Recover Blaenavon Ltd

Environmental Focus
Achieving compliance & quality

Environmental Management System (EMS)

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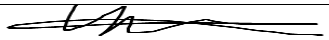
Customer:	Jonathan Pallas	Recover Blaenavon Ltd
Requirement:	EMS compilation	
Date of Submission:	October 2022	EMS-new permit
Signature:		Gareth Danter-Hill
Version number and date:	First Version	October 2022
	Second version	February 2023
	V3	May 2023
	V4-schedule 5 revision	August 2023
	Review required	November 2024

All work that is carried out as part of this agreement is on an advisory basis only. No liability will be taken by Environmental Focus Ltd for any works undertaken by the client as the service is based on recommendations and advice only.

Contents

Introduction

This EMS produced for site is designed to enable the permit and the activities undertaken within the parameters of it; to be compliant with all relevant Environmental legislation. The site is operating in accordance with Best Available Techniques (BAT) and this ensures that the risk of normal operations on environment and human health is reduced significantly. Site operating procedures are detailed below and throughout the application documents.

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

How to Comply, SGN5.06 and H1 guidance (used for assessing risk of all site activities).

Environmental Policy

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

All normal business operations are done with clear regard to environmental issues; where possible, the impact of operations at site are undertaken to minimise all impacts on the environment. Consequently, the company is committed, through a process of continual improvement that will aim to prevent pollution and minimise the environmental impact of all operations while improving performance.

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

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

The company will ensure that this policy and its objectives are understood, implemented, and maintained. This will be to achieve continuous improvement and lead to the progressive development of this Environmental Management System. A copy of the permit and all associated documentation, including this EMS will be stored in a dedicated file in the site office should they be requested by any member of staff or relevant interested party.

TCM

The TCM for this permit will initially be an external environmental consultant, Gareth Danter-Hill of Environmental Focus Ltd. He has successfully completed the course for WAMITAB Level 4 High Risk Operator Competence for Non-Hazardous and Hazardous Transfer and Treatment (HROC6). Continuing Competence certificated have been achieved for both hazardous and non-hazardous transfer and treatment of waste. Once an in house TCM is qualified, Environmental Focus Ltd will continue an advisory basis only undertaking monthly inspections of the site and the activities with the new TCM holder certificates being sent to NRW area officers.

Site Plans

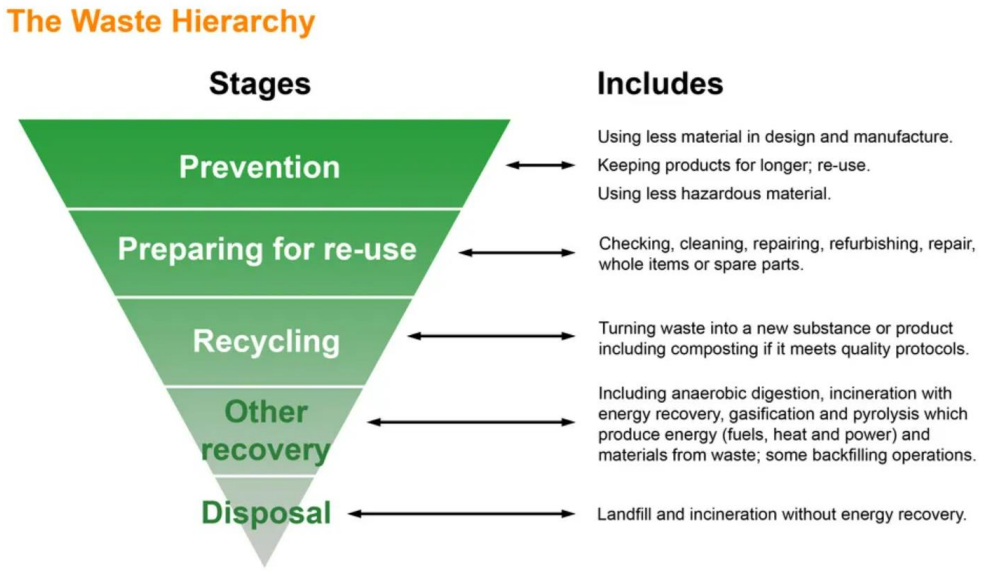
The extent and layout of the permitted operations are as shown within the plan (below) as submitted with the application. If the activities on site vary or alter significantly from those identified within the drawing, a review will be undertaken, and an updated site plan will be created.

IED implications

Due to the nature of the waste currently being applied for, the processing capability of the plant and the treatment processes to occur; it is not foreseen that the IED is a relevant consideration. Should this change in the future due to amendments to the Legislation etc., Recover Blaenavon Ltd will address the requirements at this stage proactively. The operator has spoken to an ex-permitting officer through the Producer Responsibility Team who has advised that a Bespoke Waste permit is required at this stage, this correspondence has initiated this permit application.

Waste Hierarchy

The way in which the site operates is in accordance with the requirements of the waste hierarchy. The site is a recycling site where plastics are accepted and turned back into a viable product (granulate) and sold on the open market. Any materials that are either manually picked or separated by magnet are sent to another permitted facility for onward recovery per type. No material is sent to landfill that originates from the facility. Any material that isn't suitable for the process on site (plastic of a different grade etc), will be sent to a waste transfer station for them to process with waste types that are similar in composition.



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. All waste suppliers must declare that the waste complies with the requirements of REACH (attached). The impacts of all site operations and potential pollution from the activities on air, water, land and neighbouring sites is detailed in the attached risk assessment (CAP_Environmental_RA_final_v2_Feb 23).

Pre-acceptance Procedures

The pre-acceptance procedures adopted at the site are in accordance with the Sector Guidance Note 5.06 section 2.1.1 where appropriate. To ensure that unsuitable wastes are not accepted onto site, the senior management team will be used to ensure that the materials to be delivered are suitable to be recovered on site. This will be done by checking that the waste to be delivered firstly is coded correctly and secondly whether the EWC code is on the list of permitted wastes at site. The site management will also determine whether the waste is likely to be contaminated. This assessment is fundamental to the site process as the material must be both pre-segregated and low in physical contamination to allow for the onsite process to be more efficient. If it is deemed that the wastes are not suitable to be recovered on site; they will not be accepted.

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

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

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

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

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

It is not anticipated that wastes from companies outside of the control of regular contracts are to be accepted.

