BYASS WORKS WASTE TRANSFER FACILITY

ENVIRONMENTAL ACCIDENT MANAGEMENT PLAN (EAMP)

Report Number 2099r8v1d1022

Site Location:
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1 BACKGROUND

AWD Recycling Ltd (AWD) recycles waste at Byass Works, Briton Ferry (see Figures 1 and Figure 2). The operation is focused on the processing of hard plastics, UPVC, skip waste from window construction companies, paint tins and roll grinding solids. The operation enables the waste to be recovered aiding the development of a circular economy in Wales.

The operation is permitted under a Permit issued by the waste regulator Natural Resources Wales (NRW). One of the conditions of holding such a Permit is that a written environmental management system (EMS) must be in place. As part of this EMS, this EAMP sets out how AWD will deal with any incidents or events that could result in:

- Pollution or
- Breach of Permit

1.1 Scope of EAMP

An Environmental Management System (EMS) is a structured system which, once implemented, helps an organisation to identify the environmental impacts resulting from its business activities. It also helps manage and reduce those impacts, so that the environmental performance of the organisation is improved. An EMS should provide a methodical approach to planning, implementing and reviewing an organisation's environmental management during normal and abnormal conditions. For this reason the EMS is informed by an Environmental Risk Assessment (ERA) and this EAMP. This document should therefore be used alongside all of the other aspects of the EMS and Management Plans.

This plan identifies foreseeable potential accidents and evaluates the likelihood and consequences of the accident happening. This allows the overall risk to be identified. Based on these assessments, the plan then sets out the measures AWD will integrate to the EMS and day-to-day operation to avoid the accident happening in the first instance and the magnitude of any impact should the accident occur.

Central to the EMS is a set of Procedures and Standard Forms which will assist with the operational performance and recording of waste processing and environmental protection. Ultimately, these records may be used to support Permit surrender. The procedures and forms are included in this EMS with those directly relevant to the EAMP signposted and reproduced in Appendix 1 and 2.

2 METHODOLOGY

The assessment is based on identifying plausible risks through the use of a tabulated conceptual model based upon the conventional source (hazard)–pathway–receptor model. The approach enables the pathways via which human, environmental and infrastructure receptors may be exposed to hazards during an accident. If one element of the source – pathway – model does not exist there is no risk. If a pathway exists that potentially links the hazard to the receptor, then there is a risk that requires evaluation, management and potentially mitigation.

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For each plausible exposure pathway identified, the probability and consequence of the event occurring has been qualitatively evaluated. The overall magnitude of risk associated with an exposure pathway is the product of the probability and the consequence associated with the event. Therefore, the overall magnitude of risk can be summarised as follows:

Magnitude of Risk = Probability X Consequence

In order to assess each pathway, the magnitude of the consequence (i.e. severity) and the magnitude of the probability (i.e. likelihood) has been determined. To ensure this process is transparent and repeatable the terms used to define the magnitude of the consequence and probability is defined in Table 2-1 and Table 2-2.

Table 2-1 Classification of Consequence

Classification	Definition
Severe	Equivalent to Category 1 Pollution Incident. Major, serious, persistent and/or extensive impact or effect on the environment, people and/or property.
Medium	Equivalent to Category 2 pollution incident. Significant impact or effect on the environment, people and/or property.
Mild	Equivalent to Category 3 pollution incident. Minor or minimal impact or effect on the environment, people and/or property.
Minor	No measurable effect on humans. Equivalent to insubstantial pollution incident. with no impact.
Uncertain	Further assessment potentially required to evaluate exposure pathway.

Table 2-2 Classification of Probability (Likelihood)

Category	Definition
High	There is pollutant linkage and an event would appear very likely in the short-term and almost inevitable over the long-term, or there is evidence at the receptor of harm or pollution.
Medium	There is pollutant linkage and all the elements are present and in the right place which means that it is probable that an event will occur. Circumstances are such that an event is not inevitable, but possible in the short-term and likely over the long-term.
Low	There is pollutant linkage and circumstances are possible under which an event could occur. However, it is by no means certain that even over a long period such an event would take place and is less likely in the shorter term.
Very Low	There is pollutant linkage but circumstances are such that it is improbable that an event would occur even in the very long-term.
Uncertain	Further assessment potentially required to evaluate exposure pathway.

For each exposure pathway the overall magnitude of risk is defined by the product of the probability and consequence as shown in Table 2-3. The risk categories are defined in Table 2-4.

Table 2-3 Classification of Risk

		CONSEQUENCE			
		Severe	**Medium**	**Mild**	**Minor**
PROBABILITY	**High**	**Very high risk**	**High risk**	**Moderate risk**	**Low risk**
	Medium	**High risk**	**Moderate risk**	**Low risk**	**Low risk**
	Low	**Moderate risk**	**Low risk**	**Very Low risk**	**Very low risk**
	Very Low	**Low risk**	**Very Low risk**	**Very low risk**	**Very low risk**

Table 2-4 Description of Risk Classes

Very high risk	There is a high probability that severe harm could arise to a designated receptor from an identified hazard at the site without further intervention.
High risk	Harm is likely to arise to a designated receptor from an identified hazard at the site without further mitigation.
Moderate risk	It is possible that harm could arise to a designated receptor from an identified hazard. However, it is either relatively unlikely that any such harm would be severe, and if any harm were to occur it is more likely, that the harm would be relatively mild.
Low risk	It is possible that harm could arise to a designated receptor from identified hazard, but it is likely at worst, that this harm if realised would normally be mild
Very low risk	It is a low possibility that harm could arise to a designated receptor, but it is likely at worst, that this harm if realised would normally be temporary mild or minor.
No potential risk	There is no potential risk if no pollution linkage has been established.

3 ASSESSMENT OF FORESEEABLE ACCIDENTS

3.1 Evaluation of Current Risk Profile

Accidents, incidents and their consequences are not always foreseeable. For this reason, the EAMP will be subject to annual review and internal audit in line with the EMS documentation. At this stage the events evaluated are tabulated in the matrix presented in Table 3-1. This will need to be reviewed following any accidents or incidents that either cause pollution, lead to breach of the Permit or result in a 'near miss' within this context.

Taking into account the mitigation measures to be implemented the current assessment indicates that even under abnormal conditions there should not be any significant environmental impacts or Permit breaches from the accidents evaluated. This is because the site layout, Management Plans and procedures are aimed at ensuring that the operation does not pose an unacceptable risk to the environment and that the operation is undertaken in accordance with the Permit. Some of the key measures to be implemented are discussed further below.

3.2 Site Layout

The site layout is shown in Figure 2.

The site layout provides sufficient space with clear external lines of sight for vehicles to safely enter and leave the site. This minimises the risk of collision and contact between vehicles, human and infrastructure. Any new drivers are inducted and each load delivered is monitored by a trained AWD banksman.

The site layout separates the different wastes into concrete bays. With the maximum storage capacity of each bay labelled this minimises the opportunity for large stockpiles developing which helps ensure compliance with Permit conditions and reduction of risk from incidents such as fires. Dedicated quarantine areas are also provided, either as open spaces away from other wastes or within mobile empty skips available in all site areas.

Also shown on Figure 2 is the location of oil and fuel stored in drums for use in on-site plant.

Site drainage is shown on Figure 3.

Table 3-1 Accident Risk Evaluation Matrix

Source	Pathway	Receptor		Risk Evaluation		
What could go wrong?		**Who / what could be impacted**	**Mitigation Measures**	**Likelihood ranking**	**Consequence ranking**	**Overall Risk**
Vehicle collision / failure	Leakage of fuels / oils	Land, groundwater and / or surface water	All plant / vehicles subject to preventative maintenance. Traffic management aimed at circular routes and one-way systems. Spill kits available on site and in vehicles. Daily checks to ensure all areas free of loose debris.	Low	Medium	Low
	Physical impact / damage	Infrastructure and property		Low	Medium	Low
	Fire	Environment, humans, infrastructure		Low	Medium	Low
Receipt of non-conforming waste or hidden contraries such as lithium batteries	Reaction leading to fire / waste stream contamination	Environment, humans, infrastructure	Pre-acceptance and acceptance procedures in place. Personnel trained to spot and manage contraries.	Low	Medium	Low
Storage failure	Collapse of storage / escape of waste	Environment, humans, infrastructure	All infrastructure subject to preventative maintenance and inspection.	Low	Mild	Very Low
Excess waste on site	Escape of waste and change to risk profile	Environment, humans, infrastructure	Weighbridge allows waste mass to be measured. Marked bays limit waste storage. Quarantine always available.	Low	Medium	Low
Power failure / plant shutdown	End of processing	Site operations and potentially customers	Contracts in place with other facilities for diverted waste or waste that cannot be processed. Quarantine capacity always available. Site would be temporarily closed.	Low	Medium	Low
Extreme weather	Extreme temperature / wind / rainfall	Environment, humans, infrastructure	Site would be temporarily closed / activities limited depending upon conditions.	Medium	Medium	Moderate
Operator error / equipment failure	Build-up of untreated waste and change to fire risk profile	Site operations and potentially customers	All personnel trained and Preventative Maintenance programme in place. Contracts in place with other facilities for waste that cannot be processed. Quarantine capacity always available.	Low	Mild	Low

Source	Pathway	Receptor		Risk Evaluation		
What could go wrong?		**Who / what could be impacted**	**Mitigation Measures**	**Likelihood ranking**	**Consequence ranking**	**Overall Risk**
Flooding	Rising waterlevels / poor drainage leading to localised inundation	Humans and infrastructure on site	Site is in low risk area. AWD management registered with flood line. Emergency procedures in place.	Low	Medium	Low
	Washing of waste off-site	Environment		Low	Medium	Low
Trespassing / Vandalism	Arson causing fire / spillage	Environment, humans and infrastructure	Security fence, 24/7 motion sensitive monitored CCTV and automated beam detectors in place. All alarms and perimeter fencing to be subject to routine inspection and preventative maintenance. FPMP and EAMP to be implemented. Spill kits available.	Low	Medium	Low
Fire	Fire damage, release of airborne pollution and fire water run-off	Environment, humans and infrastructure		Low	Medium	Low
Spillage, leakage or loss of containment	Leakage of polluting fluids and infiltration to land	Land, groundwater and / or surface water	As above. Most waste dry and stored on concrete. No direct link to groundwater / surface water. Bunded storage provided for oil / fuels. Emergency procedures in place. Spill kits available including sand bags and booms.	Very Low	Low	Low
Infestation	Pests leading to nuisance (on-site and off-site)	Environment, humans and infrastructure	Strict waste acceptance and housekeeping measures to be implemented. Waste not likely to be attractive to pests.	Low	Low	Low
Noise	Abnormal noise	On-site personnel and local human population	Noise Management Plan in place. All personnel to be vigilant for changes in noise levels.	Low	Medium	Low
Odour	Abnormal odour	On-site personnel and local human population	Odour Management Plan in place and personnel trained. Rigorous waste acceptance and storage inspections.	Low	Medium	Low
Litter / mud	Escape of light fraction waste / mud	Local road network, environment and humans	Waste activities not a significant source of light fraction waste. All areas to be subject to daily housekeeping checks.	Low	Mild	Very Low

3.3 Spill Kits and Emergency Grab Pack

Within the staff parking area, a secure box will contain a copy of this plan and also the Fire Plan. NRW and FRS will have coded access to the box. The location of the box is shown on Figure 4.

