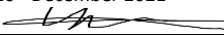




Environmental Management System

Report compiled by:	Gareth Danter-Hill	Environmental Focus Ltd
Customer:		S L Recycling Ltd
Requirement:	EMS	Variation application
Date of Submission:	10 th December 2021	
Signature:		Gareth Danter-Hill
Version number and date:	Version 4-schedule 5 update	April 2023



Copyright Disclaimer

All material on the pages within this report is the property of Environmental Focus Ltd. Any reproduction of the material in any form is only permitted with full written authorisation. The report and its contents are for the use at the location outlined within the document and for the named client only. This document has been prepared in good faith with care and diligence, based on information provided by the client or known to be available at the time. The document fully satisfies the agreed work profile.

CONTENTS

1	INTRODUCTION	4
1.1	Background	4
1.2	The Site	4
2	OPERATIONS AND ACTIVITIES	5
2.2	Waste Storage Duration.....	7
3	LIST OF PERMITTED WASTES	8
3.1	Household, commercial and industrial	Error!
	Bookmark not defined.	
3.2	Metal Recycling.....	Error!
	Bookmark not defined.	
3.3	Wood recycling	Error!
	Bookmark not defined.	
3.4	End of Life Vehicle Recycling.....	Error!
	Bookmark not defined.	
4	WASTE ACCEPTANCE	15
4.2	Waste Transfer Station Enclosure.....	17
4.3	Scrap Metal, Vehicle Storage, Depollution and Dismantling Area	18
4.4	Wood Waste for recovery.....	19
5	NON-CONFORMING WASTE	19
6	LEAKS AND SPILLAGES	20
7	SITE RECORDS.....	21
8	MAINTENANCE	21
9	ENVIRONMENTAL ACCIDENT AND INCIDENTS.....	22
10	FIRE EMERGENCY PLAN.....	23
11	TRAINING	23
12	COMPLAINTS	23
13	SITE DIARY.....	25
14	AUDITS.....	25

DRAWINGS

Site plan attached

APPENDICES

Appendix 1	Site plan
Appendix 2	Record of Non-conformance
Appendix 3	WAMITAB
Appendix 4	General Waste Management
Appendix 5	Complaints Record
Appendix 6	Preventative Maintenance Checklist
Appendix 7	Maintenance Record
Appendix 8	Inspection Record
Appendix 9	Environmental Accident and Incident Record
Appendix 10	Training Record
Appendix 11	Training Needs Checklist
Appendix 12	Accident Management Plan

1 INTRODUCTION

1.1 BACKGROUND

- 1.1.1 This Environmental Management System (EMS) defines the waste types and operations that are undertaken at Unit 1, Pontyfelin Industrial Estate, New Inn, Pontypool, Torfaen, NP4 0DQ (*the Site*).
- 1.1.2 This EMS is submitted in support of an application to vary the current Standard Rules Environmental Permit, issued July 2019 ref: EPR/BB32299FN, which authorises activities that correspond to those specified in SR2008 No 3 (household, commercial and industrial waste transfer station with treatment) and SR2012 No 14 (metal recycling, vehicle storage, depollution and dismantling (authorised treatment) facility, to a Tier 3 Bespoke Environmental Permit. The application is submitted on behalf of SL Recycling Ltd, who operate the Site (*the Operator*).
- 1.1.3 The Operator intends to accept a greater range and greater quantities of materials, and, in light of the presence of a non-statutory designated Site of Importance for Nature Conservation (SINC), that being Pont-y-felin verge and ditch, within 50m of the Site's boundary, the Site does not comply with the appropriate Standard Rules to allow for this activity (SR2011 No.4 Treatment of Waste Wood for Recovery). As such, a Tier 3 Bespoke Permit is required for the Site to operate compliantly.
- 1.1.4 The variation is also made for the Operator to add the external shredding of metal wastes to their current permit. No additional EWC or R and D codes are to be added as part of this application, in fact many are removed.

1.2 THE SITE

- 1.2.1 Historically this Site has been an operational waste facility with a High Temperature Incinerator for a number of years up until closure in 2003. Subsequently the Site remained unoccupied since its closure until it was redeveloped by the Operator for the purposes of operating as a waste transfer station (WTS).
- 1.2.2 In preparation for the issue of their current Standard Rules Permit, the Operator redeveloped the Site to incorporate a waste transfer station enclosure, external wood storage bay, metal storage bays, metal processing bays and a vehicle dismantling and depollution bay. These are constructed with Legato LG8 blocks which have been designed to be fire resistant in accordance with Fire Prevention Plans: Environmental Permits (<https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits/fire-prevention-plans-environmental-permits>). Full details are included in the Fire Prevention Plan (SLR_FPMP), which supports the application. An existing building, which the Operator has renovated and retrofitted with cladding, serves as a cardboard storage hall. Reference should be made to the site layout document (SLR_site_layout) attached to this application for a visual representation of the site.
- 1.2.3 In view of the potential of noise generation created by the additional activity that may impact nearby sensitive receptors, a Noise Impact Assessment was undertaken over a week-long period to ascertain noise levels created. The Noise Impact Assessment (NIA) was carried out by an Independent Acoustic Consultancy Practice, Hunters Acoustics. The report was finalised on 15th October 2021 and

concluded that overall, a low impact is produced by the on-Site activities in terms of noise levels witnessed locally.

- 1.2.4 All operations on-Site associated with recycling activities, are carried out during reasonable daytime hours only (08:00 – 17:00 hrs Monday – Friday and 08:00 – 12:00 hrs Saturday with no operations on Sunday or Bank Holidays), in order to not cause a nuisance to neighbouring receptors.
- 1.2.5 The Site proposes to accept waste streams at a lesser range but at greater quantities to those stipulated in the current permit, hence the requirement to apply for a Bespoke Environmental Permit. A purpose-built enclosed building has been constructed on the Site to serve as a waste processing hall. Wastes are not burnt on Site at any time.
- 1.2.6 In addition, the Site accepts, processes and stores metal in order to provide storage and a depollution and dismantling facility for end-of-life vehicles (ELV's). All waste streams accepted on the Site are listed in Table 1.
- 1.2.7 The purpose of the application is to cater for the demand and the resultant increase in waste throughput in order to improve waste management and control, facilitate improvements in recycling rates and ensure a high standard of environmental protection.
- 1.2.8 This application has assessed the risk through a H1 assessment, the entire site was considered for this to gain a cumulative view of all operations and not just the new shredding activity applied for. The risk assessment and fire prevention & mitigation plan are therefore indicative of the site as a whole and inclusive of the shredding activity.

