


Tazrock Ltd

**Environmental Management System (EMS)**

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Signature:		Gareth Danter-Hill
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## **Introduction**

The EMS produced for site is designed to enable the permit and the activities undertaken within the parameters of it; to be compliant with all relevant Environmental legislation. Where appropriate Best Available Techniques (BAT) will be adopted on site to ensure that the environment and human health are protected.

This EMS is only applicable for the permit applied for and includes all activities covered within. The following documents were used as to aid the formulation of this management system and the associated documents. The standards outlined within these documents will be adhered to throughout site operations:

How to Comply, SGN5.06, H1 guidance and the WRAP aggregate QP.

## **Environmental Policy**

Tazrock Ltd and its staff are committed to minimising its impact on the environment. The company recognises that environmental issues are of vital importance to a successful and responsible business programme.

All business operations are done with clear regard to environmental issues; where possible, the impact of operations at site are undertaken to minimise all impacts on the environment.

Consequently, the company is committed, through a process of continual improvement that will aim to prevent pollution and minimise the environmental impact of all operations while improving performance.

In line with this commitment the company has a general policy of:

- Complying with all relevant legislation, customer and internal requirements
- Setting environmental objectives and targets that are reviewed regularly
- Undertake environmental risk assessments where required
- To minimise energy usage
- To re-use, segregate and recycle material where possible to achieve the best environmental outcome
- To undertake regular internal audits
- To review and revise this policy frequently to maintain effective working practices

The company will ensure that this policy and its objectives are understood, implemented, and maintained. This will be to achieve continuous improvement and lead to the progressive development of this Environmental Management System.

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### TCM

The TCM for this permit will initially be an external environmental consultant, Gareth Danter-Hill of Environmental Focus Ltd. He has successfully completed the course for WAMITAB Level 4 High Risk Operator Competence for Non-Hazardous and Hazardous Transfer and Treatment (HROC6). Continuing Competence certificated have been achieved for both hazardous and non-hazardous transfer and treatment of waste. Once an in house TCM is qualified, Environmental Focus Ltd will continue on an advisory basis.

### Site Plans

The extent and layout of the permitted operations are as shown within the plan as submitted with the application. If the activities on site vary or alter significantly from those identified within the drawing, a review will be undertaken, and an updated site plan will be created.

### Restrictions

The activities shall, where possible, not be carried out within:

- (a) 50m of any well spring or borehole used for the supply of water for human consumption. This must include private water supplies.
- (b) 250 metres of the presence of Great Crested Newts, where it is linked to the breeding ponds of the newts by good habitat.
- (c) a specified AQMA.
- (d) 50m of an area that is subject to a specific Biodiversity Action plan that NRW considers at risk by the permitted activities.
- (e) 10m of any watercourse.
- (f) 50m of a National nature reserve, local nature reserve, Local Wildlife site, Ancient Woodland or Scheduled ancient monument.

At present, the Operator is just within the 500m boundary of the nearest SSSI. Therefore, a Standard permit cannot be applied for. This application is subsequently bespoke.

### IED implications

Due to the nature of the waste currently being applied for, the wastes to be accepted at site and the treatment processes to occur; it is not foreseen that the IED is a relevant consideration. Should this change in the future due to amendments to the Legislation etc., Tazrock Ltd will address the requirements at this stage proactively.

## Site Operations

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For all waste accepted on to the facility full upstream checks are to be carried out before new waste types or suppliers are to be allowed to import waste on to site.

#### Pre-acceptance Procedures

The pre-acceptance procedures adopted at the site are in accordance with the Sector Guidance Note 5.06 section 2.1.1 where appropriate. To ensure that unsuitable wastes are not accepted onto site, the senior management team will be used to ensure that the materials to be delivered are suitable to be recovered on site. This will be done by checking that the waste to be delivered firstly is coded correctly and secondly whether the EWC code is on the list of permitted wastes at site. The site management will also determine whether the waste is likely to be contaminated. This assessment will firstly by review of chemical data attributed to the material by the waste producer. The assessment will determine whether coal tar is present in the material based on BaP levels. Where the concentration of benzo[a]pyrene is at or above 50 ppm (mg/kg) in the black top alone (excluding other material) then the amount of coal tar should be sufficient (0.1% or more) for the material to be hazardous and thus coded 17 03 01\*. If it is deemed that the wastes are not suitable to be recovered on site; they will not be accepted.