Testing of feedstock supplies will identify the following when required:

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

Wastes should not be accepted at the facility without a clear method or defined treatment and disposal/recovery route with a full costing. Due to the way in which the business is to operate, all material delivered to the site is pre-agreed. This is to ensure that the plant operates to capacity and that the product materials are consistent across plastic types as per the requirements of the outlet production plant. Therefore, all material brought to site has a predestined route for end of waste and production once more.

Acceptance procedures and Duty of Care

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

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

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

Due to the nature of the waste and how it is collected, there is inevitably going to be a certain amount of contamination in the waste. For example, some plastic film may have the wrong type of film within it. To remove these contraries a picking operative has been employed on site and the material will be processed to remove all contaminants before being batched for onward processing. This is a fundamental check point to the process.

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

- Description of waste

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- EWC code
- Date and time of delivery
- Weight of load
- Waste carrier registration number
- Customer name and address

A monthly and quarterly log is kept (for waste return and PRN purposes) of all waste that is accepted at site, per customer and type. This log is checked each month, ensuring 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.

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

These records will be kept in the site offices in dedicated files so that inspection of loads can be simply carried out. All Duty of Care (i.e waste transfer notes) paperwork will be held in paper and electronic form (where possible) for the legally required timeframe.

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

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

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

Rejection procedures

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

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

- The waste will be separated from any other wastes currently on site and will be stored on an impermeable surface that benefits from sealed drainage (if deposited).

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- 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 Regulatory officers will be informed of the non-compliant load and sent a copy of the on-site log of the activity that will detail the origin and carrier of the load.

Quarantine procedures

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

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

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

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

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

Storage parameters

The site will operate its storage, treatment and throughput of waste materials in accordance with the table set out in the FPMP, also detailed below.

Incoming waste type	**Max/day tonnage (approx)**	**How managed**	**Form in**	**Storage total tonnage (pre/post treatment)**	**Length of storage (pre/post treatment)**	**How stored (pre/post treatment)**	**Max. Stockpile size (L x W x H) (m) and volume (m3)**
Plastic Packaging-in bays	100	Bulk up only pre-process	Baled	1584/n/a	(21 days/ n/a)	(Baled/ton bags to deliver off site)	4 x 4 x 3 48
Contaminated fractions of plastic waste	*<1*	*Separated to remove*	*In bin*	*No treatment, remove*	*(1 week post picking)*	*Loose in bin*	*Wheelie bin x3*

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The very nature of the on-site activities results in a potential impact to air, water, groundwater, local environmental receptors, special designations, local population and business. However, when operated in accordance with this EMS, the submitted FPMP and the measures set out within the ERA, this risk can be controlled and minimised as far as possible. There is always the potential for unforeseen circumstances and accidents on site that could result in off-site pollution events, however, these can to an extent be controlled if/when the occur by implementing the processes detailed within the documents submitted as mitigation and control.

The storage times are easily monitored through the management of the input of materials. Each bay is filled with plastic from individual customers. For reporting purposes (PRN), each customer must have the exact tonnage of material that has been processed at the site for them. This works in a way that when a customer has filled one bay with plastic, this gets attributed a day of processing that is logged in the working diary for the plant on site. This means that on a given day, the entire contents of the bay will be fed through the plant to allow for accurate reporting to each customer. This process happens at a maximum time of every 21 days (sooner if possible). Due to the high processing capacity of the plant (52t/day), each bay can reliably be emptied during each working day as typically a bay will hold 26.40T.

The total storage capacity for the site when fully operational is 1,584T at any one time (over 60 bays). This is split as 422T in the operational area to the front of the building and 1,162T in the storage area to the rear of the building. However, the site only intends on holding approximately 1,000T at any one time, the extra bays, when built, will allow some additional bays to be used for storage if required during plant maintenance /breakdown etc. Conversion factors are based on each bale being approximately 550kg/bale.

Permitted Wastes

The following waste types are applied for to be permitted for acceptance on site. The throughput per year is to be limited at 20,000T; the site shall not accept any liquid waste, any hazardous wastes or wastes that mainly consist of dusts, powders, loose fibres and those that are likely to give rise to odour:

EWC Code	Description
15	**WASTE PACKAGING, ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED**
15 01	packaging (including separately collected municipal packaging waste)
15 01 02	plastic packaging
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 39	plastics

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Operational Procedures

Plastic wastes

The plastic wastes are brought to site from selected customers only, the site is not open for public/trade drop off. Each contract has been specifically gained due to the waste type produced and received. The plastic waste is accepted as film material and packaging only. All material is pre-treated on the site of production to ensure the highest quality of plastic received, the material is baled prior to acceptance and is selected due the lack of physical contaminants within the bales.

The baled waste will be delivered and unloaded in designated holding areas pending the feed into the plant. The holding area is fully concreted and benefits from a sealed drainage system that is served by the combined sewer network. The site will hold a maximum of 1,000T at any one time, this is enough feed supply to ensure that the plant operates at full capacity for a 3-week time frame allowing for shut down periods for plant maintenance etc.

The plant on site is used to treat approximately 1,500 tonnes of material per month to provide a range of granulated products suitable for re-sale after manufacture. Stockpiling of waste materials will not be done for prolonged periods of time as these materials are readily required for use within the plant at a high turnaround rate.

The process to obtain the manufactured product follows a set of fixed procedures and operations.

The waste is firstly taken into the building where the treatment plant is located (shown on the site plan) one bale at a time. It is placed on a receiving platform ahead of the first conveyor where several operatives manually spilt the bale and check for any items of waste/contamination that shouldn't be there. If found, the items are removed and placed in wheelie bins to be collected and removed from the site each week. The plastic from the bales is now loaded onto the first conveyor of the treatment plant. This section of the plant is custom fitted with both a noise and dust insulation tunnel reducing the likelihood of off-site nuisance. The plastic is then fed into the shredding section of the plant, where the material is reduced in size before being fed across a second conveyer. Several bales will be loaded into the building at the end of the day shift to allow continuous operation throughout the night, this will prevent the doors being opened overnight.

The second conveyer moves the shredding material to a built-in dual magnet and alarm system. The magnet system is designed to remove all metal from the feedstock if found. The alarm system (visual and acoustic) is programmed to stop the feed if the metal detected could not be removed by the magnet system. The metal would then be manually removed before the process is started once more and on to the heat treatment stage.