Commented [S81]: Need to be careful. If you imply that the site is accepting wastes beyond its authorised permit limits, you are effectively saying the operator is committing a criminal offence – technically a breach of a condition is a criminal offence

2 OPERATIONS AND ACTIVITIES

- 2.1.1 The Waste Transfer Station Enclosure incorporates a vehicle entry point for the deposition of household, commercial and industrial mixed wastes. The enclosure is constructed with Legato L8 blocks to either side and the rear to a height of 5m with openings to the front to ensure the 'first in, first out' principle is adhered to. Installed on top of the walls is a bespoke fabric waste management shelter manufactured from polyethylene non-corrosive cladding.
- 2.1.2 Household, commercial and industrial wastes for recovery or disposal off-Site are listed in Table 2. They are manually sorted, separated in the Waste Transfer Station Enclosure prior to the transfer to the relevant waste bay on-Site according to waste type to be bulked up. Selected recyclables are removed from the loads where deposited and any non-recyclable materials are transported in one of the facilities trucks to an authorised site for energy from waste.
- 2.1.3 Metal recycling involves the sorting, separation, grading, shredding, shearing, baling, compacting, granulating of cables and cutting (using only hand-held equipment) of ferrous metals or alloys and non-ferrous metals for recovery. Metal wastes accepted at the Site are listed in the table below, this table is further split into what metals will be put through the shredder. Storage and recovery of waste motor vehicles also takes place on Site in a designated bay with treatment comprising of dismantling and depollution only. The shells of the ELVs are baled before being removed from site.
- 2.1.4 Only metals risk assessed to be low dust-producing will be fed into the shredding operation.

- 2.1.5 Metals to be shredded will be stored in a dedicated bay prior to loading into the machine. The pile can be inspected readily by the site supervisor to ensure only wastes that are permitted are being shredded.
- 2.1.6 The metal storage and treatment area for the shredder is serviced by an impermeable service that is linked to a sealed drainage system. The water that runs through the metal waste is discharged into an internal lagoon. The base and side walls of the lagoon are lined with an impermeable plastic liner, and as required, water is tankered off-Site to the local wastewater treatment facility.
- 2.1.7 The shredder can treat up to 250T per day, although this will not be done as operations will be limited to 75T/day maximum.
- 2.1.8 The management onsite will monitor the daily amounts based on output loads. The receiving bay for the shredded scrap when full allows for the total storage of 4 articulated lorry loads. The loads are 18T each, so the bay holds a maximum of 72T. When the bay is full, the shredding operation stops for the day.
- 2.1.9 The shredder will operate by loading larger pieces of scrap with items of plant (360 grab or similar) already used routinely on site. Drop heights will be minimised to reduce the level of noise where required. The metal then feeds into the shredding plant via conveyors and is shredded into smaller metal pieces to aid a more efficient and effective recovery process. The metal is ejected from the shredder into a dedicated storage bay before being moved ready for export from site. All areas of storage are edged by 4m high walls made to satisfy the required A1 fire rating.
- 2.1.10 The shredder, located in the section of the site furthest away from the closest residential receptors has numerous physical barriers between them (on and off site) to reduce the levels of both noise and dust that leave the site. Acoustic barriers have been installed to surround the shredder in the direction of the closest receptor. They have also been constructed on the site boundary.
- 2.1.11 End of Life Vehicles are received via the weighbridge, where they are inspected for quality and contamination prior to transfer to designated depollution bays within the Site. These bays are fitted with interceptor drainage systems to eliminate the possibility of ground contamination. The motor vehicles are manually depolluted. Waste streams accepted at the facility that are associated with End of Life Vehicles are listed in the table below.
- 2.1.12 Separate bays are used for the storage of wood and metal. A fully sealed enclosed skip is also used for storing batteries and metal filings as per types listed in Table 1 and is cited in the external yard area on the impermeable concrete surface covering the entire Site which drains to surface water lagoon, via a 3-stage petrol/oil interceptor. They are positioned as such so that they are readily accessible should there be a fire inside or if they need to be removed from the Site or to the quarantine area.
- 2.1.13 The drainage system on site is a sealed system which collects flow from a series of channels across the yard. The flow drains through an oil interceptor before being held in the on-site lined lagoon. From here, an overflow system allows the lagoon to trickle into a further sealed sump from where the water is pumped out for use internally (daily for plant and machines to operate) and for topping up the water storage tanks and bowzers when needed. When required, if the overflow system gets

near full (monitored daily), the sump is emptied via tanker and taken to an appropriately licensed facility for disposal. Maintenance of the system is covered below.

- 2.1.14 Hazardous wastes from vehicle depollution are stored and dispatched in separate areas of the Site to avoid mixing of the two. The Operator is aware that under the Hazardous Waste (England and Wales) Regulations 2005, Regulation 18 prohibits the mixing of hazardous waste with non-hazardous waste.
- 2.1.15 Lead acid batteries are sorted and separated from other wastes but are not treated. They are stored in an impermeable enclosed skip, with acid resistant base and a cover to prevent rainwater ingress. The maximum quantity of hazardous waste treated for disposal or recovery will not exceed 10 tonnes per day whilst the maximum quantity stored at one time will not exceed 50 tonnes. This does not include end of life vehicles awaiting depollution. No more than 25 tonnes of intact waste vehicle tyres are stored on Site at any one time.
- 2.1.16 The waste transfer station enclosure has an impermeable base and is surrounded by a kerbed area, which drains by gravity to the lagoon, via the interceptor. The kerbed area is aligned with the Site boundary, which incorporates the enclosure. The purpose of the design is to ensure that rainwater and any inadvertent liquors or fire water are fully contained and drained to the lined lagoon. A Fire Prevention Plan has been prepared in support of the permit application.
- 2.1.17 Wood wastes listed in the table below are stored securely in the designated bay shown in the appended site plan. Treatment involves solely of sorting, and separation for recovery.
- 2.1.18 No substances that would be classified as 'dangerous' under the Control of Major Accident Hazards (COMAH) Regulations will be used at the Site for the operation of the facility.

2.2 WASTE STORAGE DURATION

- 2.2.1 The use of first in first out principles ensures the Site operates a rapid turnover of waste materials and that the waste transfer station bays are emptied every month so that all materials are removed, and the bays are totally emptied (including the corners of the bay). This prevents the potential for any build-up of material and ensures that any degradable materials are rapidly removed.
- 2.2.2 The waste transfer station enclosure has a design capacity capable of separating up to 60t/day of incoming material. The maximum period of storage is 2 days post processing before removal of waste. Incoming wastes are processed on a first in first out basis, albeit that any wastes that have been placed in quarantine will be prioritised for removal.
- 2.2.3 Site cleaning procedures include sweeping out the bays and skips, including the corners, to ensure all material is removed and potentially combustible, odorous or dusty residues do not remain in-situ. Operational staff record the housekeeping of the bays and skips on the appropriate checklist, maintained in the Site office, in order to adhere to the maximum emptying and cleaning frequency of 1 month.
- 2.2.4 Waste streams are separated upon arrival in order to ensure incompatible wastes are stored and treated separately. All waste metals and vehicles are stored in adjacent bays constructed from fire-

resistant concrete Legato L8 blocks which are located away from the waste transfer station enclosure containing incompatible household, commercial and industrial wastes.

