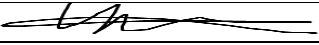


Environmental Management System

Enviroventure Waste Solutions Ltd

Report compiled by:	Gareth Danter-Hill	Environmental Focus Ltd
Customer:	Diana Jones	Enviroventure Waste Solutions Ltd
Requirement:	Environmental Management	EMS-annually reviewed
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Signature:		Gareth Hill
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Introduction

This EMS is designed to highlight and dictate the on-site processes for the company should they be used on site. It will be subjected to regular review in line with operational and legislative changes. The document has been produced in line with current best practice and in accordance with all relevant legislation.

The following documents were used as to aid the formulation of this management system and the associated documents. The standards outlined within these documents will be adhered to throughout site operations:

How to Comply, SGN5.06, H1 guidance, H4 guidance.

TCM

The site TCM has successfully upgraded her qualifications to enable her to act as the competent member of staff on site. These certificates have been provided to NRW previously. The TCM for site is fully operational and is based at the site full time. In addition to this, an external Environmental Consultant is employed to undertake monthly inspections to ensure that compliance with all permit conditions is being achieved.

Site Operations

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

Pre-acceptance Procedures

The pre-acceptance procedures adopted at site are in accordance with the Sector Guidance Note 5.06 section 2.1.1 and the relevant guidance notes where appropriate. In order to ensure that unsuitable wastes are not accepted onto site, the senior management team will be used to ensure that the materials delivered are suitable to be recovered on site. This will be done by checking that the waste being delivered firstly is coded correctly and secondly whether the EWC code is on the list of permitted wastes at site. This assessment will be visually and olfactory only. If it is deemed that the wastes are not suitable to be recovered on site as a result of these procedures; they will not be accepted and will be returned to the waste producer.

A pre-acceptance screening procedure will be used to ensure that the wastes that are being proposed for delivery comply with firstly the requirements of the environmental permit held and secondly, whether the wastes are suitable to be recovered. This process will involve a review of information from the waste producer.

All waste deposits to be utilised within the treatment process will therefore be either pre-booked for acceptance to site or inspected at the weighbridge.

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

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

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

Testing (if required) of feedstock supplies will identify the following:

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

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

Acceptance procedures

All wastes that are received at site are both visually checked when tipped off and during treatment operations.

Duty of care paperwork is checked by the operative in the reception area to ensure that the waste is compliant with the EWCs on the permit of the site.

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

Due to the nature of the waste and how it is collected, there is inevitably going to be a certain amount of contamination in the waste. However, due to the type of waste being accept this is not foreseen to be a major issue. Any cars that are collected may have some small-scale wastes (paper etc) in the seating area or the boot but this will simply be emptied and placed in the relevant bin/storage area on site.

Waste will then be stored in the appropriate area for the waste type for bulking up and onward processing. Wastes will remain on site for as short a periods of time as possible.

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

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

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A log is kept (for waste return purposes) of all waste that is accepted at site. This log is checked each month, and this ensures that the permitted tonnage will not be breached. If this figure is reached, then waste rejection procedures (detailed below) will be initiated to remain compliant on site. To ensure that the maximum storage figures (detailed below) are not exceeded, the site use knowledge and experience of stockpile sizes to estimate the total level stored. For example, when an individual bay reaches capacity at full width and length, to a height of 4m, there is approximately 200T held within it. This loads 8 articulated lorries and is totally emptied over a rolling 2-week period when this level is reached, by keeping this consistency the site knows what levels are held on site.

The approximate waste throughput for the year at the site is 1500-1800T. The maximum safe storage on site at any one time is approximately 1000T, however, realistically the site will hold just 750T. The site doesn't have any restrictions on height of stockpiles through planning but will endeavour to ensure compliance with the NRW fire guidance and maintain stockpile heights to 4m where possible.

Separation distances will be maintained to be as large as possible for the short term with the site developing an improvement programme covering the next 8-12 months. Within this timeframe A-rated fire blocks are to be installed progressively across the site and between the 3 stockpiles on site. This will be done one at a time, with maximum separation gaps being maintained throughout the stockpiles where no fire walls are installed. The aim is to have 2 fire walls installed by the end of the improvement phase to ensure maximum storage on the site but with maximum fire risk protection and compliance. As each phase is constructed, NRW will be informed with photographic logs. The improvements on site will also include extensions to the concrete surface to allow for greater separation, however, throughout this extension period, there may be a time where separation distances and stockpile heights will both reduce and get higher as the concrete 'goes off'.