A pre-acceptance screening procedure will be used to ensure that the wastes that are being proposed for delivery comply with firstly the requirements of the environmental permit held and secondly, whether the wastes are suitable to be recovered. This process will involve a review of information from the waste producer which may include representative samples of the waste being brought to site before bulk loading inputs.

All waste deposits to be utilised within the treatment process will therefore be pre-booked for acceptance to site.

On arrival all wastes will be visually checked to confirm that they meet the description and EWC assigned by the waste producer. If not, they will not be accepted on to site for any recovery operation and will either be returned to the waste producer or quarantined on site.

Pre-booked deliveries will have to have the following information assigned to them:

- The EWC code assigned for the waste.
- Chemical analysis (if required) and composition of the waste.
- Quantity of waste to be delivered.
- Any hazards within the waste.
- Contingency plans for non-conforming waste should the need arise.

It is not anticipated that wastes from companies outside of the control of regular contracts are to be accepted at this stage, however, on occasion this may be acceptable if the waste meets the above pre-acceptance criteria. The wastes will still undergo full inspection at the site and will be directed away from any source segregated materials avoiding cross contamination. These wastes will then be visually checked by the management team via on site checks before being incorporated into any further recovery projects.

Testing of feedstock supplies will identify the following when required:

- Nature of the waste and how it has arisen
- Any variations in the feedstock
- Inhibitory values in the feedstock
- Biodegradability of the feedstock

Wastes should not be accepted at the installation without a clear method or defined treatment and disposal/recovery route with a full costing.

#### Acceptance procedures

All wastes that are received are both visually checked when excavated and when tipped off.

Duty of care paperwork is checked by the operative in the vehicle delivering to ensure that the waste is compliant with the EWCs on the permit of the site. It may be the case, as with some local authorities/large projects that a season ticket is used for wastes that are repeat loads.

All vehicles that are depositing materials onto site will be directed to the most appropriate waste reception area by the foreman on site (please traffic management plan for site). When the load is tipped off, the contents are visually checked for contaminants and to see if the waste matches that described and coded on the accompanying transfer note.

Due to the nature of the waste and how it is collected, there is inevitably going to be a certain amount of contamination in the waste. For example, materials such as wood, metal and plastic will remain in the wastes. To remove these contraries a picking operative has been employed on site and the material will be processed in order to remove all contaminants before being batched for onward processing.

Waste will then be stored in the appropriate bay awaiting the batching and screening process.

For all loads received, a detailed record is kept that will contain the following information:

- Description of waste
- EWC code
- Date and time of delivery
- Weight of load
- Waste carrier registration number

A monthly and quarterly log is kept (for waste return purposes) of all waste that is accepted at site. This log is checked each month, this ensures that the permitted tonnage will not be breached. If this figure is reached, then waste rejection procedures (detailed below) will be initiated to remain compliant on site.

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The information to be retained and used as part of the batching process will include all information obtained during pre-acceptance, acceptance, storage, treatment and/or removal off-site.

These records will be kept in the site offices in dedicated files so that inspection of loads can be simply carried out.

The tracking system should operate as a waste inventory/stock control system and include as a minimum:

- date of arrival on-site
- producer details
- all previous holders
- a unique reference number
- pre acceptance and acceptance analysis results if required
- package type and size
- intended treatment/disposal route
- record accurately the nature and quantity of wastes held on site
- where the waste is physically located in relation to a site plan
- identification of operator staff who have taken any decisions re acceptance or rejection of waste streams and decided upon recovery / disposal options

The adoption of such a tracking system will allow for accurate figures with regards current storage and treatment tonnages on site at any one time to be provided. However, deviations from the above may be possible as the site will adapt the tracking system to allow for efficiency improvement to be made.

#### Rejection procedures

Waste shall only be accepted at site if it conforms to the list of permitted wastes and if it conforms to the written description of the waste producer.

If, in the unlikely event a waste is accepted onto site that does not comply with the above then the usual site rejection procedures will be enforced:

- The waste will be separated from any other wastes currently on site and will be stored on an impermeable surface that benefits from sealed drainage (if deposited).
- The driver of the load will be instructed to return the load and provided will detailed reasons as to why the load has not been accepted at site (if not deposited).
- NRW will be informed of the non-compliant load and sent a copy of the on-site log of the activity that will detail the origin and carrier of the load.

