

# **VALLEY RECYCLING** **LIMITED**

**TYDU FARM, NELSON**

**ENVIRONMENTAL MANAGEMENT SYSTEM (EMS) FOR**  
**THE OPERATION OF A HOUSEHOLD, COMMERCIAL &**  
**INDUSTRIAL WASTE TRANSFER STATION WITH**  
**TREATMENT**

**PERMIT NUMBER EPR/UP3695FZ/A001**  
**(EAWML 30225)**

**VRL/EMS/1/16**

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## INTRODUCTION

1. This document, titled the Environmental Management System (EMS) i.e. the 'management system', has been prepared for the operation of a waste transfer station with treatment and in compliance with the requirements of the Environmental Permit, EPR/UP3695FZ/A001 (EAWML 30225).

This includes the receipt of various types of wastes, their separation and segregation into various grades for recycling via the use of mechanical plant and/or manual sorting. These various processed materials are then stored within separate areas and/or stockpiles depending upon their selected end use prior to being moved off site. Waste deemed and defined as products under Quality Protocols are also stored pending their use/off site transfer.

Waste materials which are not recyclable on site are stored pending off site transfer to other waste management facilities for further processing/disposal.
2. These operations are performed principally within designated areas outside (see plan/drawing in the appendices) as appropriate, where waste vehicles discharge and mechanical and manual handling separation of wastes occurs. This also includes an area of hard standing/impermeable pavement to separate the wastes to recover and recycle before being transferred to prepared receptacles/areas pending off site transfer. These include a number of skips and bays for the temporary storage of permitted and wastes indicated under exemptions and again shown within the appendices.
3. Site plant is then used for the waste transfer where prepared wastes may be deposited directly into various forms of bulk transport.
4. The current operations may be observed as:
  - Screening/segregation, with the use of dedicated plant, to remove recyclable wastes with stockpiling pending further separation,
  - The use of an excavator/transfer shovel to load previously deposited and manually segregated wastes into the screening/crushing plant for further processing.
5. On the introduction of any changes this management system will be updated and submitted to Natural Resources Wales (NRW) for comment and subsequent acceptance.

## **1. MANAGEMENT**

### **1.1 General management**

This waste management facility will be operated in line with this management system prepared in conjunction with the Environmental Permit (EP).

Various documents referenced within it address those activities with the potential for causing a risk of pollution e.g. risk assessment.

A copy of the EP, management system and operating procedures will also be available at all times and located within the site office.

During the normal hours of operation site supervision will be available and Technically Competent Management (TCM, a COTC holder) will be available during site operations and in compliance with recommended/stipulated documented guidance/instructions issued by Natural Resources Wales and will be recorded within the site diary.

Records will be maintained sufficient to comply with guidance e.g. duty of care and site operations via the site diary and inspection/operational records.

Amendments to the management system will be notified in writing to the Agency as soon as practicable but at least within seven days.

### **1.2 Accident management plan**

This comprises a number of accident/emergency plans prepared in conjunction with an EMS template (see appendices) and will be prominently displayed within the site offices.

### **1.3 Site security**

Site security is maintained due to the normal operating times and thus the site is manned for the working day.

The following security measures are deemed adequate for the following reasons:

- Secure fencing provided along assessable site boundaries and/or bunding and thus enclosing the permitted/licensed area.
- Site access via secure gates at the main site entrance which will be locked out of normal operating times and in the unlikely event of the site being left unattended,

Daily inspection of both the site fencing and gates will be undertaken and recorded upon the daily site diary/inspection form.

This inspection form details any actions required as a result of this operation.

Any damage will be held secure by the end of the working day and any repair/maintenance will be completed within seven working days of notification.

## 2. OPERATIONS

### 2.1 Licensed activities

The types of activities performed at this location fall under the following NRW waste management Permitting activities.