Rejection procedures

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

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

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

On site treatment processes

The site is designed to store, separate and bulk up wastes accepted from a variety of sources. The primary function of the facility is to separate selected recyclable materials by a combination of manual and mechanical processes. To facilitate in the storage of these wastes further processes may be undertaken if required. However, at present this is not required as the waste is removed from site when the storage bays are full, maintaining an effective throughput of materials.

The site is split into several processing/storage areas:

- **Waste reception:** The waste received on to site is unloaded in this area for inspection and determination of processing. Within this area wastes that require manually depollution are segregated and diverted to the depollution building. The materials will be separately stored depending on waste type and kept in dedicated areas pending onward recovery elsewhere. For example, all wood will be stored away from other materials, so contamination of other wastes is reduced.
- **Waste storage:** The waste storage areas are designated zones where the storage of both mixed and segregated materials are held pending onward processing. When the stockpiles within these zones are full, they are removed from site and taken for onward recycling. Selected materials are pulled from the mixed piles and stored in dedicated skips and bays, there are limited to metals, cardboard and wood at present.
- **Depollution:** This activity is not currently being undertaken on the site. However, if the process does begin then the following parameters will be complied with. There are only 3 cars to be stored within the depollution bay at any one time. One vehicle will be processed/stored in the actual depollution bay. Up to 10 vehicles awaiting the depollution process will be stored outside in a dedicated storage area.

Mixed C&D treatment and storage

The largest proportion of waste accepted through the site is mixed construction and demolition wastes that originates from builders. Once checked and accepted on site the materials are separated via manual and/or mechanical means to either be stored within a separate bay as wood or as ferrous/non-ferrous metals. The remaining material is bulked up temporarily before being removed from site pending further treatment elsewhere.

The loads will be sent out in their loose form in articulated lorry or by using smaller roro hook loaders. Where possible, the materials will be sent locally to try and ensure effective transport and reduce environmental impacts.

ELV depollution process-not currently operational

As a minimum the following technical requirements will be followed to maintain good practice when depolluting ELVs:

1. Treatment operations for depollution of end-of-life vehicles:
 - removal of batteries and liquefied gas tanks,
 - removal or neutralisation of potential explosive components, (e.g. air bags),
 - removal and separate collection and storage of fuel, motor oil, transmission oil, gearbox oil, hydraulic oil, cooling liquids, antifreeze, brake fluids, air-conditioning system fluids and any other fluid contained in the end-of-life vehicle, unless they are necessary for the re-use of the parts concerned,
 - removal, as far as feasible, of all components identified as containing mercury.
2. Treatment operations in order to promote recycling:
 - removal of catalysts,
 - removal of metal components containing copper, aluminium and magnesium if these metals are not segregated in the shredding process,
 - removal of tyres, glass and large plastic components (bumpers, dashboard, fluid containers, etc.), if these materials are not segregated in the shredding process in such a way that they can be effectively recycled as materials.

The suggested depollution process on site to be done when vehicle is grounded:

- *Remove battery;
- *Remove fuel filler cap and oil filler cap;
- *Set heater to maximum;
- *Remove wheels and tyres and separate balance weights;
- *Remove any parts identified as containing mercury;