#### Quarantine procedures

Tazrock Ltd will identify a dedicated bay for any wastes that require to be quarantined. The reasons may be due to contamination within the material or that the waste does not match the EWC code attributed to it and therefore may not be a permitted waste under the permit held.

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NRW will be notified of the acceptance and quarantine of the material as well as any actions that are being taken for its removal; inclusive of timescales.

For all wastes that have been quarantined a full investigation will be undertaken by senior management to understand the reasons for the acceptance and to ensure that the incident is not repeated. This report will be shared with NRW if required.

Any waste material that has been quarantined will be removed from site within 7 days of its acceptance. If the material is thought to be hazardous (physical contamination i.e asbestos, Knotweed etc), this timescale will be reduced and the temporary storage of the material pending disposal will need to be approved with NRW.

If chemical analysis is required to correctly classify the waste, then the material may be stored on site for longer than this period. The laboratory generally has a 10-day turn around on chemical soil analysis.

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### **Permitted Wastes**

The following waste types are applied for to be permitted for acceptance on site. The throughput per year is to be limited at 100,000T; the site shall not accept any liquid waste, any hazardous wastes or that mainly consist of dusts, powders, loose fibres:

<b>EWG Code</b>	<b>Description</b>
<b>17</b>	<b>CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)</b>
<b>17 03</b>	<b>Bituminous mixtures, coal tar and tarred products</b>
<b>17 03 02</b>	bituminous mixtures other than those mentioned in 17 03 01

### **Operational Procedures**

#### **BAP wastes**

BAP (Bituminous aggregate product) will be delivered to the site and stored in an unprocessed stockpile of up to approximately 25,000T on an area of hard standing. The operator has mobile screening equipment that are used specifically for the purpose of treating inert and excavation type wastes.

The plant will be used to screen approximately 1000 – 2000 tonnes of material per month to provide a range of graded products suitable for re-sale. The treated materials will be stored on hard standing or concrete in separated stockpiles. Stockpiling of materials will not be done for prolonged periods of time as these materials are readily required for use on construction jobs at a high turnaround.

All plant that is to be used on site for the screening of this type of waste material are fitted with water hoses that can be activated if required during periods of dry weather. This will act as a dust suppression system should the need be required. In addition to this, the operator has access to a road sweeper. This is used regularly on other quarry sites to ensure that any dust on concreted areas and roadways is cleaned up preventing dust becoming a nuisance. The sweeper is also used to clean the local highways and haul roads if required.

#### **Contaminants in material**

Virgin timber (such as tree stumps and branches with minimal green matter) can be produced from site clearance works. This is not classed as a waste, but it will be brought to the site and stored separately to other materials – this material is removed from site frequently and doesn't get kept for periods longer than 2 weeks due to space constraints within the site boundary.

Wood wastes (if found in the products received) will be stored in an open skip towards the front of the yard awaiting removal and onward processing at another facility licensed to accept it. No further processing of the wood waste will be undertaken on site at present other than the manual picking and segregation of the wood from the materials if contaminants are seen.

There will also be skips on site for materials such as metals, plastic, general wastes and plasterboard if required. This material can be found in some of the incoming wastes as physical contamination



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that will need to be removed before the tarmac processed further for resale. The material is hand-picked and each of the contaminant materials are segregated and stored in separate skips on site pending collection and onward processing.

#### Screening procedures

The screening of the bituminous materials is undertaken when sufficient material is stockpiled on site to make the process commercially viable. Outlet for the recycled products have already been gained through contracts.

#### **Monitoring and Emissions Regime**

There are many different potential sources of emissions resultant from the treatment of wastes. For the activities at site the main areas/processes where emissions could occur are:

- Waste reception
- Screening
- Product storage
- Loading

Mitigation measures and corrective actions to eliminate and firstly to prevent emissions are detailed in the attached dust management plan produced by Tazrock Ltd, but are summarised in the management system. The systems adopted on site to reduce emissions can be used for several other areas of emission release.

As part of the management of the facility a monitoring programme will be used to ensure that no emissions that could either cause a nuisance to local receptors or harm to the environment and/or human health will be released. The emissions that will be monitored throughout the operation of the facility are:

- Water discharges
- Dust
- Noise and vibration

There will be no point source emission directly associated with any activity as infiltration will be the main element of water drainage for the site.