- 2.2.5 Material contained within the waste transfer station enclosure are separated manually or by no longer than 1 day from deposit to ensure incompatible wastes are segregated from one another and any unstable wastes are stored appropriately either within a dedicated container for batteries or the quarantine area. Wastes are then transferred to the relevant bay on-Site according to the waste type.
- 2.2.6 All metal wastes, including ELV's will be stored for no longer than 2 ½ weeks. Any treatment or process carried out on such wastes will take place within this interval. Household, commercial and industrial waste streams therefore remain on-Site for a shorter timeframe than metal wastes, ELV's and wood.
- 2.2.7 The site management are aware that when reducing the size of material the risk of self-heating can increase. However, with the low storage time on site due to the high turnover of material, this is extremely unlikely to occur.
- 2.2.8 The specific storage times for each type of waste (pre and post processing) are highlighted in the submitted FPMP.
- 2.2.9 In the event of closedown, waste will be diverted to alternative sites in the area. The preferred site is SL Recycling's sister facility in Hengoed, which has the benefit of a Bespoke Environmental Permit.

3 LIST OF PERMITTED WASTES

3.1 EWC LIST

- 3.1.1 Permitted wastes are limited to those detailed in the table below (descriptions in *italics* are to be added as part of this variation), split per section as listed.

Waste Acceptance for Household, Commercial and Industrial Waste Transfer Station with Treatment (50,000T/year throughput).

Waste Code	Description
02	Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing, food preparation and processing
02 01	Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 10	waste metal
10	Wastes from thermal processes
10 12	Wastes from manufacture of ceramic goods, bricks, tiles and construction products
10 12 08	Waste ceramics, bricks, tiles and construction products (after thermal processing)
10 13	Wastes from manufacture of cement, lime and plaster and articles and products made from them

Waste Code	Description
10 13 14	Waste concrete only
12	Wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01	wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01 01	ferrous metal filings and turnings
12 01 03	non-ferrous metal filings and turnings
12 01 17	waste blasting material other than those mentioned in 12 01 16
15	Waste packaging
15 01	Packaging (including separately collected municipal packaging waste)
15 01 01	paper and cardboard packaging
15 01 02	Plastic packaging
15 01 03	Wooden packaging
15 01 04	Metallic packaging
15 01 05	Composite packaging
15 01 06	Mixed packaging
15 01 07	Glass packaging - Clean glass only
16	Wastes not otherwise specified in the list
16 01	end-of-life vehicles from different means of transport [including off-road machinery] and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13,14, 16 06 and 16 08)
16 01 03	end-of-life tyres
16 02	wastes from electrical and electronic equipment
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 03	off-specification batches and unused products
16 03 04	inorganic wastes other than those mentioned in 16 03 03
16 06	batteries and accumulators
16 06 05	other batteries and accumulators
17	Construction and demolition wastes (including excavated soil from contaminated sites)
17 01	Concrete, bricks, tiles and ceramics
17 01 01	concrete
17 01 02	Bricks
17 01 03	Tiles and ceramics
17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02	Wood, glass and plastic
17 02 01	Wood
17 02 02	Clean glass only
17 02 03	Plastic
17 04	metals (including their alloys)

Waste Code	Description
17 04 01	Copper, bronze, brass
17 04 02	Aluminium
17 04 03	Lead
17 04 04	Zinc
17 04 05	Iron and steel
17 04 06	Tin
17 04 07	Mixed metals
17 04 11	Cables other than those mentioned in 17 04 10
17 08	Gypsum based construction material
17 08 02	Gypsum only other than that mentioned in 17 08 01
17 09	other construction and demolition wastes
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
19	Wastes from waste management facilities, off-site waste water treatment plants and preparation of water intended for human consumption/industrial use
19 01	wastes from incineration or pyrolysis of waste
19 01 02	ferrous materials removed from bottom ash
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 01	Paper and cardboard
19 12 02	Ferrous metal
19 12 03	Non-ferrous metal
19 12 04	Plastic and rubber
19 12 05	Glass
19 12 07	Wood other than that mentioned in 19 12 06
20	Municipal wastes (household waste and similar commercial, industrial
20 01	Separately collected fractions
20 01 01	Paper and cardboard
20 01 02	Clean glass only
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35
20 01 38	wood other than that mentioned in 20 01 37
20 01 39	Plastics
20 01 40	Metals
20 03	Other municipal wastes
20 03 01	Mixed municipal waste
20 03 07	Bulky waste

Waste Acceptance for Metal Recycling, Vehicle Storage, Depollution and Dismantling (authorised treatment) Facility (60,000T/year throughput with less than 10,000T being ELVs).

Waste Code	Description
01	Waste resulting from exploration, mining, quarrying and physical and chemical treatment of minerals
01 01	Wastes from mineral excavation
01 01 01	wastes from mineral metalliferous excavation
01 01 02	wastes from mineral non-metalliferous excavation
01 03	wastes from physical and chemical processing of metalliferous minerals
01 03 06	tailings other than those mentioned in 01 03 04 and 01 03 05
02	Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing, food preparation and processing
02 01	wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 10	waste metal
10	Wastes from thermal processes
10 02	Wastes from the iron and steel industry
10 02 10	Mill scales
10 03	Wastes from aluminium thermal metallurgy
10 03 02	Anode scraps
10 03 05	Waste alumina
10 03 16	Skimmings other than those mentioned in 10 03 15
10 03 18	Carbon-containing wastes from anode manufacture other than those mentioned in 10 03 17
10 10	wastes from casting of non-ferrous pieces
10 10 06	casting cores and moulds which have not undergone pouring other than those mentioned in 10 10 05
10 10 08	casting cores and moulds which have undergone pouring other than those mentioned in 10 10 07
11	Wastes from chemical surface treatment and coating of metals and other materials; non-ferrous hydro metallurgy
11 02	wastes from non-ferrous hydrometallurgical processes
11 02 03	wastes from the production of anodes for aqueous electrolytical processes
11 02 06	wastes from copper hydrometallurgical processes other than those mentioned in 11 02 05
11 05	wastes from hot galvanising processes
11 05 01	hard zinc
12	Wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01	wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01 01	ferrous metal filings and turnings
12 01 03	non-ferrous metal filings and turnings
15	Waste packaging, absorbents, filter materials, wiping cloths and protective clothing not otherwise specified

Waste Code	Description
15 01	Packaging (including separately collected municipal packaging waste)
15 01 04	metallic packaging
16	Wastes not otherwise specified in the list
16 01	end-of-life vehicles from different means of transport [including off-road machinery] and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13,14, 16 06 and 16 08)
16 01 04*	End of life vehicles
16 01 17	ferrous metal
16 01 18	non-ferrous metal
16 01 22	discarded components not otherwise specified
16 06	batteries and accumulators
16 06 01*	lead batteries
17	Construction and demolition wastes (including excavated soil from contaminated sites)
17 04	metals (including their alloys)
17 04 01	copper, bronze, brass
17 04 02	Aluminium
17 04 03	Lead
17 04 04	Zinc
17 04 05	iron and steel
17 04 06	Tin
17 04 07	mixed metals
17 04 11	cables other than those mentioned in 17 04 10
19	Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use
19 01	wastes from incineration or pyrolysis of waste
19 01 02	ferrous metals removed from bottom ash
19 10	wastes from shredding of metal-containing wastes
19 10 01	iron and steel waste
19 10 02	non-ferrous waste
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 02	ferrous metal
19 12 03	non-ferrous metal
20	Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions
20 01	separately collected fractions (except 15 01)
20 01 33*	lead batteries
20 01 40	Metals

Waste Acceptance for Treatment of Wood Waste for Recovery (15,000T/year throughput).