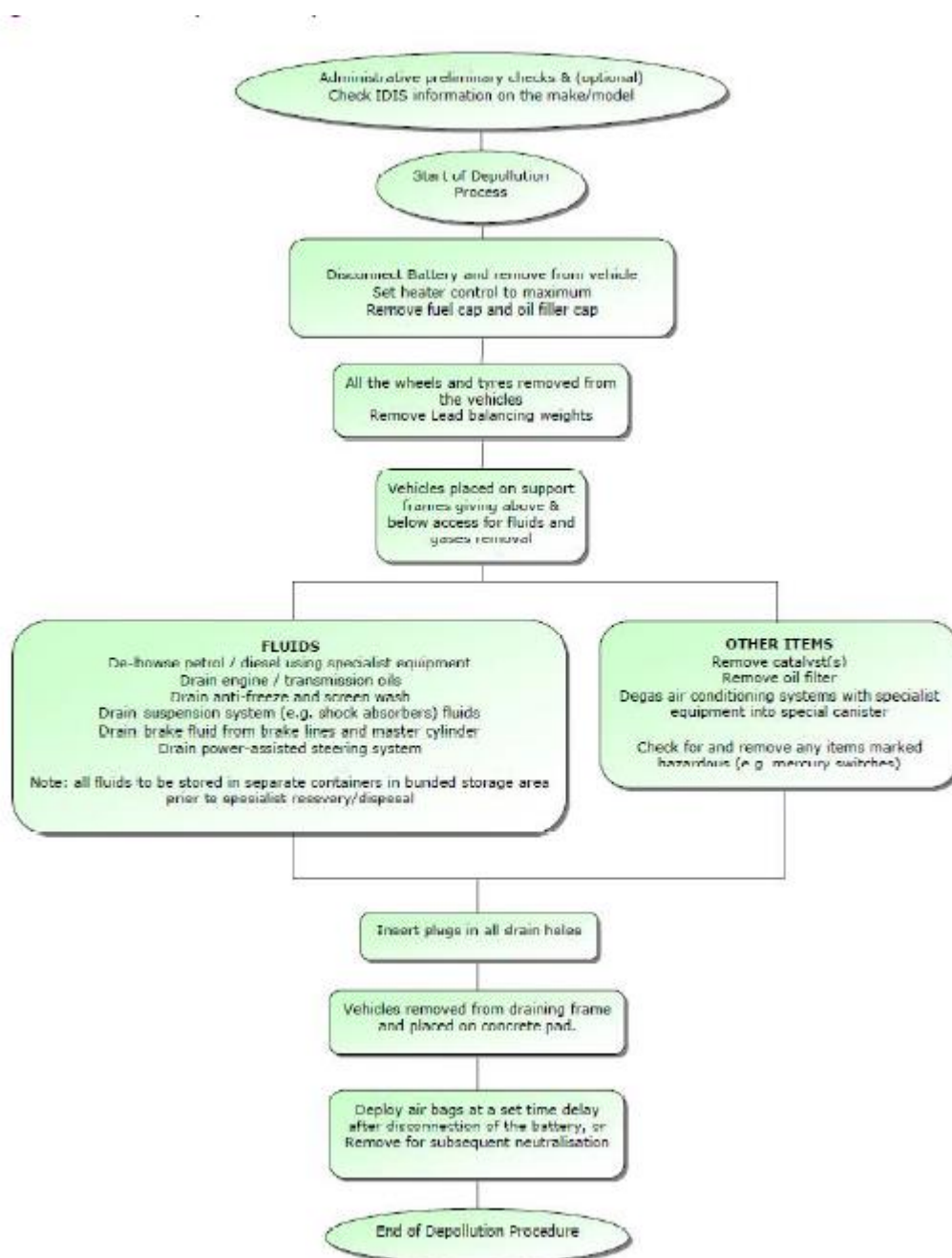
Then, once vehicle is suspended in depollution frame or lifting device:

- *Drain engine oil and remove oil filter for crushing or disposal;
- *Drain transmission oil, including rear differential if applicable;
- *De-gas air conditioning unit (if fitted) \;
- *Drain coolant;
- *Drain brake fluid;
- *Remove catalyst (if fitted);
- *Drain washer bottle;
- *Drain brake/clutch reservoir(s);
- *Drain power steering reservoir (if fitted);
- *Drain fuel tank;
- *Drain shock absorbers or remove suspension fluid;

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- *Replace drain plugs/fit plastic stoppers;
- *Remove vehicle from depollution frame or lifting device;
- *Deploy airbags and other pyrotechnics in-situ (if fitted and able to conduct this operation);
- *Remove air bags and other pyrotechnics (if fitted and cannot be deployed in-situ).

ELV Process Flow



Permitted wastes

The site shall only accept the wastes identified within the relevant tables within the permit held.