#### Water Discharge

There is no outlet for any surface waters to flow from the site. The site is made of areas of hardstanding allowing for natural infiltration of waters on the site to occur. If the hardstanding on site becomes severely compacted this may prevent the surface waters from infiltrating into the ground. If this does occur the management of the site will firstly, excavate the material that has been compacted and secondly, replace the hardstanding with new, clean aggregate that will allow for the free draining of liquid to occur on site once more.

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In addition to this, as the site is not flat the water that falls on site may flow off the edges and therefore off the permitted area. To prevent this escape of water the site is in the process of creating an earth bund around the permitted area to prevent any water escape. This will consequently result in the water that has been in contact with waste operations being unable to leave site laterally.

Monitoring will continue in line with current permit requirements.

#### Dust and litter

Emissions may arise in the form of dust from the activities or resultant from vehicle movements and treatments associated with the process. Dust formation from the process itself generally occurs in material with moisture content lower than approximately 30%.

Regular visual monitoring of the material will help in the reduction of dust emissions as there will be water on site should conditions become too dry. Daily checks for dust will be carried out as part of the maintenance/inspection checklist annexed to this report. The initiation of dust suppression techniques including water mists and sprays could be adopted on site, in particular the damping down frequently during in dry weather. Each item of plant used for the treatment of aggregates are fitted with water sprays to help with the reduction of dust creation.

A street cleaner can also be stationed near to the site to allow for direct clean-up of the roadways on site should dust become an issue.

Water suppression can also be used in the form of spray cannons or similar when the drier material is being unloaded if required. This is also the case of stockpiled material.

If dust becomes a wider issue through complaints received, frisbee monitoring will be undertaken to ascertain the severity of the issue and an improvement plan will be initiated to reduce the dust emissions. A dust monitoring programme will be created to align with the severity of the issue depending on the outcome of the frisbee monitoring.

#### Litter

Litter will be monitored and cleaned up as per the requirement of the checklist annexed to this report. A site operative will monitor any wind-blown materials on site. Any material of this nature that has left the site boundary will be picked and collected daily to ensure that any waste that has blown out of the site does not remain an issue. If this does become a regular problem across the site, then Tazrock Ltd will consider installing netting to catch any litter being blown before it leaves the site. However, due to the nature of the wastes to be accepted, litter is not foreseen to be an issue.

#### Noise and Vibration

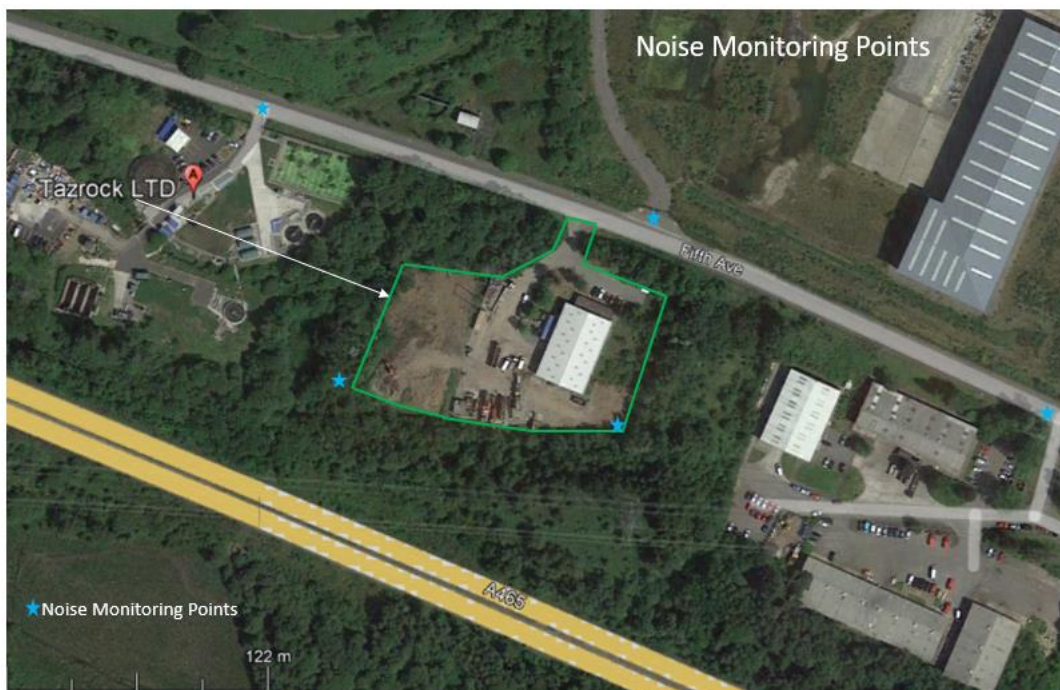
Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of NRW. The majority of proposed operations do not generate excessive noise and vibration which may be a nuisance to nearby residents. This is particularly the case for Tazrock Ltd as the surrounding area is largely industrial as the site sits within an established and large industrial estate.