#### Schedule 1 – Operations – as Environmental Permit

Table S1.1 activities

Activity reference	Description of activities for waste operations	Limits of activities
Waste transfer station with treatment activity.	<b>R13:</b> Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) <b>D15:</b> Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced) <b>D9:</b> Physico-chemical treatment not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12 <b>R5:</b> Recycling/reclamation of other inorganic materials	Treatment consisting of: - manual sorting and separation; - bulking; - crushing; and - screening of waste for recovery or disposal Only inert waste can be screened or crushed. Inert wastes shall be stored and treated on hard-standing or impermeable surface with sealed drainage system. All other wastes shall be stored and treated on an impermeable surface with sealed drainage system. Unless otherwise agreed in writing with Natural Resources Wales. Waste types as specified in Table S2.1.
Discharge of site drainage to ground/ surface water via an interceptor leading to soakaway	Drainage consisting solely of : - clean, rainfall dependant drainage from areas of the site used in connection with the storage or treatment of permitted waste only  Discharge of site drainage shall be controlled though condition 3.1.	

Permitted wastes may be generally delivered to the site via:

- Waste collection authorities,
- Commercial/trade wastes, as outlined above, being deposited for processing/recycling/bulking up,
- Industrial type wastes,
- The Companies own collection vehicles.

The majority of waste types will be deposited for processing/recycling/bulking up and/or other specified (as per the EP) wastes/materials stored outside pending processing and/or within secure containers e.g. impermeable and/or hardstanding surfaces as per the site plan.

Those materials suitable for further recycling/reprocessing whether on-site or elsewhere will be temporarily stored pending off site disposal/transfer or bulking up.

These wastes will be temporarily stored as indicated upon the site plan and can include:

- Inert wastes, Plastics, Wood, Scrap metals, Cardboard,

In addition a range of permitted wastes will be stored/used as indicated upon the site plan under exempt activities (see appendices) as they occur e.g. engineering works.

Where required site plant will be utilised to move wastes around the site, generally maintain housekeeping and reduce handling difficulties. Appropriate site signage will indicate the different materials undergoing processing and/or storage as appropriate in line with the site plan.

## **2.2 Waste acceptance (Permitted and exempt types)**

**2.2.1** The reception of wastes will be via the current recognised site access points (see plan/drawing) and in compliance with the Permit.

- a. Incoming wastes will be subject to cursory inspection by site personnel at various points and who will be made aware via training (records maintained) of those materials acceptable and to those of which require redirection off site (in line with the Permit).
- b. This will be achieved via:
  - the weighbridge with the normal 'duty of care' requirements,
  - by observation where practical to do so,
  - prior to tipping after removal of netting/sheeting etc,
  - at the point of discharge e.g. specified points.
- c. Records of waste receipt and off site transfer will be recorded in conjunction with the 'duty of care' and 'waste return' record systems.
- d. Wastes will then be directed to the most appropriate discharge point based upon:
  - The mix of recyclates,
  - The potential for recovery,
  - Wastes to be transferred to the plant for mechanical separation/handling/processing/screening/crushing.
- e. Non-conforming waste materials, found in the waste mass i.e. those not matching description and quantity, will be segregated and stored within a secure quarantine container, clearly indicated, of appropriate size and type, located upon the impermeable area (see plan/drawing in appendices).
- f. Site management will be immediately informed whereupon a waste non-conformance/rejection record will be completed.
- g. It is envisaged that seven days would be a sufficient period to arrange the best practical environmental option for the waste disposal. Natural Resources Wales will be made aware of non-conforming materials pending further investigation and appropriate corrective/preventive action.



- h. Non-conforming wastes will be recorded within the site diary and/or the site inspection form. These wastes will be isolated from permitted/acceptable materials and offsite disposal arranged as soon as practicable.
- i. Remedial measures will be taken in order to reduce the potential for recurrence via site records/documentation being passed to the waste producer/carrier/disposer as determined after investigation by site management.  
This is dependent upon tracing the waste producer/carrier/disposer if not already established, any regulatory involvement and/or applying the Best Practicable Environmental Option for final waste disposal.
- j. Arrangements for the offsite transfer/disposal of materials will be made as soon as arrangements can be finalised taking due account of their potential to cause environmental disbenefit/nuisance e.g. odour etc.
- k. Rejected wastes will be transferred off site in conjunction with the 'duty of care' requirements as appropriate.

### **2.2.2 Permitted wastes**

The waste types accepted at this site are listed in the appendices.

