or appointed deputy.

14) All drivers are responsible for ensuring that their vehicle is safely loaded. Unsafe loads will not be accepted at the site and will not be allowed to leave the site until they have been made safe.

15) Drivers waiting to tip at the recycling centre shall follow the instructions of the operator and shall only tip in the designated area, unless advised otherwise. No tipping shall take place over sorted stockpiles.

16) Drivers must remain in the cab or stand well clear of the vehicle during loading or tipping. Once the vehicle has been loaded it must be securely sheeted (if necessary) before leaving the site. When sheeting and unsheeting the vehicle ensure that the engine is switched off, the ignition key removed and the parking brake is on. Do not gain access using the mudguards and wheels. Ensure that your ropes, hooks and sheets are in good condition.

17) Never travel with the vehicle body raised. Ensure you know the maximum height of the raised body of your vehicle.

Declaration: To be completed by site users

I have read and understand the conditions of use for this site and agree to comply with them at all times. I accept that neither Nick Brookes Demolition & Waste Disposal nor their employees shall be liable for any loss or injury arising from my non-compliance with the above conditions.

Signed..... Print name.....

Company/Organisation..... Date.....

Note: these conditions are included in the EMS for information only and may be revised regularly as part of the site health and safety policy.