The marked box will also contain:

- Fire Marshall high viz vest
- Spare PPE - (nitrile gloves, PVC gauntlets, overalls, overshoes, safety goggles)
- Additional Fire extinguishers and fire balls
- Spill kits with absorbents (granules) and booms
- First Aid Kit
- Additional Copy of Fire Plan
- Disposal bags
- Cable ties
- Duct tape
- Spare drip trays
- Emergency signage
- Tool box

Sand bags and 250m of poly booms will also be provided in an adjacent separate container.

Separate spill kits are also deployed in each site area as shown on Figure 4. These comprise:

- Absorbent pads, granules, cushions and socks
- Flow Stopper Mats and putty
- Disposal bags, bins and ties

Similar (smaller) spill kits and fire extinguishers will also be located on each item of plant. All of these spill kits are for dealing with minor spillages.

3.4 Site Security and Automated Fire Detection

The site is surrounded by 2.4m high twin mesh fencing and fitted with a 24/7 motion sensitive CCTV monitoring system. There are also automated optical beam detectors within each buildings. All of these systems are remotely monitored and in the event of an incident the emergency services are immediately informed alongside site Key Holders.

In combination with on-site vigilance during operating hours, all of these systems mean that an incident will be rapidly detected and acted upon.

3.5 EMS Procedures

Procedures are in place for waste acceptance waste management including the identification and management of non-permitted wastes and contraries. As waste is subject to visual inspections and manually sorted, the opportunity of items such as batteries passing through to machinery is significantly reduced. These measures are aimed at ensuring the quality of the

recovered product and reducing the chance of lithium batteries (and other similar items) causing fires.

3.6 Management Plans

The site has specific management plans for mitigation and prevention of incidents that could give rise to pollution or Permit breach. These include a Fire Prevention and Mitigation Plan, an Odour Management Plan and a Noise Management Plan.

In combination, these enable the site to be operated in way that ensures compliance with the Permit and minimises the risk of pollution.

3.7 Training

All relevant staff working on the permitted activities will be trained on the requirement of the Permit, EMS, Fire Plan, EAMP, Odour Management Plan and NMP. To assist with management of training records and needs, AWD will regularly undertake analysis to identify training needs, skill gaps and record all training on the relevant forms in Appendix 2.

➢ See Training Forms SF04 and SF05 in Appendix 2

Management will ensure that all relevant staff are:

- trained in aspects that can lead to pollution and the measures to be taken to prevent that pollution.
- trained to deal with accidents and incidents.
- aware of responsibilities under the Permit and Management Plans.
- aware of the importance of equipment and plant maintenance.
- competent to operate machinery and provided with safe operating instructions for that equipment or activity.
- appropriately inducted, including contractors.

Records of training will be maintained by AWD.

➢ See Training Forms SF04 and SF05 in Appendix 2

The management is fully committed to protecting the environment and demonstrating continual environmental improvement. Through effective training, communication and delegation, management will encourage all employees to be committed to the full implementation of this EMS.

Following a training needs assessment, training of each employee will comprise a combination of techniques including:

- Induction training – new employees (and existing employees who have not yet been inducted) will be talked and walked through the site rules and practical steps required during waste acceptance, handling and storage to prevent pollution and spot potential problems such as contraries, unacceptable waste, housekeeping improvements and fire risk awareness.

- Tool box talks lead by site management and external parties – these will focus on the key issues detailed in the management plans and be repeated in accordance with a training schedule to ensure the key technical precautions are at the forefront of everyone's mind.
- Use of free on-line and hard-copy training resources provided by WAMITAB. This will include improving understanding of how fires may start in the waste industry due to the presence of batteries and how quickly fires may develop and the implications for site management.
- Hands-on practical incident management including evacuation drills, firefighting and extinguisher demonstrations including placing of waste in skips and quenching with water from IBCs and on-site fire water supply and the deployment of sand bags and fire water booms

Key personnel and senior management will also be trained in basic First Aid by a qualified third party institution. Records of this training will be included in the operating record for the facility.

4 INCIDENCE RESPONSE

This section details the specific actions personnel will take during an incident. Key plans of the site are attached as follows:

Figure 2. Site Layout
Figure 3. Drainage Layout
Figure 4. Spill Kits & Evacuation

4.1 Emergency Contacts

Key emergency contact details are summarised in Table 4-1.

Table 4-1 Emergency contact details

SITE DETAILS			
Location:	Byass Works, The Docks, Port Talbot. SA13 1RS		
Postcode:	SA13 1RS		
Site Access Grid Reference:	SS 75938 89637		
What3words location for site entrance	going.mint.ready		
SITE CONTACTS	**Name**	**Office Hours (specify)**	**Out of hours**
Managing Director **(Key holder):**	Alyn Wyn Davies	07833310470	07833310470
General Manager:	David Morgan	07944189940	07944189940
EMERGENCY SERVICES		**Office Hours**	**Out of hours**
Fire / Ambulance / Police		999	999
Fire: South Wales Fire and Rescue (non-emergency)		01443 232000	
REGULATORS			
Health and Safety Executive (HSE)		0345 300 9923	0151 922 935
Local Authority – Neath Port Talbot		01639 686868	01630 686868
Natural Resources Wales (24hr emergency)		0300 065 3000	0300 065 3000
UTILITY/KEY SERVICES			
24/7 CCTV Security	JPR Phoenix	01443 810730	01443 862276
Fire Alarms	Tringmain Security Ltd	020 8533 0516	020 8533 0516
Key Holders	Shield Security	01792 323000	08452 937 566
Key Holders & dog patrol	KLM Security Ltd	0800 86 11 636	0800 86 11 636
Water undertaker	Dwr Cymru	0800 052 0130	0800 052 0130
Sewerage undertaker	Dwr Cymru	0800 052 0130	0800 052 0130
Electricity supplier	SSE	0345 026 2658	0800 052 0400
Fuel supplier	Oils for Wales	01267 275 777	
Joiner	Gareth Cavanagh	07800 646452	
Tanker company/Waste removal	GD Environmental Ltd and/or Siddells	GD - 01633 277755 Siddells - 01554 778 486	
IMMEDIATE NEIGHBOURS			
Exuma Plant	01639 881567	07885 326123 (Jason)	

4.2 Site Evacuation

Emergency evacuation routes are indicated on Figure 4. In the event of an incident all personnel would muster at the assembly point, next to the site entrance, by calmly following the Evacuation Plan:

Evacuation Plan

1. All non-essential persons should be instructed to leave the site and report to the designated Assembly Point on Figure 4. As this is next to the site entrance, a direct escape route should be followed. Persons evacuating must obey site rules, ensure other workers also evacuate, assist any person who needs help (if safe to do so), not stop to collect any personal belongings, proceed directly to the Assembly Point and remain there until officially instructed otherwise.
2. The Site Manager and other trained personnel should access the Pollution Control Box and don the high viz Fire Marshall jackets and grab fire extinguishers / fire balls and poly booms / sand bags, depending upon nature of incident.
3. The signage informing customers that the site is temporarily closed should also be grabbed from the Pollution Control Box and erected at junction of site access road with A4241. A staff member wearing a high-viz vest should staff the junction and re-direct any deliveries to other sites and direct Fire Service as they arrive.

To ensure all personnel are familiar with the evacuation routes and actions to take during an incident, all personnel will be trained in the evacuation plan and will be tested in accordance with the evacuation drill procedure.

- See Procedure P03 Evacuation Drill Procedure

4.3 Spills and Leaks

All personnel will be fully trained in the use of spill kits via hands-on training and toolbox talks. A record of this training will be kept on the AWD training matrix. In the event of a spill or an incident, initial actions would comprise:

- Stopping any contamination/spill at source.
- Containing the spill / affected area.

Procedures detailing the steps to take to prevent and deal with spillages are included in Procedure P004.

- See Procedure P004

4.4 Prevention of Controlled Water Pollution

Procedure P005 is in place to limit the possibility of either surface water or groundwater pollution.

- See Procedure P005

4.5 Flooding

The site is not in an area at significant risk of flooding and there is always likely to be warning/ signs of flooding occurring i.e. the site is not in an area that could be suddenly and significantly inundated. However, there is still a risk of flooding and pro-active steps may need to be taken if a flood event is suspected or predicted. To ensure AWD is aware of such events, the Senior Managers are registered to received flood line alerts from NRW. However if the situation is too dangerous to prepare the site for flooding, then evacuate all personnel and inform Emergency Services and NRW.

In the event of a flood the permitted waste types that may be washed off site would predominantly add to the volume of the post-flood clean-up workload, rather than the hazard. However, to minimise risks to the environment Procedure P006 should be followed to prepare for and deal with a potential flood event.

- See Procedure P006
- See Procedure P005 for preventing surface water and groundwater pollution

4.6 Noise and Vibration

Under normal operating conditions, noise is not predicted to be a problem. A procedure outlining the steps AWD will take to minimise the possibility of site noise and vibration causing nuisance to off-site receptors is set out in P007. Measures are also detailed in the Noise Management Plan. Where necessary, the contingency actions set out in the Noise Management Plan will be implemented, as summarised in Table 4-2.