At the heat treatment stage, the shredded plastic material is spun and heated to a temperature of approximately 200°C. It is then fed via a Corkscrew auger through an internal laser-filter that identifies and removes contamination on a continuous high-performance filtration system for the separation of "soft" contaminants such as paper, wood, aluminium, copper, foreign polymers, etc. from contaminated plastic melt. A scraper disc and scraper ensure high efficiency due to the internal geometry and the directly connected discharge channels. Contaminants are lifted from the screen immediately and forwarded to the coaxial discharge screw. The contaminants are removed under control and with a minimum of melt via this optimised discharge system. The scraper and discharge screw speeds are controlled fully automatically and ensures fast removal of contaminants through a self-cleaning filter system with rotating scraper for screen cleaning (4 screens and 12 scrapers).

The melt on material continues through the machine to a die head that cuts and quickly cools the plastic in water. The Pellet then is shaken dry and blown to a bagging location where the weight is recorded. All water within the process is fed by mains water internally, water is recirculated within a closed loop and is cooled via the heat exchanger immediately behind the pellet water bath. The final product is removed from the facility and used to create new plastic products at a sister site owned by the company.

All plant that is to be used on site for the treatment of the plastic waste is specifically designed for this process. All abatement measures for moisture control, dust and noise are internally fitted to aid with the efficiency of the plant. The exhaust system for dust/particulate and moisture removal is undertaken within the process stages and all captured emissions are physically held within the filter bag at the end drying phase. This bag, when filled, is removed from site, and taken to an appropriately licensed facility.

The system does have a flue for escape of heat from the plant, this is a separate system to the exhaust outlet and does not emit anything other than latent heat from the process to reduce the condensation levels within the factory itself.

Contaminants in material

Small levels of contamination such as metal, paper, different plastic grades and general wastes be produced from the bales received. This is not classed as an input waste but could still be brought to the site as contamination within the permitted waste types. This waste will be removed from the plastic at various stages of the process and stored separately. This material is removed from site frequently and doesn't get kept for periods longer than 1 week due to space constraints within the site building. As the site is currently operational, the amounts of this type of waste can be accurately forecast to be applicable throughout permitted operations. It is not anticipated that more then 2 wheelie bins of contamination will be received in a 7-day period and will be stored pending collection and onward processing.

Planned Preventative Maintenance

All maintenance on site is carried out by qualified technicians/engineers in accordance with the PPM plan and manufacturers recommended service schedules. The qualified engineers are employed from a variety of sources as appropriate to the specific task. Such engineers may be provided by original equipment manufacturers, equipment lease companies, specialist contractors or in-house fitters.

For the full list of PPM schedules, please refer to the annex list below.

Monitoring and Emissions Regime

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

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- Waste reception
- Waste movement on site
- Loading the plant

Due to the waste types accepted and the limited processes done outside of the sealed units, mitigation measures and corrective actions to eliminate and to prevent emissions are not required beyond general good practice. The procedures are summarised in the management system below.

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

- Water discharges
- Dust and litter
- Noise and vibration

There will be no point source emission of any substance directly associated with any activity other than latent heat as the internal filtration system will be the main element of extraction through the exhaust.

Water Discharge

There is no outlet for any surface waters to flow from the site. The site has areas of made ground, but they are separated by kerbing. The areas of made ground are grassed verges and are sloped in nature, for decorative purposes only. Beyond this, the entire external area of the site is concreted. The buildings themselves cover a significant proportion of the permitted area where no water is discharged from within, the rainwater from the roof coverage gets collected in a water storage tank before overflowing to the foul/combined network that serves the site.

Monitoring will continue in line with permit requirements.

Dust and litter

Due to the type of waste and the measures of treatment adopted on site, dust is not anticipated to be an issue on site at all. The plastic material itself is typically classed as a low dust emitting material and is delivered to site pre-sorted and baled in its largest form stacked to a maximum of 3m.

Emissions may arise in the form of dust from the activities of vehicle movements when arriving and leaving site. This is again very unlikely as the vehicles are using public highways and are not tracking over any made or unmade ground. The site itself is fully concreted and so no dust is created on site haul roads, therefore the creation of dust risk through vehicle movements caused by the site are minimal to non-existent.

The shredding of plastic internally is the only area of the operation where dust creation is the most likely. However, due to the measures adopted throughout the process including internal suppression within the plant, dust is not anticipated to be created at level likely to cause a nuisance. The shredding and suppression unit is fully sealed.

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Daily checks for dust will be carried out as part of the maintenance/inspection checklist annexed to this report.

The initiation of any dust suppression techniques including water mists and sprays could be adopted on site, in particular the damping down frequently during in dry weather. Each item of plant used for the treatment of plastic is internal and has its own integrated capture technology, therefore is extremely unlikely to produce dusts that can leave the permit boundary or the building itself.

Water suppression can also be used in the form of sprays from an on-site hose reel when the material is being unloaded if required throughout drier spells of weather. However, as mentioned above, this isn't anticipated to be required due to the waste types, surfacing and form of delivery.

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

Litter

Litter is not likely to be an issue on site as the plastic is accepted pre-baled. The bales are tightly wrapped and bound so the risk of material escaping the bale is minimal. All breaking of the bales is undertaking internally with 3-4 operative in the location to pick up any items that fall to the floor preventing them from escaping the immediate area. Litter will be monitored and cleaned up as per the requirement of the checklist annexed to this report. A site operative will monitor any wind-blown materials on site daily and pick them as they are noticed. Any material that has left the site boundary will be picked and collected daily to ensure that any waste that has blown off site does not remain an issue. If this does become a regular problem across the site, then Recover Blaenavon Ltd will consider installing netting to catch any litter being blown before it leaves the site. However, due to the nature of the wastes to be accepted, litter, to this extent, is not foreseen to be an issue.

Noise and Vibration

Recover Blaenavon Ltd have had a Noise Impact Assessment undertaken prior to permit application. The results of which can be seen in the attached report (22-475 Capital Valley Plastics & Recycling).

The surrounding area is largely industrial as the site sits within an established and historic industrial setting. There are, however, several residential properties within proximity to the facility and so a Noise Impact Assessment has been undertaken to ascertain whether operational noise is likely to impact upon them.

The operations using fixed plant are those which will generate the greatest level of noise. The plant is located inside a building that benefits from roller shutter door; the building is located centrally to the permit boundary.

To help reduce and minimise the escape of noise outside of the site boundaries, the equipment will be maintained and used in accordance with manufacturer recommendations.

The site has been planned to ensure the best practicable means would be always employed on site to ensure that all plant and equipment does not produce excessive beyond what is currently being produced beyond the site boundary. For example, drivers visiting the site will be encouraged not to

leave plant idle, the forklift truck will be turned off when not in use etc and speed limits will be used to reduce the revving of engines on site. An additional NIA has been conducted as several noise reduction measures have been implemented on site since the last monitoring round.