No more than 25,000 tonnes of waste will be accepted at this site per year and the waste types, EWC etc. are listed as per the EP Schedule 2 (see appendices).

This activity has been permitted by Natural Resources Wales and the process plant is located within the areas/bays as indicated upon the site drawing/plans.

Exempt activities/wastes are also indicated, where appropriate, upon the site plan and within the appendices as they occur.

Wastes containing materials which appear suspect i.e. non-conforming, which could be difficult and/or hazardous as defined within NRW/EA guidance documents (previously Waste Management Papers) and other relevant legislation/guidance are not permitted in conjunction with the Permit.

Wastes deemed to be products in line with approved protocols will be separated and signposted as such and their location shown upon the site plan as appropriate.

### **2.2.3 Hours of operation**

The normal hours of operation are between the following times: -

Monday to Friday: 07.00 hrs to 19.30 hrs,

Saturday: 07.00 hrs to 16.00 hrs.

(Crushing/screening – 08.00 hrs to 1700 hrs)

Sundays, Bank or Public holidays – no operations except in cases of emergency where any emergency working arrangements will be agreed with NRW as they occur.

### **3. EMISSIONS AND MONITORING**

#### **3.1 Emissions to air, water and land**

There are no point source emissions generated from this waste facility.

#### **3.2 Transfers off-site**

All waste materials will be accepted, handled, held pending off site transfer and appropriate records kept as indicated within this management system.

Permitted wastes removed from site will be in compliance with the 'duty of care' and thus capable of being tracked for any future reference.

These wastes will then be weighed out and a record of the weight taken however of this is not possible due to weighbridge problems then off-site wastes will be via calculations of weight/volume made in line with NRW/EA guidance.

#### **3.3 Fugitive emissions of substances**

##### **3.3.1 Dust (refer to dust management plan)**

This has the potential to cause a problem/nuisance via:

- The processing operation through from loading to stockpiling,
- The on-site transfer of materials between the processing area and the stockpiling/storage areas,
- The loading of processed materials onto transport vehicles,
- Where appropriate the sweeping of roads where there has been deposits observed.

Therefore where airborne material is observed, this will be recorded via the site diary and corrective/preventive taken e.g. controlled by the use of dust suppression. This would comprise of a spray/mist via jets/nozzles, hose spray and/or using a bowser within the processing area thus limiting dust emissions.

Nevertheless the likelihood of this occurring is low due to:

- Waste types – low quantities of dusty type wastes
- Natural ventilation.
- Screened/bunded/Isolated location

Due regard will also be given to wind conditions and direction and operations suspended pending satisfactory operating conditions as outlined within the risk assessment (see appendices). Where emissions are observed due to site processing/operations then dust suppression will also need to be considered before suspension of these operations.

Due to the presence of site operatives during the operation of the facility visual monitoring will be performed throughout the working day.

Records of such will be recorded within the site diary/inspection form.

In addition this location is distant from other properties and thus there is a low potential to cause significant environmental harm or health hazard to neighbours.

### **3.3.2 Litter and/or mud**

#### **3.3.2.1 Litter**

Due to the accepted types of waste to be received/processed at this location and the limited quantity of light wastes then the potential for windblown litter from site is negligible. Where practical to do so then light wastes/recyclates will be stored in enclosed/covered containers, in compliance with the permit, specified waste and exemptions, pending storage and/or off site transfer.

Nevertheless in the event of windblown litter being generated the following control measures can be instigated, on the direction of site Management,

- Cessation of operations pending satisfactory weather conditions being re-established,
- Site operatives to be redirected from normal work activities to litter picking duties.

#### **3.3.2.2 Mud**

Due to the site being made up of concrete and hard standing surfaces then mud etc. is not envisaged to be a significant problem under normal operating activities. However corrective/preventive action will be taken and recorded within the site diary.

In addition other remedial measures will take the form of manual removal of any mud/debris deposited upon the highway and/or hire of road cleaning/brushing equipment depending upon the level of debris present and any difficulties for in its removal. Site equipment will include wide brushes, shovels and hose/bowser/washing equipment.