Table 4-2 Noise Contingency Action Plan

OBJECTIVE To initiate timely mitigation measures to prevent significant off-site noise problems		
Frequency of test	Following receipt of complaint related to noise or identification of significant rise in on-site noise levels	
CONTINGENCY ACTION RESPONSES		**Response Time**
Step 1. Investigate Potential Sources Following detection of potential noise problem undertake detailed site inspection. If source of noise is obvious go to Step 2. If source cannot be identified go to Step 4.		Within 1 day or same day where feasible
Step 2. Remove noise source Review working practice and source of noise. Cease relevant operation and implement remedial actions where necessary. Go to Step 3.		Within 48 hrs of problem detection
Step 3. Continued Monitoring Repeat routine evaluation of site noise levels based on experience and familiarity once problem has been remedied. If problematic noise levels are still persistently detectable go to Step 4.		Within 1 week of problem initially being identified
Step 4. Further Investigation and Monitoring Ensure obvious noise problems have been remediated. Consider all available information including meteorological records, complaints history, other activities occurring at site / in surrounding area. Undertake detailed site inspections on-site and off-site for noise sources in accordance with H3 guidance. This will likely involve noise level assessment and monitoring at site and at receptor(s). Some operations may need to temporarily cease. **Outcome 1. Waste activity considered to be noise source.** Cease identified problematic activity and identify new mitigation measures. Go to Step 5. **Outcome 2. Waste activity not considered to be noise source.** Document investigations and return to normal operations.		Within 2 weeks of problem being identified
Step 5. Implement Mitigation Measures Review risks to off-site receptors. Implement relevant mitigation measures in consultation with NRW and noise advisors. This may involve temporarily ceasing operations.		Within 4 weeks of problem being identified

- See Procedure P007 and Noise Management Plan

4.7 Release of Dusts, Fibres and Particulates

Measures that will be embedded by AWD into the day-to-day operation of the site to reduce the possibility of dust and particulates being released are summarised in Procedure P008.

- See Procedure P008

4.8 Litter escape

Procedure P009 details the steps to be taken should litter on site roads and external areas be identified.

- See Procedure P009

4.9 Mud and Debris on Roads

Procedure P010 details the steps to be taken should mud and debris on site roads and external areas be identified.

- See Procedure P010

4.10 Nuisance from Pests

The steps details in Procedure P011 should be followed for identifying and managing pests.

- See Procedure P011

4.11 Nuisance Odour

Odorous waste should be evaluated and dealt with in accordance with Procedure P012 and Odour Management Plan. To ensure this is the case a routine sniff test will be performed and the company open to accept feedback from third parties. Where necessary, the contingency actions set out in the Odour Management Plan will be implemented, as summarised in Table 4-3 and 4-4.

- See Procedure P012 and Odour Management Plan

Table 4-3 Sniff Test Contingency Action Plan

OBJECTIVE To initiate timely mitigation measures to prevent off-site odour problems	
Frequency of test	Following receipt of latest monthly sniff test results
Monitoring Locations	Boundary of Byass Works

CONTINGENCY ACTION RESPONSES	**Response Time**
Step 1. Investigate Potential Sources Following detection of odour during monthly boundary monitoring undertake detailed site inspection. Ideally involve someone who's sense of smell has not become adapted to any odours that might be present. If odour source is obvious go to Step 2. If odour source cannot be identified go to Step 4.	Within 1 day or same day where feasible
Step 2. Remove odorous waste Remove odorous waste to isolation in quarantine immediately. Return to customer as soon as possible. Go to Step 3.	Within 48 hrs of odour detection return the identified problematic waste to customer
Step 3. Continued Monitoring Repeat boundary monitoring once waste has been removed daily for a week. If odour is not detectable return to monthly monitoring. If odour is persistently detectable go to Step 4.	Within 1 week of waste being removed at Step 2.
Step 4. Further Investigation and Monitoring Ensure obvious odorous waste has been removed. Consider all available information including meteorological records, complaints history, other activities occurring at site / in surrounding area and time remaining for waste to be transferred. Repeat sniff testing monitoring daily at different times of day to assess for spatial and temporal variation. Also undertake sniff monitoring beyond site boundary. Continue to inspect waste storage areas. **Outcome 1. Waste storage considered to be odour source.** Review waste acceptance protocols and inform customer to try and identify potential cause. Determine next steps considering time waste has been in storage and time remaining on site. Inform NRW. Investigations may require moving waste. Go to Step 5. **Outcome 2. Waste storage not considered to be odour source.** Document investigations and return to monthly monitoring.	Within 1 week of waste being removed at Step 2
Step 5. Implement Mitigation Measures Review risks to off-site receptors. Implement relevant mitigation measures in consultation with NRW. Once works are completed return to monthly monitoring.	Within 2 weeks of waste being removed at step 2.

Table 4-4 Contingency Action Plan following Odour Complaint

OBJECTIVE To proactively investigate odour complaints and implement mitigation measures		
Frequency of test	Following receipt of complaint	
Monitoring Locations	Complaint may come from any location.	
CONTINGENCY ACTION RESPONSES		**Response Time**
Step 1. Investigate Potential Sources Following receipt of complaint undertake detailed site inspection and review of sniff test monitoring. Ideally involve someone who's sense of smell has not become adapted to any odours that might be present. If odour source is obvious go to Step 2. If odour source cannot be identified go to Step 4.		Within 1 day or same day where feasible
Step 2. Remove odorous waste Remove odorous waste to isolation in quarantine. Return to customer as soon as possible. Inform complainant of works undertaken. Go to Step 3.		Within 48 hrs of odour detection
Step 3. Continued Monitoring Repeat boundary monitoring once waste has been removed daily for a week. If odour is not detectable return to monthly monitoring. If odour is persistently detectable go to Step 4.		Within 1 week of waste being removed at Step 2.
Step 4. Further Investigation and Monitoring Ensure obvious odorous waste has been removed. Consider all available information including meteorological records, complaints history, sniff test results, other activities occurring in surrounding area. Repeat sniff testing monitoring daily at different times of day to assess for spatial and temporal variation. Also undertake sniff monitoring in other potential sources beyond site boundary. Continue to inspect waste storage areas and other areas. **Outcome 1. Waste storage considered to be odour source.** Review waste acceptance protocols and inform customer to try and identify potential cause. Determine next steps considering time waste has been in storage and time remaining on site. Inform NRW. Investigations may require moving waste. Go to Step 5. **Outcome 2. Waste storage not considered to be odour source.** Document investigations and return to monthly monitoring. Inform complainant. Consider requesting complainant to complete an Odour Diary.		Within 1 week of waste being removed at Step 2
Step 5. Implement Mitigation Measures Review risks to off-site receptors. Implement relevant mitigation measures in consultation with NRW. Inform complainant. Once works are completed return to monthly monitoring.		Within 2 weeks of waste being removed at step 2.

4.12 Reporting

AWD recognises that accidents and near misses can cause pollution. For this reason each incident or near miss will be managed and recorded in accordance with Procedure P013 and P014 and Form SF08.

- Use Procedure P013 and P014 for recording accidents and near misses
- Use Form SF08 for recording Incidents

As part of the site EMS, this EAMP will be subject to audit and review using the relevant procedures and forms included in the EMS.

5 ACTIONS FOLLOWING AN INCIDENT

Incidents that impact the environment or cause breach of Permit conditions can cause significant direct and indirect harm to people, the environment, commercial activities and public resources.

5.1 On-site Assets

Although the assets are of economic importance, AWD recognises that these items can be replaced and that, at no time, should personnel or the third parties such as the Fire Rescue Service (FRS) risk human life in their protection.

5.2 Human and Infrastructure Receptors within 1km of site

Specific potentially sensitive human receptors within approximately 1km of the site are listed in Table 5-1 and some shown on Plate 5-1.

There are many residential properties over 100m to the west and north of the site. There are also commercial neighbours to the south, north, east and west.

During and following an incident, the Managing Director will initially contact via telecommunication / text message the immediate neighbour. Other neighbours and wider community will also be encouraged to provide feedback that would be accommodated in the EAMP review following an incident.

The immediate neighbours in the commercial facilities and houses will be informed of the actions being taken during an incident and whether they need to alter their activities to minimise impact on themselves and assets e.g. close windows, vacate premises, move plant etc. This would be done by senior management visiting the nearest residential properties potentially affected.

Table 5-1 Selection of key human receptors

Receptor	Details	Contact Information	Direction from site
St Joseph's Infant School	20 Norman St, Port Talbot SA12 6EL	Tel: 01639 882579	200m North
Neath Port Talbot Hospital	Baglan Way, Port Talbot SA12 7BX	01639 862000	1000m Northwest
Residential areas, shops, playing fields and open areas			Aberavon 75m north/ northwest Port Talbot 300m northeast
Port Talbot Bus Station	Port Talbot SA13 1HE	First: 01792 572255	200m north northeast
Industrial units	LBS: Unit 5, Cramic Way, Port Talbot SA13 1RU	LBS Tel: 01639 884433	200m northeast
Court buildings	Harbourside Road, Port Talbot SA13 1SB	Tel: 01639 642267	200m east
Chemical laboratories and testing facilities	Harbourside Industrial Estate		200m east

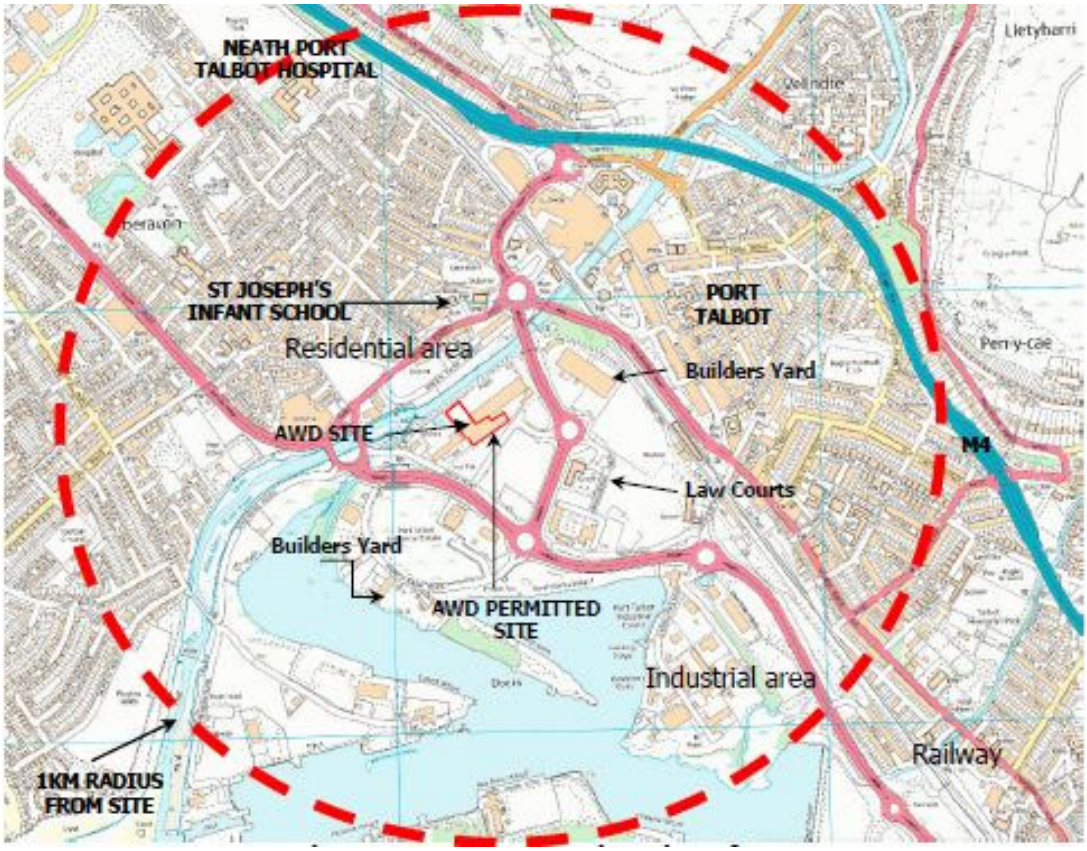


Plate 5-1 Features within 1km of Site

5.3 Key Infrastructure

Key infrastructure is listed in Table 5-2 and some shown on Plate 5-1.