Recommendations such as ensuring all doors remained closed have been initiated as well as a full review of the extractive system. The review found that the plant was operating an 'all on or all off' system by the previous owners and this was not required. Three of the four areas where the extractive system was being used, didn't require it to be operational, these have now been shut off in isolation and have reduced the noise level being created. Additionally, an encasing housing has been built around the chiller externally, where it was noted, noise was being created. The results of these improvements can be seen in the attached NIA document.

The facility has been in operation for many years, without receiving noise complaints to both Regulating authorities and directly, and they have been moved in recent years further from the affected receptor, which has apparently become habituated to the wider industrial soundscape of the area. The noise assessment indicates that when operated in the manner described in the report, the Site can be brought forward in compliance with the requirements of the Noise and Vibration Management: Environmental Permits, demonstrating BAT where possible, as outlined in Section 5 of the NIA.

If, however, noise becomes a wider issue through complaints received directly to the site, detailed monitoring will be undertaken (points identified in the attached NMP) to ascertain the severity of the issue and an improvement plan will be initiated to reduce the noise emissions if required (replace the diesel forklift with an electric model etc). A noise monitoring programme will be created to align with the severity of the issue depending on the outcome of the monitoring. A new NIA will be undertaken by a suitably qualified professional and if any actions are required within the assessment to reduce noise levels, these will be actioned. It is not anticipated that major changes can be made however, the site currently operates in accordance with BAT.

Due to the nature of the plant and the activity on site, vibration is not thought to be a likely cause of nuisance to local receptors.

Noise Monitoring Protocol

The first stage of the procedure would be to validate any complaint received through physical monitoring in the locations seen in the attached NMP. Once substantiated if the levels of noise are significant or persistent then a new NIA would be completed by a specialist contractor. If the report highlights an increased issue, then the site will implement whatever actions detailed within the report to ensure that noise levels are reduced to within acceptable levels (if any as the site are currently operating in accordance with BAT).

The noise monitoring will continue to be undertaken until all recommended actions have been completed. The monitoring rounds will be done every 3rd hour, throughout the operational period of the plant. If noise is noted at the monitoring locations it will be recorded in the site diary as well as the approximate wind speed and direction.

Depending on the nature of the complaint, it may be possible for the company to remedy the cause of the complaint without the need for a second NIA. For example, if the nature of the complaint was

related to reversing beepers, then the company would install 'white noise' reversing alarms to replace the beeping type to reduce noise levels.

Other monitoring parameters

Control of pests

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

Control of mud and debris

The surfacing of the operational areas of the site being concrete, decreases the risk of mud flow during wet weather. The lack of 'dirty' waste types on site and the storage of waste within the bays significantly reduces the risk of mud/debris on the approach roads or public highway. The deposit of any material on the public highway will be treated as an emergency and will be cleaned with a mechanical vacuum sweeper asap. No wheel cleaning facilities are proposed at the site. The waste types handled on site and the fact that site access road is surfaced with concrete reduces the likelihood of mud or debris being carried onto the highway.

Permitted Operations

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

Table 2.1 Activities

Description of activities
R13: Storage of wastes pending the operations numbered R3 and R5
R3: Recycling or reclamation of organic substances which are not used as solvents;
R5: recycling or reclamation of other inorganic materials

Site Engineering

Externally the site is to be made up of both concrete and soft grassed surfaces. The grassed areas are only landscaping areas and are not to be used in connection with any waste or processing activities. The storage bays for waste and quarantined materials are to be constructed on a concrete surface that are enclosed on 3 sides by concrete 'lego' block type walls. This is to ensure that the materials

are segregated from other wastes and materials to prevent any unauthorised blending and cross contamination of the material. The quarantined material will be stored in a sealed skip within the quarantine area (shown on the FPMP site plan) and so runoff will be eliminated.

The buildings on site to be used for non-waste material storage and waste processing are constructed using brick and concrete block with steel clad roofing materials. There is no internal drainage system linked to the processing area internally. Only a foul line serves the buildings for the use of toilets and canteen purposes.

A structured maintenance schedule of the site infrastructure is operational allowing for the periodic improvement and re-construction of the concrete/building if required overtime. The storage bays can be temporarily relocated when the work is being undertaken to an area of concrete not currently used for waste storage but is served by the same foul/combined network. If building maintenance is required, the waste processing operation will cease.

A natural sloped banking is currently constructed around large sections of the permitted area to maintain the site boundary. To the front and side of the site, an 6ft fence line is already in place. This will delineate the permitted area from the surrounding area and act as security barrier also.

Accident and Incident Plan

The site is only permitted to accept non-hazardous wastes and so the risks of contamination are very low. The site is to be operated 24/7 and employs a full-time security guard that monitors the site after hours for malfunction, break in and incident (such as fire) during shutdown times at Christmas etc. Security monitoring is undertaken continuously through the nights via CCTV and by a physical walk around the entire site each hour.

Site Information

SITE LOCATION DETAILS	
Unit phone no: 01495 772255	
EMERGANCY CONTACT DETAILS	
Emergency services: 999	
Local Police: 999	
Natural Resource Wales: 0300 065 3000	
COMPANY CONTACTS (Out of hours)	
Director:	Jonathan Pallas

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.

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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. In the case of a fire on the site, the FRS will be called immediately.

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 table.

Accident Type	Risk Reduction	Anticipated Consequences	Action to be taken (listed in order of priority)	Likelihood of occurrence
1. Overflow or failure of (if applicable): • 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	Regular checks of all areas listed to ensure that integrity is still maintained.	Potentially polluting liquids flow over yard to drains and off site, potentially to groundwater.	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: Drains: • block with sandbags • cover top with drainblocks 4. Runoff from edge of yard to be stemmed - use sandbags down gradient of drains to contain spillage within site and direct any	Low-Medium

Accident Type	Risk Reduction	Anticipated Consequences	Action to be taken (listed in order of priority)	Likelihood of occurrence
risk of entering site. • Contaminated surface water from firefighting or other emergency activity.			contamination into drains or pooled area 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 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.	