Staff Training

The site manager is responsible for ensuring that all staff working at the site are competent in the duties required of them. An induction training programme will be carried out if required and signed by each member of staff, this is also the case for ongoing training sessions and toolbox talks etc.

Site Infrastructure and drainage

The site building is served by a sealed drainage system. The building is sealed and so any liquids that are created through spillage etc will not flow outside of the immediate area. The perimeter of the building is sealed by a concrete bund. All liquids will be contained within the building and site boundary.

All clean water such as rainwater from roof tops etc are diverted away from the waste storage areas where possible.

Road vehicles will use the access road and the front area of the site only, therefore the creation of mud and debris, is anticipated to be minimal. If this does however become an issue, wheel-washing facilities can be made available on site as part of the maintenance area.

Every effort will be made to control any leaks and spillages from occurring in the first instance. However, it is recognised that liquid wastes from spillages and plant failure can occur. Every incident of this type will be classed and treated as an emergency on site. Spill kits will be held within the site and used as and when required. The now contaminated materials used, will be cleaned up and held in isolation until they are consigned off site to an appropriate facility.

Any spillages or leakage will be reported to NRW, along with the on-site spillage remediation paperwork following the appropriate procedures below.

The waste storage area is fully concreted and bordered by a wall/kerb area to ensure that waste doesn't get off the concrete pad. Netting is also to be re-constructed when possible, following a recent fire on site. A sealed sump has been constructed within the concrete ensuring that all liquids that are created within this area are collected effectively and can be removed from site when required by using a fully licensed and appropriate contractor.

The drainage sump is visually checked for integrity as far as possible each time it is emptied, it is also checked annually by a competent contractor to ensure that no cracks etc have developed.

Please refer to the attached site plan for the general layout of the site and storage areas.

Emissions

Due to the effective processing of waste and quick turnaround of removal from site, emissions of any type are not anticipated to be an issue. However, if pests are noticed to increase, measures

will be initiated to control the issue. This may be a review of incoming material or the employment of pest control specialists.

Litter will be managed on site daily via visual checks. Due to the waste types being tipped and sorted within the site and the netting installed around the storage area, wind-blown wastes are not thought to be an issue. However, if waste is noticed within the surrounding yard area, an operative will be tasked to pick all litter created and ensure it is stored appropriately. When the storage areas are full and are being stored pending removal from site, if litter is being created, they will be stored under a netting (or similar) to ensure that wind-blown material is reduced.

Spillage procedure

All staff are to wear the required PPE to ensure work is carried out safely.

- Identify the source of the spill
- Communicate the source of the spill to required staff
- Deploy spill kit asap
- Isolate the drains if possible
- Once the spill has been cleared, ensure correct disposal of spill kit materials
- Record/log spill in site diary
- Inform NRW and DCWW (if appropriate)
- Initiate a re-stock spill kit
- Undertake an incident review/investigation

Once an internal review has been undertaken, all relevant staff will be informed of the findings and training logs will be updated if required. As a minimum, the review will cover the cause, actions taken, resources used, missed opportunities and prevention measure effectiveness.

Site security and maintenance

As part of the daily site activities, the security fencing/wall panels and general site infrastructure will be checked for integrity. The site is concreted (used for storage and waste reception) and the area of the site that is laid to hardstanding, is located towards the front of the site where only inert materials on a small scale are held as well as skip storage.

If any defects are noted, they will be logged with the company director and senior management immediately and a programme of works will be initiated if the defects are found to be major and in need of urgent repair.

Emergency contact details will be available on the site identification board should they be needed after hours.

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Site Condition

The site has continued to ensure that the Environment is protected and that site operations, across the life of the permit, do not negatively impact upon the wider environment. The progressive improvement of infrastructure such as the concrete area where the waste is stored and treated, the sealed drainage sump and the netting surrounding the waste, all ensure that any contamination that could be created by the waste is controlled and contained.

The site has had one major incident (2022) when a fire spread throughout the waste material. Though the fire caused smoke to pollute the air, run-off from the fire water was contained to the concrete and drainage sump by effectively bunding and emptying the sump throughout and after the incident. It is important to note that the fire was not started at Enviroventure Waste Solutions but within a neighbouring waste site.