Waste Code	Description
15	Waste packaging
15 01	Packaging (including separately collected municipal packaging waste)
15 01 03	Wooden packaging
17	Construction and demolition wastes (including excavated soil from contaminated sites)
17 02	Wood, glass and plastic
17 02 01	Wood
17 09	other construction and demolition wastes
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
19	Wastes from waste management facilities, off-site waste water treatment plants and preparation of water intended for human consumption/industrial use
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 07	Wood other than that mentioned in 19 12 06
20	Municipal wastes (household waste and similar commercial, industrial
20 01	Separately collected fractions
20 01 38	wood other than that mentioned in 20 01 37

3.1.2 Permitted wastes to be shredded are limited to those detailed in the Table below (descriptions in *italics* are to be added as part of this variation). All waste is accepted in accordance with the Waste Acceptance Procedures detailed below.

3.1.3 Waste metals to be shredded will originate from any of the sections listed above.

Waste Code	Description
01	Waste resulting from exploration, mining, quarrying and physical and chemical treatment of minerals
01 01	<i>Wastes from mineral excavation</i>
01 01 01	<i>wastes from mineral metalliferous excavation</i>
01 01 02	<i>wastes from mineral non-metalliferous excavation</i>
01 03	<i>wastes from physical and chemical processing of metalliferous minerals</i>
01 03 06	<i>tailings other than those mentioned in 01 03 04 and 01 03 05</i>
02	Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing, food preparation and processing

Waste Code	Description
02 01	Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 10	waste metal
10	Wastes from thermal processes
10 02	Wastes from the iron and steel industry
10 02 10	Mill scales
10 03	Wastes from aluminium thermal metallurgy
10 03 02	Anode scraps
10 03 05	Waste alumina
10 03 16	Skimmings other than those mentioned in 10 03 15
10 03 18	Carbon-containing wastes from anode manufacture other than those mentioned in 10 03 17
10 10	wastes from casting of non-ferrous pieces
10 10 06	casting cores and moulds which have not undergone pouring other than those mentioned in 10 10 05
10 10 08	casting cores and moulds which have undergone pouring other than those mentioned in 10 10 07
11	Wastes from chemical surface treatment and coating of metals and other materials; non-ferrous hydro metallurgy
11 02	wastes from non-ferrous hydrometallurgical processes
11 02 03	wastes from the production of anodes for aqueous electrolytical processes
11 02 06	wastes from copper hydrometallurgical processes other than those mentioned in 11 02 05
11 05	wastes from hot galvanising processes
11 05 01	hard zinc
12	Wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01	wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01 01	Ferrous metal filings and turnings
12 01 03	Non-ferrous metal filings and turnings
12 01 13	welding wastes
12 01 21	spent grinding bodies and grinding materials other than those mentioned in 12 01 20
15	Waste packaging
15 01	Packaging (including separately collected municipal packaging waste)
15 01 04	Metallic Packaging
16	Wastes not otherwise specified in the list
16 01	end-of-life vehicles from different means of transport [including off-road machinery] and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13,14, 16 06 and 16 08)
16 01 17	ferrous metal
16 01 18	non-ferrous metal
17	Construction and demolition wastes (including excavated soil from contaminated sites)

Waste Code	Description
17 04	metals (including their alloys)
17 04 01	Copper, bronze, brass
17 04 02	Aluminium
17 04 03	Lead
17 04 04	Zinc
17 04 05	Iron and steel
17 04 06	Tin
17 04 07	Mixed metals
17 04 11	Cables other than those mentioned in 17 04 10
19	Wastes from waste management facilities, off-site waste water treatment plants and preparation of water intended for human consumption/industrial use
19 01	wastes from incineration or pyrolysis of waste
19 01 02	ferrous materials removed from bottom ash
19 10	wastes from shredding of metal-containing wastes
19 10 01	iron and steel waste
19 10 02	non-ferrous waste
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 02	ferrous metal
19 12 03	non-ferrous metal
20	Municipal wastes (household waste and similar commercial, industrial)
20 01	Separately collected fractions
20 01 40	Metals

4 WASTE ACCEPTANCE

- 4.1.1 All vehicles delivering wastes to the Site stop at the weighbridge and are weighed.
- 4.1.2 The total annual throughput of wastes equates to 110,000 tonnes. This amalgamates the required annual quantities from the household, commercial and industrial waste transfer station, the end-of-life vehicles, metal recycling, wood waste for recovery and hazardous linked to depollution.
- 4.1.3 Checks are made to establish whether the haulier is a Registered Waste Carrier or has a valid exemption from registration. Only registered carriers or those who are lawfully exempt from registration are permitted to use the Site.
- 4.1.4 Waste is not accepted if for any reason there is insufficient storage capacity available or if the Site is inadequately manned. This is to ensure that all waste is managed effectively to prevent pollution or loss of amenity.

- 4.1.5 Weighbridge staff are suitably trained and follow documented procedures. The weighbridge operator examines waste descriptions at the weighbridge and the information is checked against the pre-acceptance documentation, six figure European Waste Catalogue Code(s) and other details on the Waste Transfer Note or Season Ticket (for non-hazardous waste deliveries) or Hazardous Waste Consignment Note (for hazardous wastes) as well as against the waste types and quantities permitted by the Environmental Permit.
- 4.1.6 Every delivery of waste is recorded, detailing the date of the transaction, weight, waste type, registered carrier, Waste Transfer Note number, Hazardous Waste Consignment Note (as applicable) vehicle registration and other pertinent information against a unique reference number. It allows for tracking of wastes, the generation of reports and waste returns, as well as providing comprehensive, auditable information.
- 4.1.7 The facility benefits from the integration of the FRED software system in the weighbridge office which enables the monitoring of the weights of waste feedstock to ensure the Site does not exceed the amounts stipulated in the permit. The system also has ID Capture to allow compliance with the Scrap Metal Dealers Act of 2013 to enable safe storage and renewal reminders. EWC reports can also be generated either by the postcode, region or individual product of the source of the waste.
- 4.1.8 In view of the nature of the waste streams accepted at the Site, it is not anticipated that there will be seasonal variations in demand or supply. As a consequence of 'zero landfill' and the avoidance to dispose of waste to landfills coupled with the promotion of re-use and recycle, the need for recycling facilities such as SL Recycling has increased and it is considered that the resilience of the supply chain and end users is viable in foreseeable market conditions.
- 4.1.9 A banksman instructs lorry drivers to reverse into the appropriate bay within the Site for off-loading according to the type of waste being delivered to ensure materials are stored and processed separately.
- 4.1.10 A visual inspection of the contents of all waste loads, including those received in enclosed containers, is made during deposit.
- 4.1.11 Any discrepancies found as a result of the checks detailed above results in the vehicle being refused/reloaded whilst some, or all, of the following supplementary management decisions are taken:
- Referral to a Technically Competent Manager (TCM) on site;
 - Referral to the waste producer to confirm the nature of the waste load;
 - Referral to the waste carrier's base;
 - Referral to Natural Resources Wales;
 - Redirection of delivery vehicle off site, to a suitably authorised facility; and
 - If the waste has been discharged on the floor, removal of the waste to the secure quarantine area, prior to off-site removal either to the waste producer or suitably authorised facility.