Accident Type	Risk Reduction	Anticipated Consequences	Action to be taken (listed in order of priority)	Likelihood of occurrence
2. Fire • fuels & oils • chemicals • buildings • wastes	Ensure that all inspections are always undertaken. Each area needs to be inspected daily (logged in EMS) and if and defects are noted, managed appropriately. Ensure full compliance with the approved FPMP.	Spreading between buildings and stores. Toxic and polluting smoke. Wind dispersion of pollutants. Surface runoff from firefighting water.	1. Raise alarm on site and use the FPMP appropriately. 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. 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.	Medium

Accident Type	Risk Reduction	Anticipated Consequences	Action to be taken (listed in order of priority)	Likelihood of occurrence
			11. Do not enter or permit others to enter affected area unless it is safe to do so to evacuate persons. 12. Ensure firefighting 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.	
3. Severe weather *Flood *Heat wave	Maintain checks of local weather conditions by keeping up to	Overflow of storage facilities, power outages, fire or burst	1. As above to raise alarm if required. 2. Start emergency generator/obtain and have	Medium

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Accident Type	Risk Reduction	Anticipated Consequences	Action to be taken (listed in order of priority)	Likelihood of occurrence
*Excessive winds *Drought *Snow/freezing temps	date with reports. Ensure that water stores are topped up during dry conditions (see FPMP for further detail). Regular checks of exposed pipework, insulate/brace where required. Keep drains free from silt and debris by ensuring that regular maintenance is undertaken.	pipework (water). Increase in litter through wind speeds could be noted across the site and potentially in the surrounding areas. Increased risk of dust during dry conditions.	qualified electrician install if required. 4. Initiate waste removal from site if required during flood conditions. This will be done if severe flooding of the entire site occurring as the plastic may be able to be relocated to a separate area on site due to its size. Only the front waste storage area is impacted by high risk of flooding. Please see CAP_Environmental_RA for further information. 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.	
4. Plant breakdown	The site have a comprehensive planned maintenance programme to ensure that	Waste materials could back up and cause	1.Initiate the cancellation of all incoming waste deliveries beyond those already in transit.	Low

Accident Type	Risk Reduction	Anticipated Consequences	Action to be taken (listed in order of priority)	Likelihood of occurrence
	the plant is working well and effectively.	longer storage times on site. The plant could leak, but unlikely due to the type of plant and its operation. The site only has 1 fuel based forklift on site.	2.Contact the service engineering company to visit site. 3.Initiate the repair and recommissioning of the plant. 4. Contact NRW if required.	

Reporting

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

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

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

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

Training and Record Keeping

All staff are trained in their area of requirement and are instructed on the procedures required to operate the facility correctly and in compliance with any permits held. The site has been operational under a RPS for many years and so the staff are competent in their roles and responsibilities. Detailed and updated training logs are held within the site office for each employee and are updated every 4 months.

The site is manned and supervised at all time throughout working operation and in particular when waste materials are being handled.

An example training record and training needs checklist is found in the annex schedule below.

Complaints

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

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

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

In recognising that some causes of complaints, such as dust and noise, can be transient and short-lived, timely notification of complaints directly from the complainant or Natural Resources Wales is imperative to allow for appropriate investigation. If the complaint occurs more than 12 hours before notification is provided to the Operator, it may not be possible to substantiate the complaint or pinpoint the cause. The Operator will, however, contact the complainant where possible, review any operations at the time which had the potential to cause the complaint and complete and record a comprehensive complaint investigation. For complaints received within 12 hours of the incident the following actions will be undertaken:

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

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

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

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

Closure and Decommissioning

Preamble

The site is not an originally a purpose-built recycling site and was previously owned and operated by ITW Foils under the terms of the relevant environmental permit. ITW closed the site and surrendered their permit in 2019. Work to remedy environmental concerns took place in 2018-19 and were certified as sufficient by the relevant local authorities.

Coveris Group have acquired the site for future expansion and development and have no intention to close the site in the future. Closure would therefore only be considered if environmental and economic constraints in Wales deteriorated significantly vs other regions of the UK.

Purpose

This plan indicate how buildings, infrastructure and any remaining site utilities and wastes will be dealt with when the site is close or decommissioned. The plan will be updated periodically in the event of any pollution incidents which may occur during the operations of the permitted site, together with steps taken to remedy pollution at the time. This will help establish whether the site is in a satisfactory state when permitted activity ceases and the relevant permit is surrendered.

Methodology

Buildings

Coveris/Recover own the site and the buildings on that site. However in the event of decommissioning these buildings would be left in place, and the site would be leased or sold to new occupiers. An asbestos survey took place in Feb 22 and any remedial actions required will be carried out shortly. At

point of closure a further asbestos survey will take place and any further remediation required will be carried out as part of the sale/lease process.

Soil/Ground water

Processes carried out on site will not have a significant impact on soil or ground water so the risk of environmental impact is low.

A soil/ground water survey is planned for April 2023 to create a benchmark against which to measure future environmental impact. At the point of closure, a further soil/ground water survey would be carried out to confirm no unacceptable deterioration against this benchmark. Such works as required to remedy any issues identified would be carried out before the site is vacated.

Drainage/Wastewater

A drainage survey in planned for 27 Feb 2023 to determine a benchmark and identify any works required to remedy any issues identified. At the point of closure, a further drainage/wastewater survey would be carried out to confirm no unacceptable deterioration against this benchmark. Such works as required to remedy any issues identified would be carried out before the site is vacated.

Removal of machinery – shredder, conveyor lines, plastics reprocessor (Erema)

The reprocessing line is most unlikely to cause any environmental impact during the decommissioning process. All machinery on site can be decommissioned and disassembled down to component parts which can be removed by normal transport arrangements similar to those used to move feedstock to/from site during normal planned operations. All decommissioning activities with used Best Available Techniques (BAT) in agreement with public protection services.

There are no hazardous substances contained with the machinery which will create a risk during the decommissioning process other than lubricating oils. Typically, the machinery used in the decommissioning and equipment removal process will be cherry pickers, cranes, haulage vehicles. No excessive noise and other environmental impact is expected. Any oils present will be drained from machines were required and disposed of using a licensed waste carrier.

Chillers

On-site chiller operate on a closed loop basis using commercial refrigerant, which provides a open circuit source of chiller water using in cooling recycled materials. The equipment will be removed will refrigerant in place. If disposed of this will be done in accordance with appropriate environmental legislation.

Co2 Fire Suppression System

C02 cylinders will be removed from site by a licenced carrier. Residual pipework will be removed and disposed of if required by the post decommissioning site/sale lease process.

Fuel/Diesel Tank

The on-site diesel tank will be drained before removal, an any residual fuel will be disposed of using a licenced waste carrier. Once removed the tank itself will be disposed of using a licenced waste carrier.

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Waste Feedstock

Whilst the site contains approx. 200t of waste feedstock during normal operations, this will be consumed during pre-shut down reprocessing activities. At the point of closure it is expected that the majority of waste feedstock on stie will be consumed during these pre-shutdown activities. Any residual waste feedstock unsuitable for reprocessing in this way will be removed from site and disposed of using a licenced waste carrier.