The road and internal hard standing/impermeable pavements will be inspected, by site personnel, and the condition of such recorded at the end of the working day.

### **3.3.3 Liquid storage**

No liquid wastes are accepted on site.

### **3.4 Odour**

Due to the type of facility and the limited types of wastes allowable under the Permit there is a very low potential for odour.

In the unlikely event where it has been determined via monitoring and/or complaints (recorded within site documents) that malodorous wastes are present these will be identified and recovered from the other waste types, contained within covered containers and removed as soon as possible from site but no later than at the end of the working day pending arrangements being able to be actioned.

In the event that odour-generating wastes are received the following action will be taken:

- The prevention of odorous waste being accepted in future loads by recording and noting the waste producer/carrier as per the 'duty of care' records,
- The rejection (and recording) of such wastes depending upon the severity of the odour in conjunction with any complaints and the perception from site management of a nuisance/problem,
- Off site transfer as soon as practicable taking account of the 'duty of care' requirements, odour determination where practicable and acceptance arranged at an alternative waste management facility.

Where odours are perceived, site operatives will respond to complaints and alert site management of the event. A record of odour detection will be kept in the site diary/ inspection form and any further action required/taken. Where possible this will be done in line with available EA guidance.

### **3.5 Noise (refer to noise management plan)**

Due to the primary operations being performed within an enclosed and relatively isolated area upon site it is not thought noise levels will be a problem.

The equipment/plant employed will be operated to the required standard, maintained as per supplier recommendations, monitored via the site diary and regulated by appropriate authorities as appropriate.

The following will also be given attention:

- Plant will be fitted with appropriate silencing equipment, as per supplier/manufacture recommendations and will be maintained and repaired accordingly.
- Where there is any doubt over the integrity of such plant, and/or excess noise is brought to the attention of the operators by the Regulatory Authority, and then levels will be determined in line with current practice and relative standards applied to such activities. The noise assessment/levels may/will need to be determined by a competent person.
- Retention/maintenance of the bunds surrounding the operational areas of the site.
- Handling/movement of containers/skips.

Nevertheless the following management plan will be followed to prevent and/or in response to substantiated noise complaints:

- To record, via the NRW/EA approved record form (see appendices), the information about the event,
- To suspend excess noise generating operations pending review/action,
- To record the times/days of the crushing/screening operations,
- To investigate on-site emissions where appropriate to do so,

- Where appropriate employ the services of a consultancy service to validate the noise source/emission.

### **3.6 Control of Pests**

Constant vigilance will be exercised to the operation of the transfer station in order to determine pest activity and a record of such observations will be recorded within the site diary/inspection form.

As there are only a limited range of wastes accepted i.e. principally inert types received at this site then the potential for pest activity will be minimal.

Where observed this will be reported to site management and recorded within the site diary and an incident report produced. Remedial measures will be taken for the control of pests and where deemed appropriate and necessary by employing the services of a recognised pest control organisation, i.e. the use of dusting/spraying for flies etc and poisons for vermin. This will be recorded on site.

The following visual monitoring for pests, vermin etc will be performed: -

- Evidence of droppings
- Evidence of damage to property/plant
- Evidence of ground disturbance e.g. nests
- Excessive infestation present.

Similarly the presence and control of birds and other scavengers will be limited due to the nature of wastes accepted at this facility and the covered operation. In addition due to constant use and movement of site plant during operational hours this will deter the number of birds and scavengers likely to be present.

### **3.7 Monitoring**

No formal monitoring is required under the existing Permit conditions.

## **4. INFORMATION**

### **4.1 Records**

#### **4.1.1 Security and availability of records**

All records pertinent to the operation of the site will be securely stored and protected from adverse conditions.

These will include the Permit, Management System, support documents and the site diary/inspection forms.

The site office is principally manned during the working day and records will be held within a safe environment.

Transactions performed at the weighbridge may include:

- Period contract notes
- Transfer notes
- Weighbridge dockets/tickets
- Site diary/inspection forms
- Corrective/preventive action forms
- Rejection notices

Storage of such information will be controlled by management and will be available for inspection on request.