Complaints

There is a form dedicated in the Annex list to be completed by the competent person or director when reviewing the grounds for a complaint. The response time is 5 working days to all complaints unless otherwise requested by the operator. The operator notes that in the event of there being significant pollution it will advise NRW of the occurrence and any actions taken.

Records of any complaints investigated will be maintained at site for 3 years.

System Procedures

Environmental Policy

Scope- To outline the company commitments and details the proactive framework for continuous improvement. The policy sets out the company aims and environmental working methods for external stakeholders.

Procedure-

- The design, maintenance and implementation of the Environmental Policy is the responsibility of the company director.
- To be updated annually with director sign off.
- A copy of the Policy must be printed and kept in reception/site office.
- The Policy must contain commitments to improvement and compliance.
- The Policy should also be made available to the public if required.

Responsible person- Company director

Environmental Review

Scope- The review acts as an audit to ensure the company is compliant with relevant legislation. It relates to performance that are linked to environmental issues.

Procedure-

- The review itself must be subject to an audit to ensure that it is fit for purpose.

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- Must be updated annually or if/when site procedures change significantly from normal operations.
- Each section must be reviewed and maintained as still relevant to operations. If not, modifications must be made to both practices on site and review methodology.
- If modifications are required, they should be highlighted in the original text so the reader can find the alteration.
- The review recommendations should act as the basis for the improvement plan.

Responsible person- Environmental Representative

Improvement Plan

Scope- Defines the methodology for highlighting and then implementing the environmental improvement plan for the site.

Procedure-

- To set a realistic programme of improvement that will run alongside a clear guide on how to achieve the improvements required.
- The plan shall be informed by the environmental review as well as any external audits (such as NRW inspections).
- The plan is to be kept up to date and maintained throughout the year and as actions are completed.
- A plan is to be produced on an annual basis; the term doesn't have to run January to December.
- The plan must be made available to all staff and stakeholders if required.
- If a review highlights a non-compliance, this will be acted upon and recorded immediately.
- All improvements are to be reviewed annually. If some have not been acted upon, then they can be rolled over but with full justification.

Responsible person- All relevant staff for actions

Environmental records

Scope- To ascertain what data and information needs to be logged and kept.

Procedure-

- It is the responsibility of the company director to ensure that all records are accurately kept.
- All incoming and outgoing materials must be logged to ensure accurate reporting.
- WTN should be kept for a minimum of 2 years
- HWCN must be kept for a minimum of 5 years

Declaration of Roles, Responsibilities and Resources

The company director with assistance from key site management and an external Environmental consultant will have the overall responsibility for Environmental issues for the site. The responsibilities will include, but will not be limited to:

- Implement, maintain and review the Environmental Management System (EMS).
- Update and comply with the published Environmental Policy.
- Monitor site inputs and outputs.
- Achieve and review all site targets.
- Ensure staff are made aware and appropriately trained in their roles and responsibilities as well as any new directives etc

Senior management will ensure that all appropriate resources are made available and that adequate time is permitted for all staff to undertake their role correctly.

Annex List

A--External Complaint Form

Date and time of complaint:	Complaint reference number:
Name of complainant (if available):	
Contact details of complainant (address and phone number):	
Date and time of incident (if different):	
Detected location of complaint/emission (NGR if available):	
Weather conditions:	
Wind direction and speed:	
Complainant description of issue:	
Other comments/observations from complainant:	
Receptor Sensitivity: (Low, medium or high)	
Previous complainant (Y/N):	
Mitigation Report reference number:	
Form completed by (sign and date):	

Impact rating	Description
0	No impact (unsubstantiated report)
1	Very slight impact
2	Slight impact
3	Distinct impact
4	Strong impact
5	Very strong impact
6	Extremely strong impact
Receptor Sensitivity: Low (footpath, road) Medium (ind./com. premises), High (Residential)	

B—Mitigation Report

Report Completed by:	
Date and Time:	

Responsible member of management:	
Report Reference:	
External Complaint Reference Number:	
Confirmed Source of complaint:	
Suspected Source:	
Weather Conditions:	
Wind Speed and Direction:	
Further Action Required on Site?	
Corrective Actions Undertaken:	
Issue Eliminated at Site:	
Impact Eliminated at Detection Location:	