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The screening operations using mobile plant, brought to site, are those which will generate the greatest level of noise and vibration. The plant will be located in an area of the site that is surrounded by trees and hedges. To minimise the escape of noise outside of the site boundaries, there is a bank of trees surrounding the perimeter of the site and an earth bund will be constructed between the equipment and the perimeter of the site nearest to the receptors. The equipment will be maintained and used in accordance with manufacturer recommendations to avoid excessive noise and vibration. The plant will only be operated during normal working hours only to avoid any noise during evenings and night times.

It is not anticipated that site operations will be cause a noise nuisance because of the scale of operation (as identified within the NIA submitted), therefore no active monitoring for noise will be undertaken. The site has been planned to ensure the best practicable means would be always employed on site to ensure that all plant and equipment does not produce excessive noise audible beyond the site boundary. For example, drivers will be encouraged not to leave plant idle, operators will reduce drop heights, tailgates on the waste deposit trucks will be fitted with rubber seals to prevent banging upon waste reception and speed limits will be used to reduce the revving of engines on site.

If, however, noise becomes a wider issue through complaints received directly to the site, detailed monitoring will be undertaken (locations detailed below) to ascertain the severity of the issue and an improvement plan will be initiated to reduce the noise emissions if required. A noise monitoring programme will be created to align with the severity of the issue depending on the outcome of the monitoring. A new NIA will be undertaken by a suitably qualified professional and any actions required within the assessment to reduce noise levels will be actioned.



The first stage of the procedure would be to validate any complaint received through physical monitoring in the locations seen above. Once substantiated if the levels of noise are significant or persistent then a new NIA would be completed by a specialist contractor. If the report highlights an

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issue, then Tazrock will implement whatever actions detailed within the report to ensure that noise levels are reduced to within acceptable levels (for example the installation of acoustic fencing).

The noise monitoring will continue to be undertaken until all recommended actions have been completed. The monitoring rounds will be done every other hour, throughout the operational period of the plant (if the screener was the cause of the noise issue but was non-operational for a day, then no monitoring will be undertaken). If noise is noted at the monitoring locations it will be recorded in the site diary as well as the wind speed and direction.

Depending on the nature of the complaint, it may be possible for Tazrock to remedy the cause of the complaint without the need for a second NIA. For example, if the nature of the complaint was related to reversing beepers, then the company would install 'white noise' reversing alarms to replace the beeping type in an attempt to reduce noise levels.

### **Other monitoring parameters**

#### **Control of pests**

It is unlikely that vermin will present a problem because of the waste types handled at the site but a recognised pest control contractor will be brought in if any problems are encountered. The site will be inspected weekly for the presence of vermin and the results of the inspection noted on the site inspection form.

#### **Control of mud and debris**

The surfacing of the operational areas of the site with a compacted hard-core surface and concrete increases the risk of mud flow during wet weather. The use of the road sweeper on site and the storage of waste within the bays significantly reduces the risk on the approach roads or public highway. The deposit of material on the public highway will be treated as an emergency and will be cleaned with a mechanical vacuum sweeper. No wheel cleaning facilities are proposed at the site. The waste types handled on site and the fact that the long site access road is surfaced with concrete reduces the likelihood of mud or debris being carried onto the highway.