Table 5-2 Selection of key infrastructure

Receptor	Direction from site
A4241	100m south and north
A48	200m north
M4	900m north
Port Talbot Parkway Railway station	400m east
Swansea - London railway line	300m northeast

5.4 Environmental Receptors within 1km

Key environmental receptors within approximately 1km of the site are listed in Table 5-3.

Table 5-3 Environmental Receptors within 1km of the site

Receptor	Direction from site
River Afan & Dock Feeder channel	<100m northwest

There are no ecologically protected sites in close proximity.

5.5 Engaging Community

During an incident, the Senior Management Team would phone / message the immediate neighbour to explain that there is an ongoing incident and to advise on measures being taken. A Senior management member would also visit the residential properties to the west, on the opposite side of the River Afan.

Following the incident, the Managing Director will meet with the neighbours to explain what has happened and the steps that will be taken to minimise an incident in the future. The neighbours will also be encouraged to provide feedback that would be accommodated in the updated EAMP.

5.6 Becoming Operational Again

The precise actions required following an incident will be dependent on the scale and nature of the incident. Protection of the environment will be prioritised and the clean-up operation, where required, will be carried out in full consultation with NRW. Permitted activities will not re-commence without NRW approval.

Following an internal review of the cause of the incident, the findings will be integrated to an updated EAMP. Such a review would also accommodate any observations made by NRW, FRS or other third parties.

6 REVIEW AND MONITORING

6.1 Routine Review

Each year this EAMP will be subject to review. This will be aimed at ensuring that the procedures implemented on site match those documented. Improvement programmes will be developed to ensure that risks are always minimised.

6.2 Monitoring

The following Key Performance Indicators will be used to monitor the effectiveness of this EAMP:

- Number of environmental incidents recorded annually
- Achieving set schedules and time frames (evacuation drills and building audits)
- Measuring the number of Fire Service call outs against cause
- Number and nature of enforcement, alterations or prohibition notices from statutory authorities
- Quarterly / six monthly/ annual premises inspection and meetings to ensure actions and progress are made
- Annual audit of all fire systems by external party
- Six-monthly review of all spill kits

Fire extinguishers would be subject to monthly visual inspection to check for damage and accessibility and annually tested and serviced, as required, in accordance with manufacturers requirements.

6.3 Audit

AWD recognises that it is important for the day-to-day activities to implement what is written in the EMS and Management Plans to ensure compliance with the Permit and manage and minimise risks to the environment, humans and property. Therefore, a planned programme of internal and external audit will be implemented. Internal audits will be undertaken quarterly and external audits annually and coupled to the annual review. The findings of all audits will be documented. During the audits, the following aspects will be evaluated:

- Paperwork & Records – Maintenance schedules, daily checks, staff training, transfer notes, stock rotation, location and site plans
- Procedures - Waste Treatment, waste acceptance, ignition sources, dust management, integrity of infrastructure
- Prevention – check of stockpile sizes, detection systems, fire walls, suppression systems and site security
- Emergency Response - Containment, disposal of waste, firefighting equipment, water supply

A compliance assessment may not be limited to these areas, but it gives a good indication of what an assessment may comprise.

6.4 Update following Incident

In addition to the regular annual review and six monthly monitoring and audit, this EAMP would be reviewed and updated where necessary following an incident.

A review would also be prompted if the activities at the site changed, if the waste types accepted changed, if waste volumes accepted increased or if new infrastructure (buildings or plant) was installed.

All aspects of the EAMP would be available for review during any update or review. Focussed attention would, however, be made to ensure that the document captures potential changes to the risk profile and additional preventative and management techniques required.

6.5 Communication of Plan

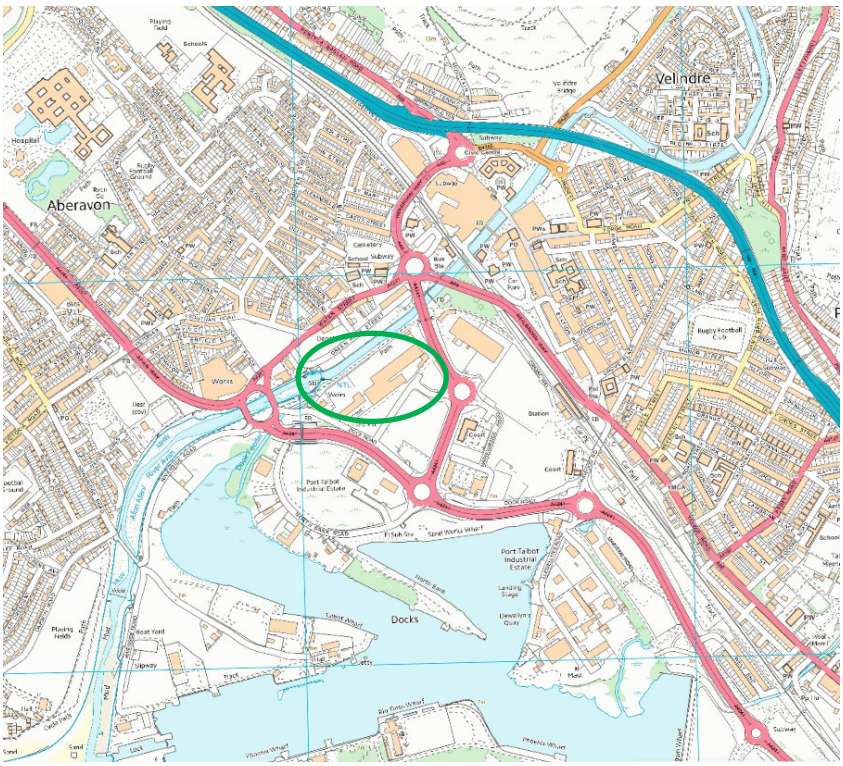
All staff will be trained on the relevant sections of this EAMP during their induction training and this training will be refreshed annually or after any amendment to the EAMP, whichever occurs soonest. Training will be recorded in each individual employees training records.

All contractors will be made aware of the key elements of the EAMP. This will be recorded in the Site Induction Training file.

All training on the EAMP will focus on the actions necessary to:

1. Prevent an incident occurring; and
2. Actions necessary if an incident occurs.

Figure 1 Site Location Plan



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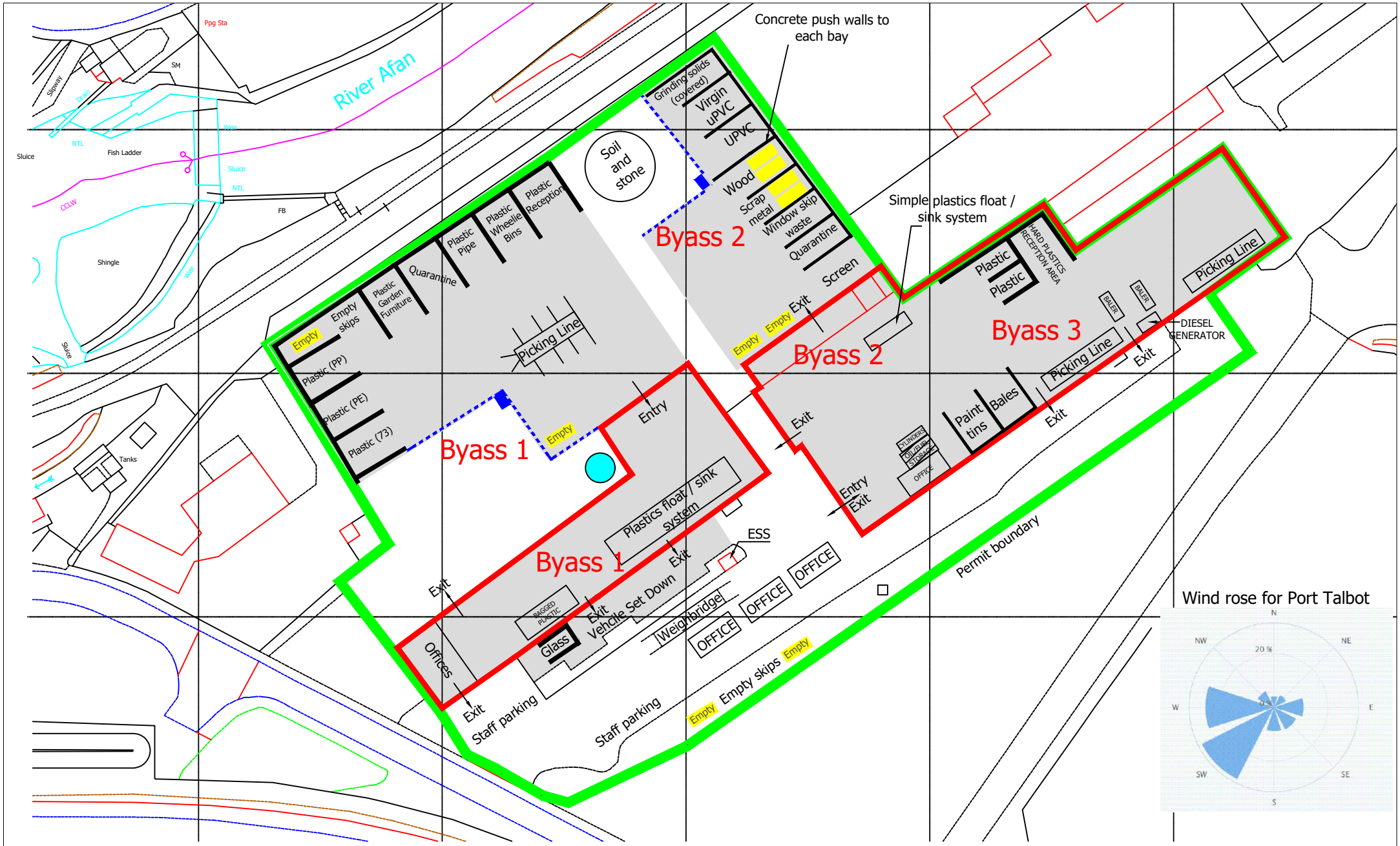
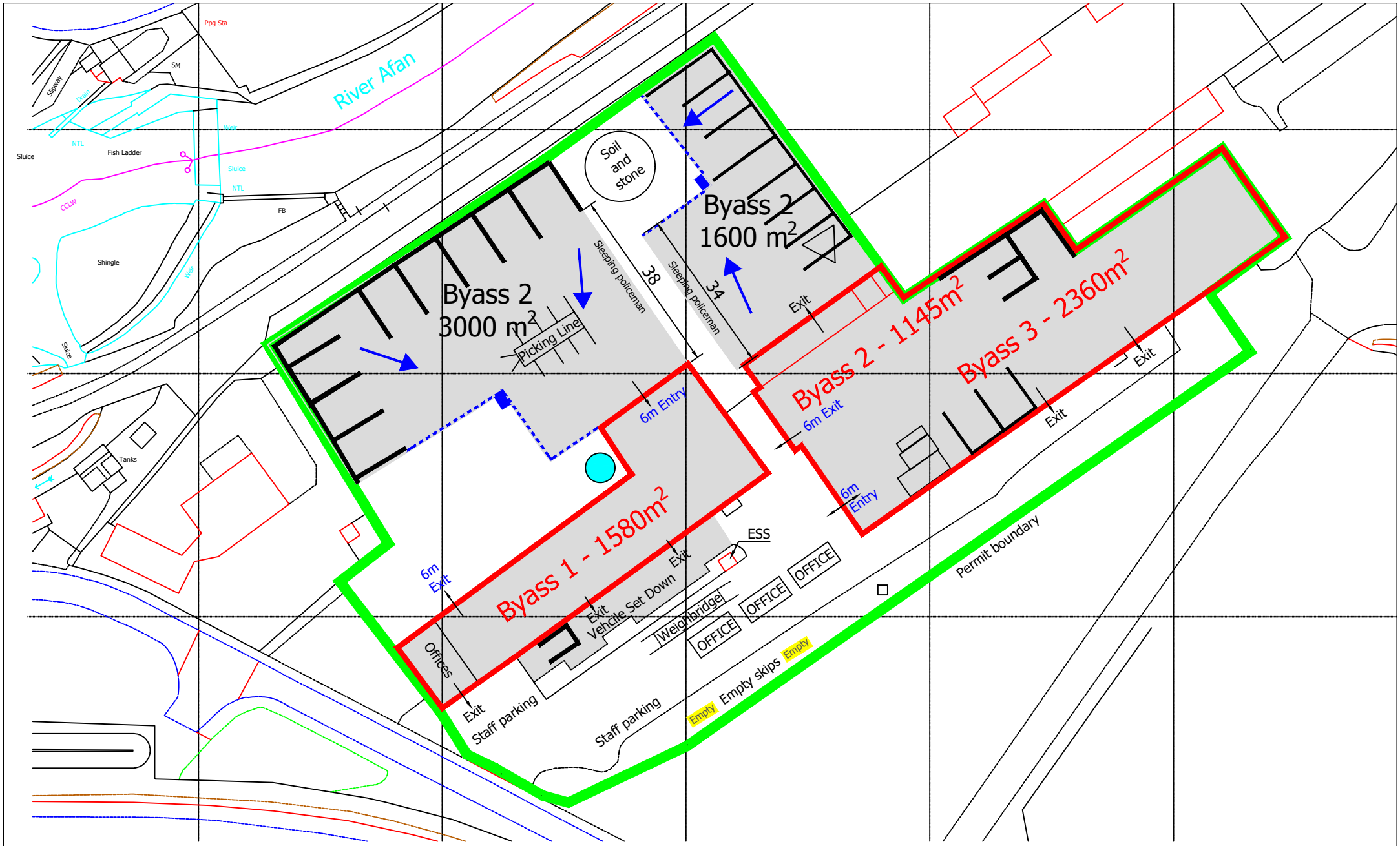
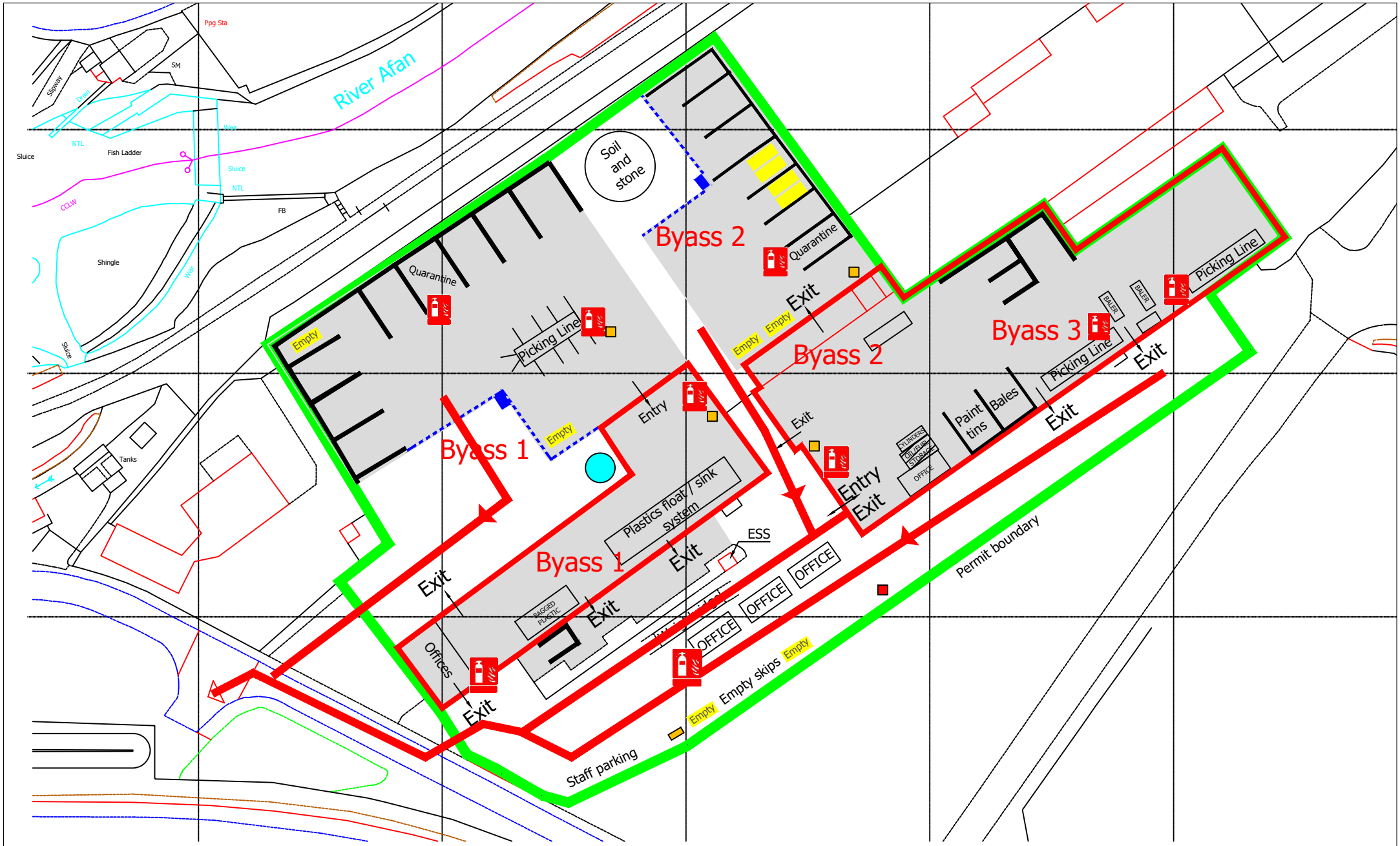


Drawing Number 2099r8/2	NOTE	CLIENT **AWD Ltd**	PROJECT **Environmental Permit**	DRAWING NUMBER **Figure 2**	REVISION **3**
Legend: Concrete; RORO; Sealed drainage with tanks; 35m3 fire water tank; Smoking Area		Rev / Date / Status/Ammendments	TITLE **Site Layout**	SCALE **As Shown** DATE **09/22** DRAWN **BR** CHECKED	Geotechnology, Ty Coed, Cefn-yr-Allt, Aberdulais, Neath, SA10 8HE, 01639 775293, www.geotechnology.net



Drawing Number 2099r8/3	NOTE	CLIENT **AWD Ltd**	PROJECT **Environmental Permit**	DRAWING NUMBER **Figure 3**	REVISION **3**
Legend Concrete RORO Sealed drainage with tanks 35m³ fire water tank Smoking Area		Rev / Date / Status/Ammendments	TITLE **Site Drainage**	SCALE **As Shown** / DATE **09/22** / DRAWN **BR** / CHECKED	Geotechnology Ty Coed, Cefn-yr-Allt, Aberdulais, Neath SA10 8HE 01639 775293 www.geotechnology.net



Drawing Number 2099r8/4

NOTE

Legend

- Concrete
- 35m3 fire water tank
- Sealed drainage with tanks
- Escape route
- Smoking Area
- Pollution Control Grab Box
- Extinguishers and Fire Balls
- Spill Kits

CLIENT	AWD Ltd
PROJECT	Environmental Permit
TITLE	Spill Kits & Evacuation
DRAWING NUMBER	Figure 4
REVISION	3
SCALE	As Shown
DATE	10/22
DRAWN	BR
CHECKED	

Rev	Date	Status/Ammendments

Geotechnology
Ty Coed, Cefn-yr-Allt,
Aberdulais, Neath
SA10 8HE
01639 775293
www.geotechnology.net

BYASS WORKS WASTE TRANSFER FACILITY

Environmental Permit Variation Application

ENVIRONMENTAL ACCIDENT MANAGEMENT PLAN (EAMP)

Appendix 1
Procedures relevant to EAMP

AWD Group Ltd EMS

PROCEDURE TITLE	**Discovery of Suspicious Item in Waste**
Version	**3**
Date	**October 2022**
Owner	

Link to Environmental Aspects Assessment

Environmental Aspect Ref:	Aspect Description	Link to Aspect & Impact Assessment
All aspects	All aspects of environmental risk assessment	Waste acceptance has potential to impact all risks at the site

Overview & Scope

Description
Actions to be followed if suspicious item discovered in waste following acceptance

Legal & Other Requirements

Requirement	Description
Permit condition 2.2	Waste acceptance procedures to be in place
Permitting guidance	