Annex List

Maintenance/inspection Checklist

Week Commencing:	

Area to Inspect	Frequency	Mon	Tue	Wed	Thurs	Fri	Sat	Sun
Discharges off site	Daily							
Site security	Daily							
Fires	Daily							
Plant/equipment	Daily							
Litter	Daily							
Dust	Daily							
Noise	Daily							
Mud on highway	Daily							
Odour—if required	Weekly							
Vermin	Weekly							
Fuel tank	Weekly							
Concrete areas	Weekly							
Drainage system and water supply	Weekly							
Waste composition	Monthly							
Spill kit contents	Monthly							
Waste quantities on site	Quarterly							

Inspection Completed By:
Date:
Time:
Signature:

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

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

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

Defect Report Sheet

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

Assessment undertaken by:	Management member contacted:
Date:	

Mitigation Action Report

Report Completed by:	
Date and Time:	

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

Defect Closure completed by:	
Date and Time:	

Planned Preventative Maintenance(PPM) Schedule

MAIN PRODUCTION LINE INSPECTION (WEEKLY)	
To be carried out in conjunction with Guard & E Stop Inspection	
Refer to relevant operation / maintenance manual for inspection procedures	
Company / Site:	**ReCover / Blaenavon**
Equipment Ref. / ID No.	**EREMA Production Line**

CHECK AREA	INSPECTION AREA	IN ORDER		COMMENTS / ACTION REQUIRED / DRAWING REF.
		YES	NO	
Intake Feed Elevator	Visual inspection			
Intake Feed Elevator	Belt tracking			
Intake Feed Elevator	Belt tension			
Intake Feed Elevator	Lubrication			
Intake Feed Elevator	Clean under / around elevator			
Intake Feed Elevator	Overall condition			
Vecoplan Shredder	Condition of counter knife			
Vecoplan Shredder	Check / clear material build up under hydraulic ram			
Vecoplan Shredder	Check drive belt tension (adjust as required)			
Vecoplan Shredder	Check all hydraulic connections for leakage			

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CHECK AREA	INSPECTION AREA	IN ORDER		COMMENTS / ACTION REQUIRED / DRAWING REF.
		YES	NO	
Vecoplan Shredder	Check hydraulic oil unit (top up as required)			
Vecoplan Shredder	Check cooling system condition			
Vecoplan Shredder	Check coolant level (top up as required)			
Vecoplan Shredder	Lubricate all grease points			
Vecoplan Shredder	Clean (vacuum) motor cooling fan			
Vecoplan Shredder	Clean under / around shredder unit			
Vecoplan Shredder	Overall condition			
Magnet & Feed Elevator	Visual inspection			
Magnet & Feed Elevator	Belt tracking			
Magnet & Feed Elevator	Belt tension			
Magnet & Feed Elevator	Condition of support chains & frame			
Magnet & Feed Elevator	Security of waste bin			
Magnet & Feed Elevator	Clean under / around elevator			
Magnet & Feed Elevator	Overall condition			
Drum Feed Elevator	Visual inspection			
Drum Feed Elevator	Belt tracking			
Drum Feed Elevator	Belt tension			
Drum Feed Elevator	Lubrication			
Drum Feed Elevator	Clean under / around elevator			
Drum Feed Elevator	Overall condition			
Compressed Air System	Check air dryer working & check auto drain function			
EREMA	Clean blower grid			002
EREMA	Check PCU knives			004

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CHECK AREA	INSPECTION AREA	IN ORDER		COMMENTS / ACTION REQUIRED / DRAWING REF.
		YES	NO	
EREMA	Clean degassing units & equalising reservior			007
EREMA	Check PCU oil level (top up as required)			011
EREMA	Check pelletising knives			014
EREMA	Check sealing faces of pelletising housing			015
EREMA	Clean screen insert			016
EREMA	Lubricate seals of PCU & extruder			038
EREMA	Clean mesh bottom of water filter & pressure reducer			039
EREMA	Check cooling liquid reservoir oil level			040
EREMA	Clean vacuum system & check for tightness			041
EREMA	Check process water screen (clean as required)			043
EREMA	Calibrate probes at process water tank			044
EREMA	Clean space between suction funnel & PCU hood			045
EREMA	Clean filter candle (filter unit)			046
EREMA	Clean filter drum			055
EREMA	Clean centrifuge screen			056
EREMA	Remove fines from cyclone screen			059
EREMA	Clean LEV filter for PCU			
EREMA	Check condition of all compressed air lines, connections & signage			
EREMA	Check condition of all hydraulic hoses, pipes, connections & signage			
EREMA	Check condition all coolant hose, pipes, connections & signage			

CHECK AREA	INSPECTION AREA	IN ORDER		COMMENTS / ACTION REQUIRED / DRAWING REF.
		YES	NO	
FURTHER COMMENTS				
Inspected by:				
Date:				
Production Manager:				
Date:				