### **Permitted Operations**

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The activities to be undertaken on site are in accordance with the requirements set out within the permit. The site is permitted to undertake the following activities:

<b>Table 2.1 activities</b>	
<b>Description of activities</b>	<b>Limits of activities</b>
<p><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)</p> <p><b>R13:</b> Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)</p> <p><b>D14:</b> Repackaging prior to submission to any of the operations numbered D1 to 13</p> <p><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</p> <p><b>R3:</b> Recycling/reclamation of organic substances which are not used as solvents</p> <p><b>R5:</b> Recycling/reclamation of other inorganic materials</p>	<p>Treatment consisting only of manual sorting, separation, screening of waste into different components for disposal, (no more than 50 tonnes per day) or recovery.</p>

The rest of the yard is constructed with compacted hardcore materials. This allows for the free draining of all surface waters on site to naturally infiltrate the ground. A structured maintenance schedule of this area is operational allowing for the excavation and re-construction of the hardstanding using fresh aggregate materials. This will only be done when the surface has become so compact (by the repeated use of heavy plant) that the surface water is being prevented from draining away.

An engineered earth bund is currently being constructed around the permitted area to maintain the site boundary. This will delineate the permitted area from the rest of the area and act as a sound barrier also. The bund will not be constructed to a height of greater than 3m and will be made of materials that will prevent any surface waters from flowing out of the permitted area.

### **Incident Plan**

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The site is only permitted to accept non-hazardous (inert) wastes and so the risks of contamination are very low.

The following list those items which require particular attention: -

#### Breakdowns and spillages

In the event of breakdown of the loading plant an alternative loading shovel or excavator will be brought on site until it is repaired. If an alternative machine cannot be used, then waste will be stored until the plant is repaired.

In the event of a long term breakdown of the loading plant an alternative machine will be brought on site until the faulty unit is repaired. Any spillages of fuel will be cleared immediately by depositing sand or other absorbent materials on the affected area. The sand or absorbents will be placed in a sealed container or skip to be taken to a suitably licensed site for disposal. All spillages of waste and windblown litter will be cleared by the end of the working day in which they occur where practicable.

All staff are trained to be able to identify a spillage quickly and initiate clean up and containment procedures as soon as possible to limit and impact on the environment.

Fully equipped spill kits are held on site and in the sites head office (on site) should they be required to be used quickly to prevent any pollution leaving the site boundary or causing harm to the environment.

#### Drums and other containers

The deposit of drummed waste will not be allowed at the site. If a drum is concealed within a load of material delivered to site and is not observed until the lorry is emptied onto the raw material stockpile then the following procedures will apply:

- 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.
- The site manager will be contacted to verify the observations and to decide on further action.
- The producer of the waste and NRW will be contacted for advice and further information.
- If safe to do so, the waste will be quarantined in a safe location on site away from all other wastes and out of the way of staff and plant.
- All spillages will be cleared using a spill containment kit and all contaminated absorbents placed in a sealed container or skip for disposal to a suitably licensed waste management site.
- 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 brought in to assist. Staff will be evacuated from the transfer area to a safe area away from the hazard if required or advised to do so.

#### Fire

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All areas across both the operational yard and the sites offices that are operated by Tazrock Ltd are fully equipped with the most appropriate and correct fire extinguishers. These are tested and maintained by an approved contractor annually. Training will be provided to all site staff by a suitably qualified person to ensure that all staff are able and competent in the use of the extinguishers.

Additionally, when fully operational, the site has a water bowser stored on site for quick action fire-fighting operations if required. The bowser has a capacity of 1000l.

The waste types that are accepted on to the site are not of high risk as far as fire is concerned. However, there may be contaminants within the loads that require picking and segregating from the inert materials and this will be stored in skips pending collection. This waste does pose a threat of fire.

## **Reporting**

NRW are the regulating authority for the area in which Tazrock Ltd operate. All reporting needs to be submitted to NRW for activities occurring under the control of the permit.

Waste returns data will be submitted within 30 days of the last day of the preceding quarterly period as detailed below:

- January to March figures will be reported before the end of April,
- April to June figures will be reported before the end of July,
- July to September figures will be reported before the end of October, and;
- October to December figures will be submitted before then of January the following year.

Any emissions or incidents that are not permitted and may impact upon the environment of human health will be reported to NRW as soon as possible to allow them to be fully aware of the situation and to take the appropriate action is required to limit the impacts.

## **Complaints**

Any complaints received at the Site, e.g. about noise or dust, is reported to the Site Manager who is responsible for the day to day operations.

The following actions are taken on receipt of an external complaint:

- The responsible person receiving the complaint at the Site will immediately record the key details, initiating the investigation process. Details will be entered on a Complaint Report Form. The form sets out the key information that should be recorded at this time in order to facilitate further suitable investigation.
- The Site Manager or other Technically Competent Person will be informed of the complaint as soon as possible, including the location, time and date of the complaint being lodged (where available).