Responsible Persons

Responsibility	AWD Responsible Person	Contact No (if applicable)
Procedure owner		
Implementation of procedure		
Responsibility	**Other Responsible Person (e.g. Sub-contractor)**	**Contact No**

Procedure

Steps to be taken
Lithium batteries and gas cylinders can cause fires. Be vigilant. If a suspicious item is discovered the following procedures will be adopted. • Stop work and make others working nearby aware of discovery • Move all personnel away from area to muster point • Inform site foreman / Senior Manager immediately. • Inform Emergency services using 999 • Site to remain under the control of the senior emergency officer until the emergency/incident is over. ➢ Use Form F002 to record non-compliant wastes

Acceptable Performance Criteria

A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance

Measure	Target / Requirement
Record of non-compliant wastes	Zero non-compliant wastes each year

Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Form F002 Non-compliant wastes	Office

AWD Group Ltd EMS

PROCEDURE TITLE	**Site Evacuation Drill**
Version	**3**
Date	**October 2022**
Owner	

Link to Environmental Risk Assessment Aspects

Environmental Aspect Ref:	Aspect Description	Link to Aspect & Impact Assessment
ASP11, 12	Incident such as fire or flood	Drills will enable site to be prepared for potential incident

Overview & Scope

Description
Steps to be followed during a drill

Legal & Other Requirements

Requirement	Description
Permit condition 3.4	Operate site in accordance with Permit
Permitting guidance	

Responsible Persons

Responsibility	AWD Responsible Person	Contact No (if applicable)
Procedure owner		
Implementation of procedure		
Responsibility	**Other Responsible Person (e.g. Sub-contractor)**	**Contact No**

Procedure

'Normal & Abnormal' Operating Conditions (overview of standard operations)

A drill is intended to ensure, by means of training and rehearsal, that in the event of an incident:

- The people who may be in danger act in a calm and orderly manner. Where necessary those designated carry out their allocated duties to ensure the safety of all concerned.
- The means of escape are used in accordance with a pre-determined and practised plan.
- If evacuation of the building becomes necessary, staff should be aware of what to do.

Where there are alternative means of escape the drill should be based on the assumption that one or more of the escape routes cannot be used because of the incident. During these drills a member of staff who is told of the supposed outbreak should operate the alarm and, thereafter, the evacuation routine should be rehearsed as circumstances allow. This may raise some difficulties where members of the public are present, but such a procedure is still desirable.

It should also be remembered that regular drills test the procedures and training that you have put in place for the safe and effective evacuation of **disabled and infirm employees and visitors**. In cases where there are profoundly deaf or disabled people employed, then an alternative alarm may need to be in place.

Conducting an Evacuation Drill

Normally advance warning should **not** be given of the drill. However, you can individually warn anyone who may need to know in advance. Every opportunity should be taken to learn lessons from the drill and to reinforce staff training where gaps are identified. It is good practise to appoint a small number of people, usually safety representatives or managers to observe the drills and highlight areas of concern. It is important that all managers are aware of the procedures, as employees will naturally look towards them in an emergency.

No.	Check List	Yes/No/NA	Comments
1	Agree the scenario, extent and aim of the exercise with senior management.		
2	Assemble a multi-disciplinary exercise planning team and agree the objectives for each area to be exercised.		
3	Sketch out and then develop the main events of the exercise and associated timetables.		
4	Determine and confirm the availability of the outside agencies to be involved, such as the media or voluntary agencies.		
5	List the facilities required for the exercise and confirm their availability e.g. transport, buildings and equipment.		
6	Ensure that all communications to be used during the exercise have been tested at some stage prior to the exercise.		
7	Check that Umpires for each stage of the exercise are clearly identified and properly briefed.		
8	Ensure that directing staff are clearly identified and properly briefed and have good independent communications with "exercise control" throughout the exercise.		
9	If the exercise links a number of activities or functions which are dependent on each other, confirm that each has been individually tested beforehand.		
10	Ensure that all participants have been briefed.		
11	Ensure that all players are aware of the procedures to be followed if a real emergency occurs during the exercise.		
12	If spectators are to be invited, including the media, ensure that		

	they are clearly identified and properly marshalled, and arrange for them to be kept informed of the progress of the exercise. Ensure their safety.		
13	For the longer exercise, arrange catering and toilet facilities.		
14	Ensure that where appropriate outside agencies are indemnified in the event of exercise accident.		
15	Warn the local media, emergency services switchboards / controls and any neighbours who might be worried or affected by the exercise. Position Exercise in Progress signs if appropriate.		
16	Ensure that senior management, directing staff, Umpires and key players are aware of the time and location for the "hot" debrief, and circulate a timetable for a full debrief.		
17	Agree and prepare a detailed set of recommendations, each one accompanied by an action addressee and timescale.		
18	Prepare a clear and concise summary report of the exercise to distribute to all organisations and groups which took part, together with major recommendations.		
19	Discuss with senior management the outcome of the exercise and agree the future exercise programme.		
20	Thank all personnel and outside agencies which took part.		

- **Use Form F006 to record the findings of the drill**

Acceptable Performance Criteria

A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance

Measure	Target / Requirement
Time taken to evacuate all personnel	3 minutes

Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Form F006 for recording findings of drill	Office

AWD Group Ltd EMS

PROCEDURE TITLE	**Spillage/Leakage Response**
Version	**3**
Date	**October 2022**
Owner	

Link to Environmental Aspects Assessment

Environmental Aspect Ref:	Aspect Description	Link to Aspect & Impact Assessment
ASP13	Spillage posing risk to controlled water	Spillages could impact surface water and groundwater

Overview & Scope

Description
Actions to be undertaken in response to spillage or leakage

Legal & Other Requirements

Requirement	Description
Permit condition 3.1	Control of emissions that may give rise to pollution
Permitting guidance	

Responsible Persons

Responsibility	AWD Responsible Person	Contact No (if applicable)
Procedure owner		
Implementation of procedure		
Responsibility	**Other Responsible Person (e.g. Sub-contractor)**	**Contact No**

Procedure

Steps to be taken if safe to do so

Pollution may result from accidental leaks or spillages from waste, plant and vehicles or from liquid wastes discovered in loads and destined for quarantine as an unacceptable waste.

Spillage / Leakage – Steps to be taken

The following procedure is adopted for all accidental spillages of liquids whether inside buildings or in yard areas. Responsibility for any spillage lies with the first person noticing or finding the spill and they must take steps to contain it by taking action as follows:

If there is a fire or medical attention needed, contact emergency services on 999.

Attend to any people who may be contaminated. Contaminated clothing should be removed immediately and the skin flushed with copious amounts of water until emergency assistance arrives. Take advice from 999 call handler where relevant.

If a volatile, flammable material is spilled, immediately warn everyone, control sources of ignition and ventilate the area.

If safe to do so, stop the spill / leak if still occurring:

☐ Block off any local discharge points using sand bags / spill booms / spill mats e.g. drains and other routes of liquid escape
☐ Area surrounding spillage to be isolated by application of absorbent granules / mats or clean sand to prevent vehicles or personnel from passing over the area and thus spreading the spilled liquid. Apply the loose spill control materials working from the outside, circling to the inside. This reduces the chances of splash or spread of the spilled chemical.

When spill materials have been absorbed use brush and scoop to place materials in appropriate container. Polyethylene bags may be used for small spills. 5 gallon drums or 20 gallon drums with polyethylene liners may be appropriate for larger quantities.

☐ Site manager notified as soon as possible
☐ Spill mats and spill kits, including absorbent granules, are to be spread on the spilled liquid until all is absorbed.
☐ When all the liquid is absorbed, the contaminated spill ktis will be loaded into a suitable drum for removal by a suitably licensed carrier to a licensed disposal or recovery facility.

Decontaminate the surface where the spill occurred using suitable detergents and water, when appropriate.

☐ Every instance of spill MUST be recorded and investigated as an accident or incident.

- Use form SFR08 for recording incident

Ongoing leakage – Steps to be taken

In addition to the above procedures, if a leakage is ongoing and the valve cannot be closed arrangements will be made to have the contents transferred or captured to an alternative container.

Spillage from a vehicle – Steps to be taken

In the event of a Spillage or leak that may occur from a vehicle during carriage or when stationary, the members of the vehicle crew shall take the following actions where safe and practicable to do so:

Apply the braking system, stop the engine and isolate the batter by activating the master switch where available.

Avoid sources of ignition, in particular, do not smoke or switch on any electrical equipment
Inform the appropriate emergency services, giving as much information about the incident and substances involved as possible.

Put on warning vest and place the self-standing warning signs as appropriate;

Keep transport documents readily available for responders on arrival.

Do not walk into or touch spilled substances and avoid inhalation of fumes, smoke, dusts and vapours by staying up wind;

Where appropriate and safe to do so, use on-board spill kit equipment to prevent leakages into aquatic environment or the sewage system and to contain spillages;

Remove any contaminated clothing and used contaminated protective equipment and dispose of it safely;

Move away from the vicinity of the spillage, advise other persons to move away and follow the advice of the emergency services.

Practice Spill Drills

Spill drills should be performed to check the effectiveness of procedures, equipmen and personnel and to identify improvements.