Complainant Contacted by:	
Date and Time:	
Incident Closed by:	
Date and Time:	

Site Information

SITE DETAILS		
Unit phone no: 01646 697796		Mobile contact: 07974 818891
EMERGENCY CONTACT DETAILS		
Emergency services: 999		
Local Police: 999		
Natural Resource Wales: 0300 065 3000		
COMPANY CONTACTS (Out of hours)		
Owner:		Diana Jones (number as above)
Site Supervisor:		Philip Harris 07392247244
Environmental Consultant:		Gareth Hill 07494310727

This accident management plan contains the following information and steps within that are detailed in the relevant table sections below:

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

Recording Incidents

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

If deemed necessary and in the event of a major accident or incident on site, NRW will be contacted through the Regulatory Officer, or the incident hotline detailed above.

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: - 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 land/nearby watercourse. - Off-site pollutants at risk of entering site. - Contaminated surface water from firefighting or other emergency activity.	Potentially polluting liquids flow over yard to interceptor and off site.	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: - block with sandbags - cover top with drainblocks - insert interceptor bung (if safe to do so) 4. Runoff from edge of yard to be stemmed - use sandbags down gradient of drains to contain spillage within site hardstanding and direct any contamination into interceptor drains where possible. 5. Contact Manager (note; this may be whilst any of the above is being carried out. 6. Consult Product Data Sheets (COSHH) if appropriate. 7. If necessary, contact Natural Resources Wales. 8. If necessary, use vacuum tanker or pump to clean up spillage and

Accident Type	Anticipated Consequences	Action to be taken (listed in order of priority)
		interceptor containing contaminated water and dispose of safely. 9. Transfer to local treatment facility or place contaminated materials in another appropriate storage vessel for treatment. 10. Make temporary repairs if appropriate. 11. Clean up contaminated areas. 12. Dispose of contaminated materials safely 13. Assess cause and take action to prevent repeat. 14. Record incident, measures taken and to be taken.
2. Fire • fuels & oils • chemicals • buildings	Spreading between buildings and stores. Toxic and polluting smoke. Wind dispersion of pollutants. Surface runoff from fire fighting water.	1. Raise alarm on site. 2. Ensure all non-essential persons are evacuated from danger area. 3. If you are trained and it is safe do so, fight fire as appropriate. 4. If safe to do so, turn off electricity/fuel supplies throughout site 5. Ensure all staff on site are alerted. 6. Most senior person on site is responsible for calling the fire brigade and other emergency services necessary. 7. If necessary, contact Natural Resources Wales.

Accident Type	Anticipated Consequences	Action to be taken (listed in order of priority)
		8. Post member of staff at bottom of roadway to direct emergency services. 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. 10. Consult Product Data Sheets (COSHH) if appropriate. 11. Do not enter or permit others to enter affected area unless it is safe to do so to evacuate persons. 12. Ensure fire fighting water and other liquids cannot cause pollution. 13. Move at risk materials (or if deemed more appropriate burning materials to a fire segregation area (quarantine) if there is a risk of the fire spreading.) Only do this if it is safe to do so using Plant and Equipment. 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. 15. Dispose of contaminated materials safely. 16. Assess cause and take action to prevent repeat (Accident investigation process). 17. Record incident, measures taken and to be taken.

Accident Type	Anticipated Consequences	Action to be taken (listed in order of priority)
3. Severe weather leading to flooding and wind damage	Overflow of storage facilities, power outages, fire	1. As above to raise alarm if required. 2. Start emergency generator/obtain and have qualified electrician install if required. 3. Contact tanker company if required to pump out standing water that has overwhelmed the interceptor chamber. 4. Initiate repair for wind damage as soon as possible. 5. Contact NRW if required.

Receptor Communication

The site is located on a well established industrial estate where the businesses are in close contact with each other (internal roadways are privately owned by all companies, regular meetings are held). If there were to be a major incident of any type on site, all the local businesses can be quickly and easily contacted by phone or text message informing them and providing them with advice and guidance from the FRS/NRW. Beyond the local estate, local media will be used to inform the residents etc of the incident.

Site Plan- Enviroventure Waste Solutions Ltd