MAINTENANCE REFERENCE DRAWING

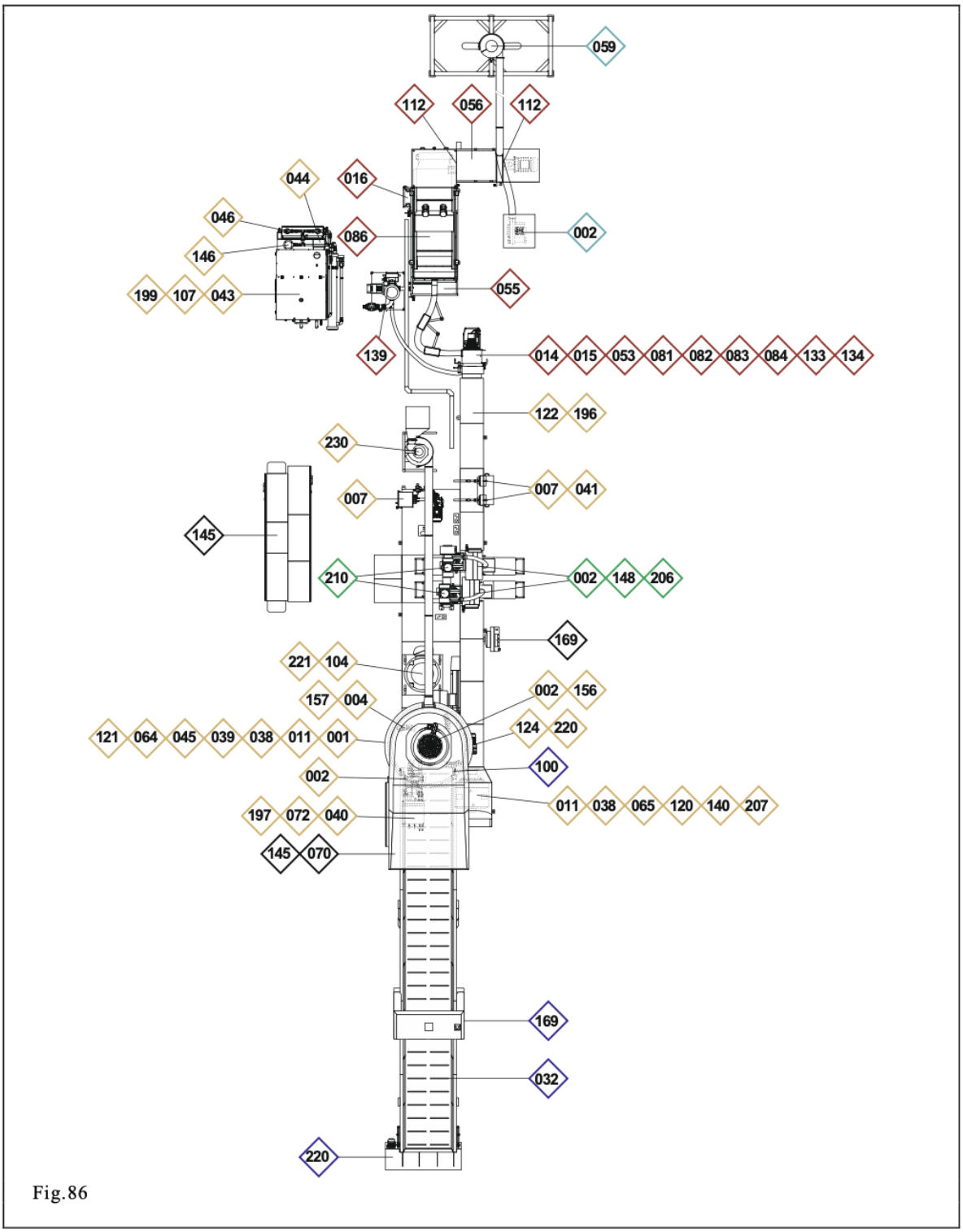

Fig.86

GUARD & EMERGENCY STOP INSPECTION	

Company / Site:	ReCover / Blaenavon
Equipment Ref:	EREMA Production Line

Ref No.	Description / Type	Location	IN ORDER / FUNCTIONING		COMMENTS / ACTION REQUIRED
			YES	NO	
A	Emergency Stop - Button	Vecoplan Control Panel			
B	Emergency Stop - Button	Metal Detector			
C	Emergency Stop - Button	Metal Detector			
D	Emergency Stop - Button	EREMA Control Panel			
E	Emergency Stop – Pull Cord	Shredder Feed Elevator			
F	Emergency Stop – Pull Cord	Shredder Feed Elevator			
G	Emergency Stop – Pull Cord	Magnet Feed Elevator			
H	Emergency Stop – Pull Cord	Magnet Feed Elevator			

Ref No.	Description / Type	Location	IN ORDER / FUNCTIONING		COMMENTS / ACTION REQUIRED
			YES	NO	
1	Control Panel	Panel / Fixed			
2	Shredder (Wall Side)	Panel / Fixed			
3	Magnet Feed Elevator Tail	Fixed			
4	Shredder (Rear Upper)	Panel / Fixed			
5	Shredder (Rear Lower)	Interlocking Panel			
6	Shredder (Inner Upper)	Interlocking Panel			

Ref No.	Description / Type	Location	IN ORDER / FUNCTIONING		COMMENTS / ACTION REQUIRED
			YES	NO	
7	Shredder (Inner Lower)	Interlocking Panel			
8	Magnet Feed Elevator (Upper)	Fixed			
9	Magnet Feed Elevator (Lower)	Fixed (Flexible Material)			
10	Magnet Frame	Fixed (x2)			
11	Magnet Frame	Fixed (x3)			
12	Magnet Frame	Fixed (x2)			
13	Magnet Frame	Fixed (x4)			
14	Magnet Frame	Fixed (x2)			
15	Electrical Supply Panel	Panel / Fixed			
16	Drum (Upper Access Doors)	Latched Panel (x3)			
17	Drum (Lower Access Door)	Interlocked			
18	Control Panel	Panel / Fixed			
19	Laser Filter Waste (Inner)	Fixed			
20	Heater Band (Inner)	Fixed			
21	Laser Filter Waste (Outer)	Fixed			
22	Heater Band (Outer)	Fixed			
23	EREMA Line	Fixed			
24	Waste Outlet	Fixed			
25	Extrusion Head	Interlocked			
26	Electrical Supply Panel	Panel / Fixed			
26	Centrifuge	Interlocked			
FURTHER COMMENTS					

Ref No.	Description / Type	Location	IN ORDER / FUNCTIONING		COMMENTS / ACTION REQUIRED
			YES	NO	

Inspected by:	
Date:	
Production Manager:	
Date:	

MAIN PRODUCTION LINE INSPECTION (PPM / MONTHLY)	
To be carried out in conjunction with Main Production Line Inspection (Weekly) & Guard & E Stop Inspection	
Refer to relevant operation / maintenance manual for inspection procedures	
Company / Site:	**ReCover / Blaenavon**
Equipment Ref. / ID No.	**EREMA Production Line**

CHECK AREA	INSPECTION AREA	IN ORDER			COMMENTS / ACTION REQUIRED / DRAWING REF.
		YES	NO	N/A	
Vecoplan Shredder	Check screen condition (replace as required)				
Vecoplan Shredder	Check all ram seals, hydraulic hoses, pipes & connections				
Vecoplan Shredder	Check hard rubber wheels (replace as required)				
Vecoplan Shredder	Check sealing of back wall (replace seals as required)				
Vecoplan Shredder	Replace oil filter ***(every 4 months / 2000 hours)***				
Vecoplan Shredder	Replace hydraulic power unit oil ***(every 4 months / 2000 hours)***				
Vecoplan Shredder	Change coolant ***(every 24 months / 12000 hours)***				
EREMA	Test alarm signalling & shock sensor				070
EREMA	Check coolant system filters (clean as required)				072
EREMA	Clean nozzles & check clamps on pelletising nozzle				081
EREMA	Check bearings on pelletising shaft				082
EREMA	Check pelletising breaker plate (clean as required)				083