- Use Form F013 for recording spill drills

'Emergency' Operating Conditions (System out of control)
In the event of a major spillage implement as much as possible of the measures identified above but focus on the safety of personnel and do not implement any steps if there is a risk to human health. **Inform Emergency Services and NRW immediately.**

Acceptable Performance Criteria
A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance

Measure	Target / Requirement
Check for presence of spill kits Check liquids are provided with correct bunding Check liquid transfer techniques are working correctly	Weekly

Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Form F007 Inspection sheet	Office
Form F003 Preventative Maintenance Programme	Office
Form F004 Spill Kit training records	Office
Form F013 Spill Drill	Office
Form F008 Incident Report Form	Office

AWD Group Ltd EMS

PROCEDURE TITLE	**Preventing Pollution of Surface Water and Groundwater**
Version	**3**
Date	**October 2022**
Owner	

Link to Environmental Aspects Assessment

Environmental Aspect Ref:	Aspect Description	Link to Aspect & Impact Assessment
ASP11 – ASP17	Protection of controlled water	Liquids issuing from the site could impact surface water and groundwater

Overview & Scope

Description
Actions to be undertaken to protect surface water and groundwater

Legal & Other Requirements

Requirement	Description
Permit condition 3.1	Control of emissions that may give rise to pollution
Permitting guidance	

Responsible Persons

Responsibility	AWD Responsible Person	Contact No (if applicable)
Procedure owner		
Implementation of procedure		
Responsibility	**Other Responsible Person (e.g. Sub-contractor)**	**Contact No**

Procedure

Steps to be taken if safe to do so
Pollution may result from accidental leaks or spillages from waste, plant and vehicles or from liquid wastes discovered in loads and destined for quarantine as an unacceptable waste. Flooding could also cause pollution by mobilising fluids / waste. ➢ Use Procedure P004 for dealing with spillages and leaks. To ensure site containment and drainage systems are functioning as intended they will be inspected weekly. The results of each site inspection shall be recorded on the site inspection form. ➢ Use Form F007 for recording Site Inspections Any maintenance and repair works will be carried out at the earliest opportunity. As the processing of dry waste occurs indoors and in areas with concrete there is a low risk of pollution impacting land, surface water or groundwater. The external areas of the site and surface drains will be inspected. The focus will be on identifying aspects that could influence the behaviour and flow directions of potential spills and leaks. Storage of all liquids covered by COSHH should be assessed. ➢ Use Form F014 for COSHH assessment

'Emergency' Operating Conditions (System out of control)

Acceptable Performance Criteria

A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance

Measure	Target / Requirement
• Check for presence of spill kits • Check liquids are provided with correct bunding • Check liquid transfer techniques are working correctly	• Weekly

Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Site Inspection sheets (Form 007)	Office
Preventative Maintenance Programme (Form F003)	Office
Spill Kit training records (Form FF004)	Office
COSHH assessment (Form F014)	Office

AWD Group Ltd EMS

PROCEDURE TITLE	**Response to Flooding of Site**
Version	**3**
Date	**October 2022**
Owner	

Link to Environmental Aspects Assessment

Environmental Aspect Ref:	Aspect Description	Link to Aspect & Impact Assessment
ASP9	Flooding of site	Flooding could mobilise waste from the site

Overview & Scope

Description
Actions to take if flooding is expected or expected to occur

Legal & Other Requirements

Requirement	Description
Permitting guidance	Planning for emergencies

Responsible Persons

Responsibility	AWD Responsible Person	Contact No (if applicable)
Procedure owner		
Implementation of procedure		
Responsibility	**Other Responsible Person (e.g. Sub-contractor)**	**Contact No**

Procedure

Steps to be taken
The site is at low risk pf flooding. Such an event could occur during prolonged heavy periods of rainfall and / or if adjacent River Afan overtops its banks. If the site was to flood some of the hazardous wastes and fluids stored on site, such as fuel, oils, paint and grinding solids could pose a risk to the environment. This procedure is aimed at limiting the risks to land and water. Natural Resources Wales and the Met Office provide flood warnings up to five days in advance and AWD is registered to receive such alerts. If a severe weather or flood warning is issued the following actions should be undertaken: Hazardous materials either secured or moved to a suitable and safe location where they cannot be affected by flood water. ☐ Plant, machinery and hazardous waste moved off-site where relevant ☐ Move any waste off-site where possible e.g. temporarily return to customer or move to another recycling facility ☐ Place sand bags around sensitive areas. ☐ Electricity supply turned off if water levels increase or likely to increase to a dangerous level. If a flood does occur: ☐ Electricity to site turned off, if safe to do so, and staff instructed to stay away from electrical outputs and devices. ☐ Site evacuated and staff to report to assembly point at Site entrance ☐ Visitor's books and employee clock in reports checked to ensure everyone is off site and at the assembly point. ☐ Emergency services and Natural Resources Wales notified. Before site re-occupation, potential hazards and issues will be identified and guidance from Natural Resources Wales and Local Emergency Services will be sought.

'Emergency' Operating Conditions (System out of control)
The site is not in an area at significant risk of flooding and there is always likely to be warning / signs of flooding occurring i.e. the site is not in an area that could be suddenly inundated. **However, if the situation is too dangerous to prepare the site for flooding then evacuate all personnel using the evacuation routes set out in the Fire Plan and inform Emergency Services and NRW.**

Acceptable Performance Criteria

A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance

Measure	Target / Requirement
Spill Kit checks	Weekly

Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Inspection sheets (Form F007)	Office
Env Incidents (Form F008)	Office
Spill Kit training records (Form F003)	Office

AWD Group Ltd EMS

PROCEDURE TITLE	**Preventing Noise and Vibration causing Nuisance**
Version	**3**
Date	**October 2022**
Owner	

Link to Environmental Aspects Assessment

Environmental Aspect Ref:	Aspect Description	Link to Aspect & Impact Assessment
ASP6	Release of noise from site	Noise can cause nuisance off-site

Overview & Scope

Description
Actions to be undertaken to prevent off-site nuisance from noise and vibration

Legal & Other Requirements

Requirement	Description
Permit condition 3.1	Control of emissions that may give rise to pollution
Permitting guidance	

Responsible Persons

Responsibility	AWD Responsible Person	Contact No (if applicable)
Procedure owner		
Implementation of procedure		
Responsibility	**Other Responsible Person (e.g. Sub-contractor)**	**Contact No**

Procedure

Steps to be taken if safe to do so
Noise is only likely to occur as a result of the abnormal movement of plant and vehicles on site or during use of recycling equipment. All vehicles and plant used at the facility will be well maintained and subject to a preventative maintenance programme. The Site Manager will carry out subjective noise inspections each day. Changes and increases in noise levels could be indicative of problems with plant and equipment. If this is the case the contingency actions set out in the Nosie Management Plan should be followed. The following measures will be taken to minimise the risk of noise and vibration: ☐ All plant machinery will be subject to regular inspection and maintenance; ☐ Equipment shall be switched off when not in use; and ☐ Treatment operations shall be arranged in such a way as to minimise noise production as far as possible.

Acceptable Performance Criteria

A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance

Measure	Target / Requirement
Complaints related to noise and vibration	Zero complaints each year

Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Form F007 Site Inspection sheets	Office
Form F003 Preventative Maintenance Programme	Office
Form F004 Spill Kit training records	Office

AWD Group Ltd EMS

PROCEDURE TITLE	**Preventing dust problems**
Version	3
Date	October 2022
Owner	

Link to Environmental Aspects Assessment

Environmental Aspect Ref:	Aspect Description	Link to Aspect & Impact Assessment
ASP1	Release of particulate matter	Dust and other airborne particulates can cause nuisance and impact environment

Overview & Scope

Description
Actions to be undertaken in response to dust problems

Legal & Other Requirements

Requirement	Description
Permit condition 3.1	Control of emissions that may give rise to pollution
Permitting guidance	

Responsible Persons

Responsibility	AWD Responsible Person	Contact No (if applicable)
Procedure owner		
Implementation of procedure		
Responsibility	Other Responsible Person (e.g. Sub-contractor)	Contact No

Procedure

Steps to be taken if safe to do so
There is little prospect of dust being released to the environment from the permitted activities in significant quantities as much of the processing is undertaking indoors and the waste types are not a significant source of dust. To ensure dust generation remains a low risk the following measures will be taken: • Minimising drop heights of potential dusty wastes when transferring and loading • Sweeping of indoor work areas and site yards. • Visually checking loads leaving the site for dust generating materials • Minimising vehicle speeds in the yard Where airborne material is persistently observed to be a problem the following actions will be considered: • Use of dust suppression comprising of a hose spray within the yard area; and • Sweeping of the site to remove dust or mud.

'Emergency' Operating Conditions (System out of control)
In the event of a major incident focus on the safety of personnel and do not implement any steps if there is a risk to human health

Acceptable Performance Criteria

A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance

Measure	Target / Requirement
Complaints received in relation to dust	Zero complaints related to dust

Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Site Inspection sheets (Form F007)	Office
Preventative Maintenance Programme (Form F003)	Office
Spill Kit training records (Form F004)	Office

AWD Group Ltd EMS

PROCEDURE TITLE	**Dealing with litter**
Version	**3**
Date	**October 2022**
Owner	

Link to Environmental Aspects Assessment

Environmental Aspect Ref:	Aspect Description	Link to Aspect & Impact Assessment
ASP3	Litter released from site	Litter can cause nuisance and impact off-site environment

Overview & Scope

Description
Actions to be undertaken in response to litter problems

Legal & Other Requirements

Requirement	Description
Permit condition 3.1	Control of emissions that may give rise to pollution
Permitting guidance	

Responsible Persons

Responsibility	AWD Responsible Person	Contact No (if applicable)
Procedure owner		
Implementation of procedure		
Responsibility	**Other Responsible Person (e.g. Sub-contractor)**	**Contact No**

Procedure

Steps to be taken if safe to do so
There is limited opportunity for litter to be directly released to the environment from the permitted activities. To ensure litter generation remains a low risk the following measures will be taken: ☐ Light waste fractions will be covered or move to areas where there is little prospect of wind-blow/ drafts ☐ If litter is found on the site yard or immediate access road the material will be removed

'Emergency' Operating Conditions (System out of control)
In the event of a major incident focus on the safety of personnel and do not implement any steps if there is a risk to human health.

Acceptable Performance Criteria

A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance.

Measure	Target / Requirement
Complaints received in relation to litter	Zero complaints related to litter

Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Weekly Inspection sheets	
Preventative Maintenance Programme	
Spill Kit training records	

Record / Document Description	Location of Records / Evidence
Inspection sheets (Form F007)	Office
Env Incidents (Form F008)	Office
Spill Kit training records (Form F003)	Office

AWD Group Ltd EMS

PROCEDURE TITLE	Dealing with mud on roads
Version	3
Date	October 2022
Owner	

Link to Environmental Aspects Assessment

Environmental Aspect Ref:	Aspect Description	Link to Aspect & Impact Assessment
ASP4	Release of mud from site	Mud on roads can cause nuisance, impact road safety and impact the environment

Overview & Scope

Description
Actions to be undertaken in response to problems with mud on roads

Legal & Other Requirements

Requirement	Description
Permit condition 3.1	Control of emissions that may give rise to pollution
Permitting guidance	

Responsible Persons

Responsibility	AWD Responsible Person	Contact No (if applicable)
Procedure owner		
Implementation of procedure		
Responsibility	**Other Responsible Person (e.g. Sub-contractor)**	**Contact No**

Procedure

Steps to be taken if safe to do so
The site is largely laid to concrete, tarmac or hardstanding and is located on an industrial estate. This results in limited opportunity for mud generation. There are no residential properties on the main access road. If mud on site roads is a significant problem mechanical sweeping will be undertaken.

'Emergency' Operating Conditions (System out of control)
In the event of a major incident focus on the safety of personnel and do not implement any steps if there is a risk to human health.

Acceptable Performance Criteria

A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance.