4.2 WASTE TRANSFER STATION ENCLOSURE

- 4.2.1 The waste transfer station enclosure comprises of walls to either side and the rear constructed of Legato L8 blocks and a canopy roof for processing general waste. The maximum storage is two days which also includes the processing time. For mixed material brought to the Site there is the capability for up to 60 tonnes/day to be processed with up to 40 tonnes/day to be disposed as waste at an appropriate authorised site.
- 4.2.2 Waste delivery vehicles are directed to reverse into the building. Waste loads are tipped onto the floor and bulked up within the confines of the building using a loading shovel or similar by a suitably trained Site operative. Wastes are stored in the enclosure prior to sorting and separation into different components for recovery and up to a maximum of 40 tonnes/day of residual waste for disposal/further recovery at an appropriately authorised site. All waste deposit, separation, bulking up, storage and loading for off-Site removal or transfer to wood storage pile takes place within the enclosure.
- 4.2.3 The walls of the enclosure are 5m high and all material stored inside do not exceed this height therefore giving a freeboard of 1m to the top of the canopy. The enclosure is isolated from other stockpiles on-Site.

Pest Control Management

- 4.2.4 Due to the nature of the waste accepted there is potentially the need for measure to ensure that pests do not become an issue for the site. At present, there are no identified issues with pests throughout the site and specifically within the mixed waste storage/processing area. However, to ensure that this remains the case, the site will adopt several procedures across the area to maintain high standards ensuring pests do not become a problem.
- 4.2.5 The operative who works within the waste transfer enclosure is tasked with monitoring for pests (flies, birds, rats). The monitoring is done actively throughout the day as the operative is located within the area where pests would be most apparent. Outside of this, he checks the perimeter of the enclosure 3 times per day, once before operations begin as this is when the site is quiet and pests are most likely to be noticed, after the lunch break as this is similarly quiet, finally at the end of the shift when undertaking the fire watch within his area. Any sightings of pests/vermin are recorded on the check sheets and reported to site management.
- 4.2.6 If a particular waste type or load is received that could see an increase in pests or flies on site, it will be identified and removed to firstly the sealed skip before being removed from site that same day. This load will also be reported to site management so that they can speak with the customer who sent it to prevent the material being sent again.
- 4.2.7 Pest control contractors are used to place traps in strategic places around the site. The main area of focus is the mixed waste enclosure as this carries the highest risk. The contractor visits site fortnightly at present as part of a planned programme to both check the traps that are in place, and re-bait if necessary. If pest activity is noted to increase, the frequency of visits will be increased to weekly, and the number of traps used will also be increased within the problematic area.
- 4.2.8 If birds become the more common problem, a professional scaring contractor will be employed to

visit the site to deter the birds from the area.

- 4.2.9 Due to the relatively enclosed nature of the area, netting is unlikely to be required. However, if the cover of the enclosure doesn't prevent birds from landing within the material, a net will be constructed above the waste but below the canopy to prevent them from getting to the material.
- 4.2.10 The effective transfer of the material from this section of the site will also deter pests. The material is removed from the enclosure within a 48hr timeframe post acceptance and so the creation of breaking down, odorous material is prevented. This will lower the risk of pests substantially.

4.3 SCRAP METAL, VEHICLE STORAGE, DEPOLLUTION AND DISMANTLING AREA

- 4.3.1 The attached site plan shows the external layout of the Site. External bays are used for scrap metal storage, vehicle dismantling and depollution, depolluted car storage and wood storage. Bay walls comprise fireproof LG8 Legato blocks.
- 4.3.2 All externally stored wastes, including the unpolluted cars, depollution and dismantling area, wood storage area and scrap metal storage area comprises impermeable pavement with sealed drainage system to petrol/oil interceptor.
- 4.3.3 Lead acid batteries, e.g. removed from cars during depollution, are stored in a skip with an acid resistant base and cover to prevent ingress of rainwater.
- 4.3.4 Metal filings and turnings are stored in a separate enclosed skip with impermeable base and cover to prevent ingress of rainwater.
- 4.3.5 Vehicle dismantling and depollution activities involves:
- The End of Life Vehicles are received via the weighbridge, where they are inspected for quality and contamination prior to transferal to designated depollution bays within the Site.
 - These bays are fitted with interceptor drainage systems to eliminate the possibility of ground contamination. The motor vehicles are manually depolluted. Batteries, if present, are removed first as a part of on-Site procedures.
- 4.3.6 Metal recycling involves the sorting, separation, grading, shredding, shearing, compacting, granulating of cables and cutting (using only hand-held equipment) of ferrous metals or alloys and non-ferrous metals for recovery. Storage and recovery of waste motor vehicles also take place on Site in a designated bay with treatment comprising of dismantling and depollution only.
- 4.3.7 Metal wastes and ELV's remain on-Site for no longer than 3 weeks which includes storage, processing and treatment as specified above. The height of the storage bays are 5 m and stockpiles do not exceed 4m. A line 1 m below the top of the bay walls is marked clearly to ensure stockpile heights do not exceed 4m in order to prevent fire spreading over the walls. To prevent any fires overlapping the side walls of the bay into adjacent waste stacks, a line clearly painted inside the bay along the floor is positioned 1m from the front to ensure waste piles are not stored beyond this line.
- 4.3.8 The waste bays are separated by fireproof walls constructed with `Legato LG8 blocks. These pertain to A1 fire-resistant classification in accordance with REI 240 standards rendering the Legato blocks

fire-resistant for up to at least 4 hours (specification attached). They have been installed in accordance with the manufacturer's recommendations.

4.4 WOOD WASTE FOR RECOVERY

4.4.1 Waste wood storage sorting and separation activities involves:

- The wood waste material is received via the weighbridge, where it is inspected for quality and contamination prior to transfer to the designated external secured bay within the Site.
- The bay is fitted with impermeable pavement with sealed drainage system to petrol/oil interceptor to eliminate the possibility of ground contamination and the bay walls comprise of LG8 Legato fireproof blocks

4.4.2 The maximum storage of waste is 2 weeks with sorting and separation taking place within the first seven days. With the dimensions 10m x 6m x 4m, the bays have the capability for up to 30 tonnes/day to be processed with up to 30 tonnes/day to be disposed as waste at an appropriate authorised site.

4.4.3 Waste delivery vehicles are directed to reverse into the wood waste bay where waste loads are tipped onto the floor and bulked up within the confines of the bay wall constructed with Legato LG8 blocks using a loading shovel or similar by a suitably trained Site operative. Wastes are stored in the bay prior to sorting and separation into different components for recovery or disposal at an authorised site as appropriate.

4.4.4 The height of the storage bays are 5 m and stockpiles do not exceed 4m. A line 1 m below the top of the bay walls is marked clearly to ensure stockpile heights do not exceed 4m in order to prevent fire spreading over the walls. This also ensures no wastes within the stockpiles exceed the height of the bay walls thus avoids bridging. A line is also clearly marked on the floor across the length of each bay at 1m distance from the front wall to enable any flames or fires spreading to adjacent bays. The waste bays are separated by fireproof walls constructed with Legato LG8 blocks. These pertain to A1 fire-resistant classification in accordance with REI 240 standards rendering the Legato blocks fire-resistant for up to at least 4 hours.