In recognising that some causes of complaints, such as dust and noise, can be transient and short-lived, timely notification of complaints directly from the complainant or Natural Resources Wales is imperative to allow for appropriate investigation. If the complaint occurs more than 12 hours before



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notification is provided to the Operator, it may not be possible to substantiate the complaint or pinpoint the cause. The Operator will, however, contact the complainant where possible, review any operations at the time which had the potential to cause the complaint and complete and record a comprehensive complaint investigation. For complaints received within 12 hours of the incident the following actions will be undertaken:

- The Site Manager or other Technically Competent Person will visit the complaint location as soon as possible, with the aim of undertaking monitoring within 2 hours if this is possible within the working day. The Site Manager or other Technically Competent Person will subjectively determine the presence or absence of the cause of the complaint, e.g. visible dust presence or source and level of noise. Opportunities to meet the complainant to discuss the matter directly will be pursued, wherever possible.
- If the cause of complaint, e.g. visible dust or noise, is present, the key 'FIDOR' criteria will be assessed at the complaint location, as follows:
  - Frequency – is the cause of the complaint, e.g. dust or noise, intermittent or persistent; is there a history of complaints at this location?
  - Intensity – is the cause of complaint faint, moderate, strong, or very strong?
  - Duration – how long is the cause of complaint present at this location?
  - Offensiveness – provide a description of the cause of complaint; is it high, moderate, or low offensiveness?
  - Receptor sensitivity - is the cause of complaint present at a remote or highly sensitive location; is it localised or widespread?

The Site Manager or other Technically Competent Person will subsequently undertake the following further assessment process:

- Review of the operations at the Site prior to and at the time of the complaint;
- Review of the environmental control systems prior to and at the time of the complaint;
- Review of the meteorological conditions (wind speed, wind direction, rainfall, atmospheric pressure) prior to and at the time of the complaint – to establish whether a pathway can be established between the Site and the complainant;
- Review of the previous complaint history at the location identified.

Where a significant complaint is substantiated by the Site Manager or other Technically Competent Person, the Operator will contact Natural Resources Wales to discuss the incident as soon as possible following receipt of the complaint details, allowing sufficient time for the above investigation to be completed, and within a maximum target response period of 24 hours from complaint receipt. If the necessary contact details are available and direct feedback has been requested the Operator will also contact the complainant directly to discuss the issue, the findings of the subsequent investigation, and any actions arising.

Once actions have been completed the Site Manager or other Technically Competent Person will visit



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the complaint location to ensure that the cause of complaint has subsided.

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**Annex List***Maintenance/inspection Checklist***Week Commencing:**

Area to Inspect	Frequency	Mon	Tue	Wed	Thur	Fri	Sat
Discharges off site	Daily						
Site security	Daily						
Fires	Daily						
Plant/equipment	Daily						
Litter	Daily						
Dust	Daily						
Noise	Daily						
Mud on highway	Daily						
Odour—if required	Weekly						
Vermin	Weekly						
Fuel tank	Weekly						
Hard standing areas	Weekly						
Drainage of site	Weekly						
Waste composition	Monthly						
Spill kit contents	Monthly						
Waste quantities on site	Quarterly						

**Inspection Completed By:****Date:****Time:****Signature:**

If any defects are noted within the maintenance checks then they will be identified and logged through the defect reporting sheet below.

The defect reporting sheet will be passed to the manager for the site to implement a mitigation action report.

The mitigation action report will highlight the works that are required to be undertaken to fix the defect. The report will also aim to eliminate any environmental impact that may have, or could potential result from the noted defect.

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*Defect Report Sheet*

Defect Assessment Reference	Date	Description	Environmental Impact	Permit condition breached	Management notified

Assessment undertaken by:	Management member contacted:
Date:	

Tazrock Ltd

*Mitigation Action Report*

Report Completed by:	
Date and Time:	

Responsible member of management:	
Defect Assessment Report Reference:	
External Complaint Reference Number (if applicable):	
Defect Description:	
Cause of Defect:	
Environmental Impacts:	
NRW contacted:	
Further Action Required on Site?	
Corrective Actions Undertaken:	
Complainant Contacted by:	
Defect Eliminated at Site:	
Permit condition(s) breached:	

Defect Closure completed by:	
Date and Time:	