#### **4.1.2 Records of waste movement**

All wastes entering and leaving site will be recorded and relevant information retrieved from the 'duty of care' records.

These will include, where appropriate, period contract notes, transfer notes and weighbridge ticket transaction records to include the EWC/SIC codes as appropriate.

#### **4.1.3 Site diary**

A site diary/inspection form will be kept on site where normal and any abnormal operations/situations which may arise, will be recorded and any necessary action taken. The inspection will be performed, by nominated site operators and/or management and this record will normally be completed at the end of the working day.

A copy of the site diary/inspection form is included within the appendices.

In addition various record forms have been obtained from within NRW/EA guidance e.g. EMS and will be employed at this location (see record forms in appendices).

As appropriate to the operations/processes at this location these include records (not exhaustive) such as:

- Complaints,
- Training,
- Maintenance,
- Accidents/incidents,
- Non-conformances.

#### **4.1.4 Monitoring of meteorological conditions**

A record of general weather conditions shall be kept on a daily basis.

### **4.2 Reporting**

#### **Periodic reporting of environmental performance**

A quarterly summary will be submitted to NRW in a form to comply with requirements.

A copy of the waste classification (EWC) will be held on site for reference.

#### **4.3 Notifications (as per Permit requirements)**

The following information, for example, may be submitted to NRW as soon as practicable after the event (in line with the Permit conditions and Schedule 5):

- Accident and/or fugitive emission (within 24 hours),
- Breach of operating procedures e.g. permit (within 24 hours),
- Significant adverse environmental effect e.g. pollution incident (e.g. within 24 hours of detection),
- A change of TCM (14 days)
- A conviction and/or an appeal (14 days)
- Financial changes affecting the site operations with regard the conditions within the permit (14 days),
- Activity commencement and/or changes (14 days).

#### **4.4 Interpretation**

As per the meanings described within the Permit.

### **5. OTHER SITE ACTIVITIES**

#### **5.1 Materials**

These will be subject to any pertinent regulations to them being held on site. This will include items such as diesel which is held within a double skinned tank and subject to routine inspection during its storage and use.

#### **5.2 Site infrastructure**

The general site layout is indicated upon the drawings/plans within the appendices. Those wastes identified upon these plans will be stored within designated storage areas as indicated such as for wastes, specified wastes and exemptions.

Permanent site lighting will be provided supported by the use of lighting units/towers and/or site plant as and when required.

The site identity board of durable material and finish will be prominently displayed at or near the entrance to the facility and the condition/clarity will be checked daily.

This will display the following information:

- Site name and address
- Permit holder name and Operator name
- Permit reference number
- Emergency contacts and telephone numbers
- Natural Resources Wales local and national numbers
- Normal operating periods – days and times.

The on-site weighbridge will be used to record waste inputs and outputs as required and particularly for commercial reasons. This weighbridge will be operated and maintained in compliance with the requirements of Trading Standards. If the weighbridge becomes unavailable, then the weight of received waste will be assessed, by utilising the conversion factors within guidance produced by the NRW/EA.

The weight of despatched waste will be retrieved from the waste disposal or receiving site or again assessed from conversion factors.

### **5.3 Risk assessment**

This is included within the appendices to address the normal site activities and that required whereupon a deviation from this occurs.

### **5.4 Plant & equipment**

All plant and equipment will be operated and maintained with due regard to supplier/manufacture recommendations. Records of service schedules and breakdowns will be maintained on site as will procedures to remedy any unforeseen incidents of which could lead to harm to health, loss of amenity and/or pollution of the environment.

The existing processing plant comprises the following items:

- A feed hopper which supplies the crushing/screening plant,
- Conveyors,
- Various mechanical handling equipment e.g. shovels,
- Excavators,
- Mobile screening equipment,
- Roll-on/off type vehicle to lift and move skips,
- Various sized containers/skips.

Arrangements will be provided for the storage/maintenance of plant and equipment used in accordance with manufacturers/suppliers recommendations.

### **5.5 Wastes storage/treatment/usage/exempt areas**

There are various areas and containers available to adequately store waste materials prior to them being processed/transferred off site.