4.4.5 Table 3 of the FPMP provides details of stockpile sizes, volumes and storage times etc

5 NON-CONFORMING WASTE

5.1.1 Any loads arriving at the Site which contain non-permitted waste, or a significant amount of contrary material is rejected prior to unloading. In the unlikely event that a vehicle inadvertently deposits non-permitted waste or a large amount of contrary material, it is re-loaded where possible. Where the vehicle has already left the Site, the non-permitted waste or contrary material is stored in the quarantine area, pending removal of the material to the waste producer or authorised facility.

5.1.2 Material rejected from the Site is issued with a record stating why, when and from which contract the waste was provided. This record is then held on Site for Natural Resources Wales to inspect. In addition, the 'Record of Non-Conformance', Appendix 2, is completed with the record held on Site.

- 5.1.3 Small amounts of contrary material present in loads are removed by hand or machine and temporarily stored in a quarantine skip. Materials in quarantine are removed from Site to a suitably permitted facility, capable of dealing with the waste types as soon as is practicable.
- 5.1.4 In addition to non-conforming wastes, wastes which are malodorous or liquid are not accepted at the Site.
- 5.1.5 Shredder specific risks are focussed mainly on batteries and gas cylinders that may be mixed through the mixed metal wastes. Private customers that bring their own waste to site are asked if any batteries or gas cylinders are within the load. If so, they are asked to remove them and take them with them as they leave. Larger commercial contracts are informed that these materials are not permitted to be within the waste to limit them being added to the skips at the source site.
- 5.1.6 However, there may occasions that they do get mixed with the loads being accepted. There are 3 stages for checks to be undertaken to identify that these items do not get put through the shredder:
- *As the waste is deposited at the site in the requested location, the material is tipped out of the transport vehicle and two site operatives visually check the material on the floor where it is tipped. Any batteries or gas cylinders noticed, are removed, and stored in the appropriate area on site. The metal then gets added to the relevant pile by the grab. If the metal is an ELV, the boot, back seat and under the front seats are checked at tip off point.
 - *The second checkpoint occurs just ahead of the material being loaded into the shredding plant. The metals are spread thinly on the ground by the grab operator next to the shredder and a site operative visually checks through the material for batteries and cylinders. If they are noticed, they are removed and taken to the appropriate storage location on site.
 - *The final check is undertaken by the grab operator, as he picks the material from the feed pile (after being laid thinly out and checked), the materials are visually checked as it's picked up before being directly loaded into the shredding plant.

6 LEAKS AND SPILLAGES

- 6.1.1 Oils and fuels stored on-Site from the depollution process and for maintenance purposes are stored in drums within the depollution bay, they are placed on drip trays to contain any leaks or spillages. They are inspected twice daily at the beginning and end of the working day for any defects or deterioration of the drums, all records are completed as per the checklist in Appendix 8.
- 6.1.2 The containment for the liquids is via a bunded area capable of holding 110% of the total volume of all drums held within. The bunded area then holds a series of drip trays, each with a drum on top of it that can hold 110% of the individual drum total volume, these measures allow for double containment. All drums are stored undercover, within a building and are labelled as per the liquid type being stored within them.
- 6.1.3 A registered facility collects or empty the drums when they are over three-quarters full and transfer off-Site for disposal or recovery.
- 6.1.4 In order to prevent fuels and combustible liquids leaking or trailing from Site vehicles, they are

inspected daily for any leaks. Spill kits are kept in all of the facilities trucks, vans and plant. In addition, there are spill kits in a dedicated unit within the ELV area and in strategic places around the Site. Reference should be made to the site plan for their locations.

- 6.1.5 On receipt of ELV's at the weighbridge, a Site operative inspects the vehicle for leaks or spillages to prevent any fuels or oils being dispersed around the Site. If a leak is identified, it will be contained whilst the vehicle is transported to the de-pollution area and, should there be any spillages, spill kits will be used to absorb the liquid. Once the ELV's have been de-polluted, they are inspected again for any leaks.
- 6.1.6 The materials used for cleaning-up any spillages will be placed in the disposable bag provided in the spill kit and secured with the tie. The bag is then transferred to a relevant licenced facility which accepts such wastes.
- 6.1.7 After an incident or emergency any broken or damaged drums/containers will be disposed of at an appropriately licensed facility and replacements ordered immediately. No ELV processing will be undertaken when there is no appropriate storage vessel on site.

7 SITE RECORDS

- 7.1.1 The Site is managed in accordance with the requirements of the Environmental Permitting (England and Wales) Regulations 2016 by a Technically Competent Person, Becky Turner, who currently holds the WAMITAB Level 4 qualifications for Medium Risk Operator Competence for Non-Hazardous Waste Treatment and Transfer and Medium Risk Operator for Physical Treatment issued on 01/08/2019 and 18/10/2018 respectively.
- 7.1.2 The Site records are maintained and kept secure from loss, damage and deterioration in the Site office.
- 7.1.3 Records of Waste Transfer Notes, Registered Waste Carriers Certificates of all waste loads entering and leaving the Site are recorded on the 'General Waste Management' (Appendix 4) and Waste Returns are produced in a timely manner.
- 7.1.4 A copy of the Environmental Permit is easily accessible by staff members or contractors. Contractors are briefed on the sensitivity of the Site and if not being supervised by Site personnel, require a Site induction.
- 7.1.5 Any complaints received at the Site are recorded on the 'Complaints Record' sheet, Appendix 5.

8 MAINTENANCE

- 8.1.1 All equipment and infrastructure on Site is inspected, serviced and maintained as per manufacturer guidance and 'Preventative Maintenance Checklist', refer to Appendix 6.
- 8.1.2 Natural Resources Wales shall be informed without delay if there is any malfunction, breakdown or failure of equipment or techniques, accident, or fugitive emission which has caused, is causing or may cause significant pollution and cause any significant adverse environmental and health effects. Reference should be made to the Site's Accident Management Plan in Appendix 12.

- 8.1.3 Any required maintenance shall be carried out as soon as is practicable by an approved contractor or suitably trained site operator to ensure continued running of the facility and will be recorded on the 'Maintenance Record', refer to Appendix 7.
- 8.1.4 Daily visual Site inspections for litter, dust and mud accumulating on Site or beyond the Site boundary are undertaken. More thorough weekly inspections are carried out and recorded, 'Inspection Record', Appendix 8. The weekly inspections include a review of:
- Site road and impermeable pavements;
 - Storage areas;
 - Drainage system;
 - Dust;
 - Litter;
 - Mud / dirt;
 - Vermin and insects;
 - Fire (e.g. inspection of firefighting equipment etc.); and
 - Security.
- 8.1.5 Any maintenance works required shall be recorded on the 'Maintenance Record', Appendix 7.
- 8.1.6 The drainage pots and sump are visually checked for integrity each time daily checks are undertaken. A full visual check of the system is performed when the system is emptied, or at least every 6 months (whichever is sooner).
- 8.1.7 The lagoon is checked daily as part of the site checks. If the lagoon is noted as being significantly lower than the previous day (above that which is normal during dry conditions and site use), a full system check will be carried out. The system will be drained, and an approved contractor will be appointed to test/check the integrity of the liner to ensure it remains fit for purpose. If required, the necessary repairs will be undertaken, and the lagoon re-filled. The system will be drained and visually checked routinely every 4 months and the records detailed in Appendix 7 completed.