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CHECK AREA	INSPECTION AREA	IN ORDER			COMMENTS / ACTION REQUIRED / DRAWING REF.
		YES	NO	N/A	
EREMA	Check 'O' ring on pelletising housing (replace as required)				084
EREMA	Change water in process water reservoir				107
EREMA	Lubricate centrifuge bearing				112
EREMA	Change extruder gearbox oil ***(every 2 months / 1000 hours)***				120
EREMA	Change PCU gearbox oil ***(every 2 months / 1000 hours)***				121
EREMA	Dismantle & clean extruder screw ***(every 2 months / 1000 hours)***				122
EREMA	Clean input slider housing & lubricate ***(every 2 months / 1000 hours)***				124
EREMA	Clean & inspect degasser immersion pump ***(every 3 months / 1000 hours)***				146
EREMA	Check hinge of pelletising housing ***(every 4 months / 1500 hours)***				133
EREMA	Replace 'O' ring on pelletising housing ***(every 4 months / 2000 hours)***				134
EREMA	Clean water pump ***(every 4 months / 2000 hours)***				139
EREMA	Change extruder gearbox oil ***(every 4 months / 2000 hours)***				140
EREMA	Check TROX exhaust ***(every 8 months / 4000 hours)***				156
EREMA	Check PCU knife holder for wear ***(every 8 months / 4000 hours)***				157
EREMA	Check extruder screw wear				196

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CHECK AREA	INSPECTION AREA	IN ORDER			COMMENTS / ACTION REQUIRED / DRAWING REF.
		YES	NO	N/A	
	(every 12 months / 6000 hours)*				
EREMA	**Replace thermal oil coolant** ***(every 12 months / 6000 hours)****				
EREMA	**Clean process water reservoir** ***(every 12 months / 6000 hours)****				
EREMA	**Lubricate cardan shaft** ***(every 12 months / 6000 hours)****				
EREMA	**Replace laser filter gearbox oil** ***(every 36 months / 18000 hours)****				
EREMA	**Change feed elevator gearbox oil** ***(every 36 months / 18000 hours)****				
EREMA	**Replace PCU V belt** ***(every 36 months / 18000 hours)****				

FURTHER COMMENTS	
Inspected by:	
Date:	
Production Manager:	
Date:	

MAINTENANCE REFERENCE DRAWING

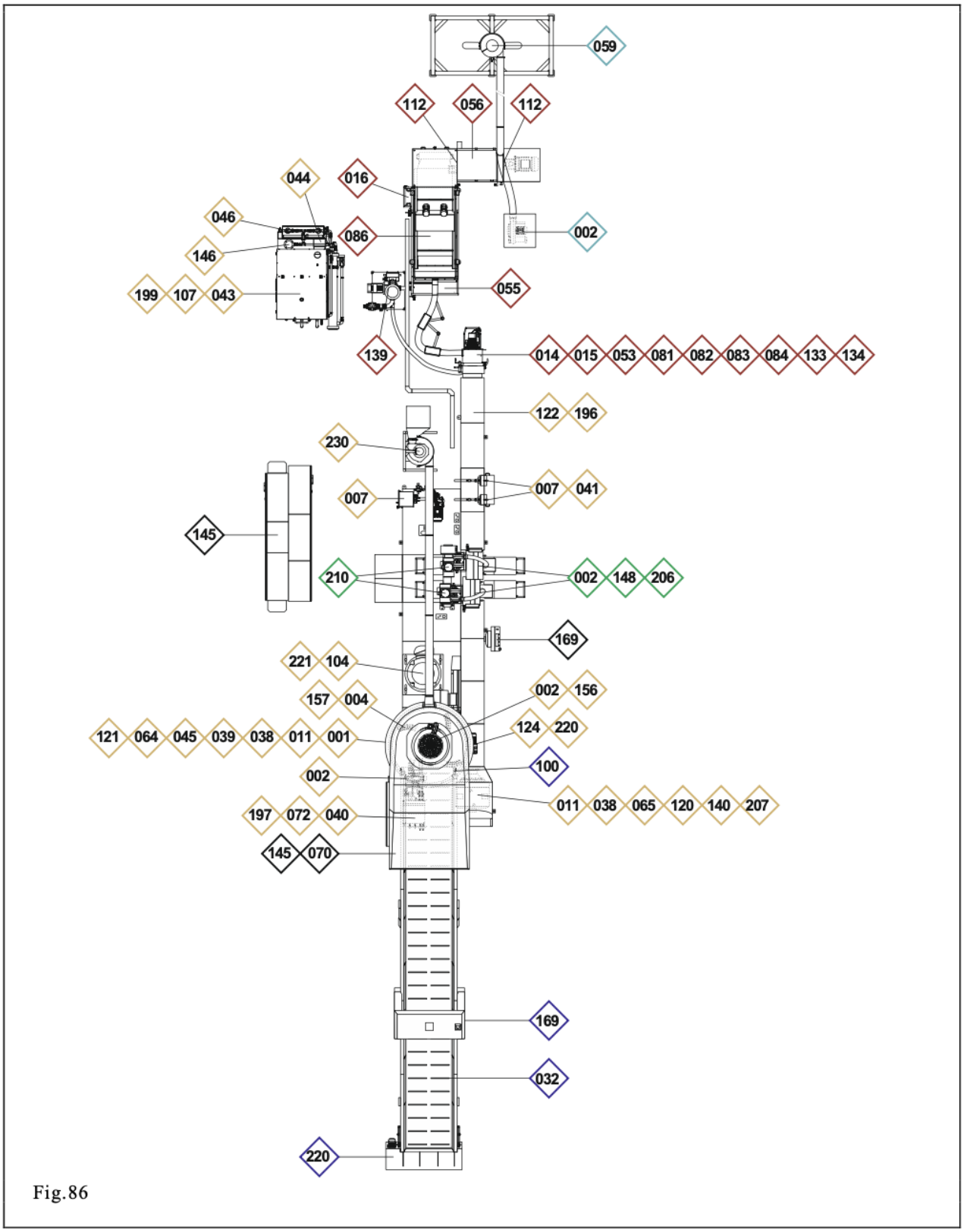

Fig.86

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Site Plan-general layout and features

Site Plan-sensitive receptors/areas of receptors within 1km

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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	

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Training Needs Checklist

Employee	Training Required*															Comments
	Environmental Awareness					Maintenance / Operations					Accidents and Emergency					
	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		