This would include materials being temporarily held within: -

- A number of designated/signed skips and/or bays
- Various wastes stored pending off site transfer

It is envisaged that the maximum quantity of waste to be held on site at any time would be no more than 3,000 tonnes.

Typical materials held will consist of processed and un-processed inert wastes, recyclates and others as those indicated within the appendices and site plan.



As indicated on this plan wastes will be delivered to site and held depending upon the type and treatment/processing required in order to obtain recyclables, product and/or wastes. Mixed construction type wastes will be transferred to the screen etc. for processing and recyclables etc. collected and held within various sized containers and/or stockpiles.

Stockpiles of specified wastes, exempt materials and aggregate products will be stored upon hardstanding areas pending any further screening/processing as appropriate and/or pending off site transfer (see appendices).

Any waste exempt areas will be registered as indicated upon the plan and will be in compliance with sections of the Environmental Permitting Regulations and amendments. The types and location of exempt materials will be indicated within the appendices.

A list of all the materials registered as exempt, their European Waste Catalogue (EWC) codes and their location are indicated upon the site plan.

## **5.6 Pollution control**

### **5.6.1 Fire**

No waste materials are to be burned on the site and in the event of an unplanned fire outbreak the emergency plan (see appendices) will be implemented.

Fire fighting equipment will include: -

- Fire extinguishers
- Water hoses
- Sand/inert material.

The emergency services where appropriate and Natural Resources Wales will be informed in the event of a fire or spillage particularly where there is a potential for harm to health and/or environmental damage.

### **5.6.2 Potentially polluting leaks and spillages**

Site plant and equipment will be regularly maintained in line with the suppliers/manufacturers specification/service schedule and thus the potential for pollution will be minimised. In the event of any leaks absorbent materials such as sawdust, sand, soils, granules/booms etc stored on-site, will be used to contain any leaks and then removed from site.

All incidents will be recorded within the site diary noting the cause and the remedial actions taken and as review to implement preventive action will also be performed.

Control and remediation of leaks and spillages should be of a low order due to the limited nature of the wastes normally accepted at the site.

Thus, there is only a small potential for polluting leaks and spillages from wastes and waste containers being released.

All containers used to store wastes will be checked for their integrity and to ensure any potential contaminated fluids formed will be contained.

Areas used for the storage of wastes, specified wastes, exempt materials and those wastes within secure/covered containers will be regularly inspected for potentially contaminated fluids and the necessary corrective/preventive action taken to contain and to arrange correct management as appropriate.

### **5.6.3 Engineered site containment and drainage**

The indicative site layout is detailed within the site plans/drawings (see appendices).

These may be presented as: -

- Drainage via soakaways and/or interceptors,
- Waste separation/sorting/transfer areas and water subsequently collected/stored within an interceptor/sealed tank pending discharge and/or off site transfer,
- Concrete impermeable areas,
- Prepared and compacted hard standing to assist in controlling any excess water infiltration,
- Permitted/specified wastes being stored, where appropriate within an enclosed container/skip located upon a hard standing area.

### **5.6.4 Surface water management**

Waste recovery, recycling and unloading operations will be performed upon impermeable areas. These will be laid with a slight fall (as indicated), which will thus collect any surface water run-off and divert it towards the site collection/drainage system and subsequent collection within the interceptor/sealed tanks. Where any contamination and thus potential pollution may occur, absorbent materials will be applied in order to reduce the potential for excess volumes of fluids entering the site drainage. The water collection/drainage can be observed upon the plan/drawing within the appendices.

On a monthly basis, from experience, and more often during other periods such as adverse weather conditions site operatives will inspect the storage tanks/interceptor and arrange removal of residual materials and cleaning of the traps. This will be recorded and monitored within the site diary record form.

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## **APPENDIX A**

### **Location plan**

## **APPENDIX B**

### **Site plan/drawing**

## **APPENDIX C**

### **Risk assessment**

## **APPENDIX D**

### **Permitted wastes**

## **APPENDIX E**

### **Site diary/inspection/record form**



## **APPENDIX F**

### **Accident/Emergency plans**

## **APPENDIX G**

### **Exempt activities**

## **APPENDIX H**

### **EMS Record Forms**