9 ENVIRONMENTAL ACCIDENT AND INCIDENTS

- 9.1.1 An 'H1 Amenity and Accidents Risk Assessment' (SLR_Env_Risk_assessment) has been prepared for the Site and submitted as part of the permit application.
- 9.1.2 In the event of an environmental accident, the Site has an Accident Management Plan in place, appended as Appendix 12. In addition, an 'Environmental Accident and Incident Record', Appendix 9, which is kept in the Site's office, shall be completed.

10 FIRE EMERGENCY PLAN

10.1.1 Emergency procedures for the Site were developed prior to commissioning of the plant. An Emergency Fire Plan has been constructed and is the subject of training and exercising for all staff engaged at the Site. The Plan sets out the following key points:

- Fire actions and reporting procedures;
- Emergency Procedures including communication and evacuation;
- Identification of off-Site fire assembly point;
- Circumstances under which trained staff may be involved in actions to separate affected waste;
- Diversion of incoming materials;
- Recovery including appropriate removal of burned waste and any residual firewater;
- A copy of the Fire Emergency Plan will be retained at the Site entrance.

10.1.2 Key actions to be undertaken in the event of discovering a fire are detailed below:

- Fire service to be informed immediately of the location of the fire and the waste types involved;
- All personnel must follow Emergency Fire Plan;
- Fire extinguishers and water hoses must only be used by trained fire marshals and when it is safe and appropriate to do so;
- Consider moving unburnt waste to Quarantine area if safe to do so - only trained staff to do this.

11 TRAINING

11.1.1 The Site staff are trained and instructed in the procedures required to operate the Site and are aware of the waste types accepted at the Site as well as relevant Environmental Permit and legislation as required.

11.1.2 The Site is manned and supervised at all times when waste operations are in progress.

11.1.3 A record of all training is kept on the 'Training Record' in accordance with the 'Training Needs Checklist'; Appendix 10 and Appendix 11 respectively.

12 COMPLAINTS

12.1.1 Any complaints received at the Site, e.g. about noise or dust, is reported to the Site Manager or Technically Competent Manager (with appropriate WAMITAB Certificate) who is responsible for the site management, e.g. in the absence of the Site Manager due to illness or annual leave etc.

12.1.2 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 the Complaint Report Form (see Appendix 5). 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).

12.1.3 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 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 (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?

12.1.4 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.

12.1.5 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.

12.1.6 Once actions have been completed the Site Manager or other Technically Competent Person will visit the complaint location to ensure that the cause of complaint has subsided.

13 SITE DIARY

13.1.1 A Site diary consisting of accurate and complete reporting and record keeping is maintained at the Site office at all times and is made available for inspection by National Resources Wales when requested.

14 AUDITS

14.1.1 It is noted that this EMS is required to be:

- Continually improving;
- Assessing prevention of pollution incidents;
- In accordance with the latest regulatory guidance; and
- Assessing environmental objectives independent of the Environmental Permit.

14.1.2 To assess the bullet points the operator shall undertake internal annual audits of the Environmental Management System, environmental performance, objective and targets and future planned improvements.

APPENDICES:

Appendix 1	Drawing No CE-PI-1793-DW01
Appendix 2	Record of Non-conformance
Appendix 3	WAMITAB
Appendix 4	General Waste Management
Appendix 5	Complaints Record
Appendix 6	Preventative Maintenance Checklist
Appendix 7	Maintenance Record
Appendix 8	Inspection Record
Appendix 9	Environmental Accident and Incident Record
Appendix 10	Training Record
Appendix 11	Training Needs Checklist
Appendix 12	Accident Management Plan

APPENDIX 1

Site plan

APPENDIX 2:

Record of Non-conformance

Record of non-conformance	
Date and time non-conformance identified	
What happened, what was it about?	
What caused it?	
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 there was then you must notify Natural Resources Wales. Have you done so?	Yes/No/not applicable Time: Date: NRW Incident number:
Please print name and sign:	

APPENDIX 3:

WAMITAB

APPENDIX 4:

General Waste Management

General Waste Management – Waste Received on Site							
Date	Origin (e.g. Pontypool)	EW Code	Disposal or Recovery Code	State (solid, liquid)	From another waste facility?	Amount (tonnes)	Comments

General Waste Management – Waste Received on Site							
Date	Origin (e.g. Pontypool)	EWC Code	Disposal or Recovery Code	State (solid, liquid)	From another waste facility?	Amount (tonnes)	Comments

APPENDIX 5:

Complaints Record

Complaints Record	
Who made the complaint?	
Name:	
Address:	
Phone No:	
Date and time of complaint	
What caused it?	
Was anyone else aware of this? If so who	
What was the source of the problem, what went wrong? If source is unknown contact a suitably qualified person to investigate.	
What have you done to make sure it won't happen again?	
Was there any significant pollution – for example oil entering a surface water drain?	
If there was then you must notify NRW Have you done so? You must also notify the local NRW Office via email or letter.	Yes/No/not applicable Date and Time: NRW Incident number:
Please print name and sign:	

APPENDIX 6

Preventative Maintenance Checklist

[illegible]

APPENDIX 7:

Maintenance Record

Maintenance Record		
Item*1 :		Due*2:
Completed on	Completed by	Comments
e.g. 13/02/13	A. Person	Blockage in drainage system. Blockage removed.
*1 Item e.g. inspect fences, inspect drainage system		
*2 Due e.g. weekly, daily		

APPENDIX 8:

Daily Site Inspection Record-*integrity and compliance checks*

Site Inspection Record				
Date	Item	Inspected? (yes/no)	Action completed for day? (yes/no)	Follow up comments/actions
	Site road and Operational Area			
	Storage pile sizes			
	Drainage system running freely			
	Litter cleared			
	Mud/dirt on site road and public road			
	Vermin and insects			
	Fire (fire-fighting equipment)			
	Security CCTV			
	Site road and Operational Area for integrity			
	Storage area integrity including fuels/oils			
	Drainage system-integrity			
	Water storage volumes			
	Security fencing			
	Dust accumulation around site (inclusive of plant areas)			

APPENDIX 9:

Environmental Accident and Incident Record

Environmental Accident and Incident Record	
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?	
If there was then you must notify Natural Resources Wales. Have you done so?	Yes/No/not applicable Time: Date: NRW Incident number:
Please print name and sign:	

APPENDIX 10:

Training Record

Training Record							
Employee Name				Job Title			
Training Required	Date Due	Date Done	Passed as competent? (yes/no)	Reviewers signature	Date of refresher	Comments	

APPENDIX 11:

Training Needs Checklist

Training Needs Checklist																
Employee	Training Required*															
	Environmental Awareness					Maintenance / Operations					Accidents and Emergency					Comments
	Permit role and responsibility	Waste Receipt including Duty of Care	Waste treatment and storage	Awareness of local sensitive receptors	Permit conditions and non-confirmances	Maintenance of screener	Maintenance of crusher	Bunds, tanks, pipework			Fire	Spill response	Failure of Services	Dust emissions		

**Insert other training required in available spaces.*

APPENDIX 12:

Accident Management Plan

Site Information

SITE LOCATION DETAILS		
Unit phone no: 01443851361		Mobile contact: 07432017155
Grid Reference of Unit: 51.66029, -3.246685		
Grid Reference of Access 51.660440, -3246397		
EMERGANCY CONTACT DETAILS		
Emergency services: 999		
Local Police: 999		
Natural Resource Wales: 0300 065 3000		
	Office Hours	Out of Hours
Electricity supplier: British Gas	105	105 (emergency number)
Gas supplier: N/A	N/A	N/A
Local authority: Torfaen Council	01495 762200	01495 762200
Oil supplier: Estuary Oils	02920 887973	02920 887973
Water undertaker: Welsh Water	0800 052 0130	0800 052 0130
COMPANY CONTACTS (Out of hours)		
Owner:	Stacey Lewis	
Unit Manager:	Becky Tucker	
Head office contact:	Becky Tucker	

This accident management plan contains the following information:

- Accident management site plan
- Inventory of raw materials

- Emergency procedures:

1. Immediate actions
2. Secondary actions—depending on type of accident.

Accident Management Site Plan

The Accident Management Site Plan includes information of relevance for dealing with accidents that may pose a risk of environmental pollution and also includes the location of key equipment.

This includes;

- Site drainage details.
- Mains water stop tap.
- Main electrical supply isolator.
- Location of fire extinguishers.
- Storage areas e.g. chemicals, fuel.
- Drain inlets vulnerable to contamination.
- Spill kits or emergency materials e.g. sand bags.
- Damming points e.g. culverts, boom anchor points etc.
- Potentially sensitive areas of porous or unmade ground.

Reference should be made to the site plan for Site drainage details and locations of points above, where applicable.

Recording Incidents

All incidents that have caused or could result in environmental pollution are recorded immediately following the event on the Site Incident Report

Emergency Procedures

In the event of an emergency, the following procedures shall be followed:

Immediate Actions:

- Raise alarm where human safety is at risk.
- If necessary, contact emergency services, dial 999 and ask for the relevant service.
- Extinguish all naked flames.
- Obtain help from other members of staff nearby.
- In all cases wear and use appropriate Personal Protective Equipment.

Secondary Actions:

Follow appropriate procedures for type of accident as described in the following tables.

Accident Type	Anticipated Consequences	Action to be taken (listed in order of priority)
1. Overflow or failure of: <ul style="list-style-type: none"> • Fuel, Oil tank or drum • Chemical spillage. • Spillages during loading, unloading or internal transport operations. • Failure of automatic liquid level control sensors and devices • Surface water flooding from adjacent 	Potentially polluting liquids flow over yard to interceptor and watercourse.	1. If possible, quickly stem source of liquid 2. Assess route of discharge and identify easiest method and location to prevent further discharge. 3. Key points identified: Interceptor Drains: <ul style="list-style-type: none"> • block with sandbags • cover top with drainblocks • insert interceptor bung (if safe to do so)

Accident Type	Anticipated Consequences	Action to be taken (listed in order of priority)
<p>land/nearby watercourse.</p> <ul style="list-style-type: none"> Off-site pollutants at risk of entering site. Contaminated surface water from firefighting or other emergency activity. 		<p>4. Runoff from edge of yard to be stemmed - use sandbags down gradient of arko drains to contain spillage within site hardstanding and direct any contamination into interceptor drains</p> <p>5. Contact Manager (note; this may be whilst any of the above is being carried out.</p> <p>6. Consult Product Data Sheets (COSHH) if appropriate</p> <p>7. If necessary, contact Natural Resources Wales (See Site Notice Board for contact info)</p> <p>8. If necessary, use vacuum tanker or pump to clean up spillage and interceptor containing contaminated water and dispose of safely (Haz Rem Emergency - Tel: 01495 244757 Mob: 07971 987946)</p> <p>9. Transfer to local treatment facility or place contaminated materials in another appropriate storage vessel for treatment.</p>

Accident Type	Anticipated Consequences	Action to be taken (listed in order of priority)
		<p>10. Make temporary repairs if appropriate.</p> <p>11. Clean up contaminated areas.</p> <p>12. Dispose of contaminated materials safely</p> <p>13. Assess cause and take action to prevent repeat.</p> <p>14. Record incident, measures taken and to be taken.</p>
<p>2. Fire</p> <ul style="list-style-type: none"> fuels & oils chemicals buildings 	<p>Spreading between buildings and stores.</p> <p>Toxic and polluting smoke. Wind dispersion of pollutants.</p> <p>Surface runoff from fire fighting water.</p>	<p>1. Raise alarm on site.</p> <p>2. Ensure all non-essential persons are evacuated from danger area.</p> <p>3. If you are trained and it is safe do so, fight fire as appropriate.</p> <p>4. If safe to do so, turn off electricity/fuel supplies throughout site</p> <p>5. Ensure all staff on site are alerted.</p> <p>6. Most senior person on site is responsible for calling the fire brigade</p>

Accident Type	Anticipated Consequences	Action to be taken (listed in order of priority)
		<p>and other emergency services necessary.</p> <p>7. If necessary, contact Natural Resources Wales (phone number on site noticeboard).</p> <p>8. Post member of staff at bottom of roadway to direct emergency services.</p> <p>9. Liaise and follow instructions of emergency services making them aware of risks and hazards, provide copy of Accident Management Plan and Fire Management Plan.</p> <p>10. Consult Product Data Sheets (COSHH) if appropriate.</p> <p>11. Do not enter or permit others to enter affected area unless it is safe to do so to evacuate persons</p> <p>12. Ensure fire fighting water and other liquids cannot cause pollution – follow steps as outlined above – see (1).</p> <p>13. Move at risk materials (or if deemed more appropriate burning materials to a fire segregation area (quarantine) if</p>

Accident Type	Anticipated Consequences	Action to be taken (listed in order of priority)
		<p>there is a risk of the fire spreading. Only do this if it is safe to do so using Plant and Equipment</p> <p>14. Clean up any materials that may be a hazard to the environment – where materials identified as containing asbestos are present specialist services are to be employed.</p> <p>15. Dispose of contaminated materials safely.</p> <p>16. Assess cause and take action to prevent repeat (Accident investigation process)</p> <p>Record incident, measures taken and to be taken.</p>
3. Severe weather leading to flooding and wind damage	Overflow of storage facilities, power outages, fire	<p>1. As above – see (, 2, 4, 5, 7, 8 and 11))</p> <p>2. Start emergency generator/obtain and have qualified electrician install generator</p> <p>The Site is registered with Flood Warning Direct in order to receive notice of potential flood</p>

Accident Type	Anticipated Consequences	Action to be taken (listed in order of priority)
		alerts/warnings via phone and text message.