Measure	Target / Requirement
Complaints received in relation to mud on roads	Zero complaints related to mud on road

Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Weekly Inspection sheets (Form F007)	Office
Preventative Maintenance Programme (F003)	Office

AWD Group Ltd EMS

PROCEDURE TITLE	**Dealing with pests**
Version	**3**
Date	**October 2022**
Owner	

Link to Environmental Aspects Assessment

Environmental Aspect Ref:	Aspect Description	Link to Aspect & Impact Assessment
ASP7	Accepting wastes that encourage pests	Pests can cause on-site and off-site nuisance

Overview & Scope

Description
Actions to be undertaken in response to problems with pests

Legal & Other Requirements

Requirement	Description
Permit condition 3.1	Control of emissions that may give rise to pollution
Permitting guidance	

Responsible Persons

Responsibility	AWD Responsible Person	Contact No (if applicable)
Procedure owner		
Implementation of procedure		
Responsibility	**Other Responsible Person (e.g. Sub-contractor)**	**Contact No**

Procedure

Steps to be taken if safe to do so
The nature of the waste and the inspection procedures in place will limit the possibility of animal by-products and food waste that attract pests being received at the site. The following measures will be taken to minimise the risk of pests: ☐ Waste inspected before tipping to identify potential contaminants; ☐ Quarantine non-conforming putrescible wastes and removal off-site within 48 hours; ☐ Visual monitoring for pests/vermin performed daily including inspections for evidence of droppings, damage to property/plant or ground disturbance e.g. burrow, nests and excessive infestation present; and ☐ Good housekeeping and regular inspection of mess facilities. In the event of a pest infestation being detected the following measures will be implemented: ☐ Any waste identified as attracting scavengers shall be isolated and removed from site. ☐ Suitable treatment will be implemented either by trained employees or by suitable contractors, this may involve the application of insecticides or the setting of traps and poisons, or other measures as appropriate – these measures are considered last resort;

'Emergency' Operating Conditions (System out of control)
In the event of a major incident focus on the safety of personnel and do not implement any steps if there is a risk to human health.

Acceptable Performance Criteria

A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance.

Measure	Target / Requirement
Complaints received in relation to pests	Zero complaints related to pests

Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Form F007 Site Inspection Form	

AWD Group Ltd EMS

PROCEDURE TITLE	**Dealing with odour problems**
Version	**3**
Date	**October 2022**
Owner	

Link to Environmental Aspects Assessment

Environmental Aspect Ref:	Aspect Description	Link to Aspect & Impact Assessment
ASP5	Release of odour from site	Odour can cause nuisance

Overview & Scope

Description
Actions to be undertaken in response to problems with odour

Legal & Other Requirements

Requirement	Description
Permit condition 3.2	Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of Natural Resources Wales.
Permitting guidance	

Responsible Persons

Responsibility	AWD Responsible Person	Contact No (if applicable)
Procedure owner		
Implementation of procedure		
Responsibility	**Other Responsible Person (e.g. Sub-contractor)**	**Contact No**

Procedure

Steps to be taken if safe to do so
The nature of the waste and the inspection procedures in place will limit the possibility of odorous wastes being received at the site. However, the measures set out below and the Odour Management Plan should be implemented where relevant. The following measures will be taken to minimise the risk of odour: ☐ Waste inspected before tipping to identify potential contaminants; ☐ Quarantine odorous wastes and removal off-site within 48 hours; ☐ Sniff monitoring for odour performed ☐ Good housekeeping and regular inspection of mess facilities. In the event of an odour problem the following measures will be implemented: ☐ Suitable treatment will be implemented either by employees or by suitable contractors ☐ Any waste identified as generating the odour shall be isolated and removed from site. See Odour Management Plan for more detail.

'Emergency' Operating Conditions (System out of control)
If Natural Resources Wales considers that the activities are giving rise to pollution outside the site due to odour the odour management plan will be reviewed and updated.

Acceptable Performance Criteria

A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance

Measure	Target / Requirement
Complaints received in relation to odour	Zero complaints related to odour

Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Site Inspection Form (Form F07)	Office
Preventative Maintenance Programme (Form F003)	Office

AWD Group Ltd EMS

PROCEDURE TITLE	**Investigating near misses and accidents**
Version	**3**
Date	**October 2022**
Owner	

Link to Environmental Aspects Assessment

Environmental Aspect Ref:	Aspect Description	Link to Aspect & Impact Assessment
All Aspects	Near misses, accidents and incidents	Near misses, accidents and incidents have potential to cause pollution

Overview & Scope

Description
Actions to be undertaken in response to near miss or accident

Legal & Other Requirements

Requirement	Description
Permit condition 3.1	Control of emissions that may give rise to pollution
Permitting guidance	

Responsible Persons

Responsibility	AWD Responsible Person	Contact No (if applicable)
Procedure owner		
Implementation of procedure		
Responsibility	**Other Responsible Person (e.g. Sub-contractor)**	**Contact No**

Procedure

Steps to be taken if safe to do so
Immediately inform the site manager of the occurrence of a near miss or accident. If necessary, contact Emergency services on 999 If injury requiring medical treatment has occurred, contact appointed First Aider, or where necessary immediately dial 999. If necessary, refer to other procedures for dealing with emergencies: ➢ Use Procedure P003 for identification of suspicious items ➢ Use Procedure P004 for dealing with spillages ➢ Use FPMP for fires The Site Manager will investigate the near miss / accident and compile a report using Form XX. The aim of the investigation should be to identify the root cause and to prevent the same thing happening again. Use Form F008 for recording and investigating near misses and accidents. Undertake a review of the near miss and accident procedure, and update training requirements if necessary.

'Emergency' Operating Conditions (System out of control)
In the event of a major incident focus on the safety of personnel and do not implement any steps if there is a risk to human health.

Acceptable Performance Criteria

A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance.

Measure	Target / Requirement
• Check for presence of spill kits • Check liquids are provided with correct bunding • Check liquid transfer techniques are working correctly	• Weekly

Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Form F007 Site Inspection sheets	Office
Form F003 Preventative Maintenance Programme	Office
Form F004 Spill Kit training records	Office
Form F008 for Recording near misses, accidents and incidents	Office

AWD Group Ltd EMS

PROCEDURE TITLE	**Reporting Environmental Incidents**
Version	**3**
Date	**October 2022**
Owner	

Link to Environmental Aspects Assessment

Environmental Aspect Ref:	Aspect Description	Link to Aspect & Impact Assessment
All	Documenting environmental incidents	Records of actions taken during an incident need to be maintained for NRW and insurance purposes

Overview & Scope

Description
Actions to be followed if there is an actual or potential pollution incident

Legal & Other Requirements

Requirement	Description
Permit condition 4.3	Notification of NRW of actual or potential pollution incident
Permitting guidance	

Responsible Persons

Responsibility	AWD Responsible Person	Contact No (if applicable)
Procedure owner		
Implementation of procedure		
Responsibility	**Other Responsible Person (e.g. Sub-contractor)**	**Contact No**

Procedure

Steps to be taken
All employees are responsible for reporting environmental incidents to the Site Manager. The Permit requires actual or potential pollution incidents to be reported to NRW within 24 hrs. ➢ Use form SF08 for recording Incidents Incident Report template (Form F008) as soon as possible after the verbal report has been made. Incidents could include: ☐ Actual or imminent risk of significant environmental pollution. ☐ Breach of statutory limits or Site Licence Conditions. ☐ Any incident that must be reported to the enforcing authorities. ☐ Deposit of significant amounts of a non-permitted waste in skips or directly at the site. ☐ Any incident that could foreseeably lead to serious public complaint or media enquiries. ☐ Major damage to plant, equipment, premises including fires on-site. ☐ Severe injury of the public. ☐ Serious near-misses which could have foreseeably lead to any of the above. A central file containing all Incident Reports will be maintained and will be reviewed at regular intervals to identify whether any trends or patterns can be discerned. Where an incident is required to be reported to the enforcing authorities, the Site Manager must ensure that this report has been made within the required time period and in the specified format.

Acceptable Performance Criteria
A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance

Measure	Target / Requirement

Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Form F008 Incident Report Form	

BYASS WORKS WASTE TRANSFER FACILITY

Environmental Permit Variation Application

ENVIRONMENTAL ACCIDENT MANAGEMENT PLAN (EAMP)

Appendix 2
Forms relevant to EAMP

Form SF02

AWD Group Ltd EMS

FORM TITLE	**Recording Non-Compliant Wastes**
Version	**3**
Date	**October 2022**
Owner	

Link to Procedures

Procedure Ref:	Procedure description

Date and Time:	Reason for non-compliance e.g. odour, visual contamination, too wet etc.
Waste Description:	Action Taken:
Name and Address of Waste Producer	Waste Carrier Details, Vehicle Type and Vehicle Registration
Waste Transfer Note Number	Final Waste Destination
NRW Contacted?	

Form SF06

AWD Group Ltd EMS

FORM TITLE	**Site Evacuation Drills**
Version	**3**
Date	**October 2022**
Owner	

Link to Procedures

Procedure Ref:	Procedure description
P003	Documenting evacuation drills

A drill is intended to ensure, by means of training and rehearsal, that in the event of an incident warranting site evacuation:

- The people who may be in danger act in a calm and orderly manner. The appointed personnel undertake their key tasks
- The means of escape are used in accordance with a pre-determined and practised plan. If evacuation becomes necessary, staff should be aware of what to do.
- Normal, advance warning should **not** be given of the drill.
- Every opportunity should be taken to learn lessons from the drill and to reinforce staff training where gaps are identified.

It is good practise to appoint a small number of people to observe the drills and highlight areas of concern. It is important that all managers are aware of the procedures, as employees will look towards them in an emergency.

EVACUATION LOG SHEET

Date:	**Reason for Evacuation:**
Time of Evacuation Alarm:	
Time Taken To Evacuate:	
Time Taken To Conduct Roll Call:	
Anyone unaccounted for:	
Were any escape routes blocked?	
If yes, with what?	
Was all machinery switched off?	
If not, why?	
Alarms reset?	
Feedback from employees?	

Evacuation drills should be carried out at least once in every period of 6 months, unless otherwise specified.

Form SF08

AWD Group Ltd EMS

FORM TITLE	**Accident and Incident Record**
Version	**3**
Date	**October 2022**
Owner	

Link to Procedures

Procedure Ref:	Procedure description

Date and time of the incident	
What happened, what was it about?	
Was anyone else aware of this – other witnesses? If so who?	
What caused it?	
What action did you take to fix the problem? Were external agencies involved?	
What have you done to make sure that it does not happen again?	
Was there any significant pollution – for example: oil entering a surface water drain. If so what?	
If there was then you must notify e NRW ASAP 0300 065 3000 Have you done so?	Yes/No/not applicable Time: Date: NRW Incident number:
Please print your name and sign	

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