



## Permit Application

Elis UK Ltd  
Bulwark Road,  
Bulwark Industrial Estate,  
Chepstow,  
NP16 5QZ



PROVIDING SOLUTIONS, ENSURING COMPLIANCE

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## Document Control Table

Project Reference	21/012h
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## Change log

Version	Changes	Produced by	Checked by	Authorised by	Date
1 R1	Issued	Emma Gibson	Kate Brady	-	30 November 2022
1 R2	Application re-submission following FPMP and Odour Management Plan preparation.  Add waste codes for medicine waste.	Emma Gibson	Tracey Westbury	Tracey Westbury	01 March 2023



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## 1. Introduction

- 1.1. Westbury Environmental Limited have been instructed to prepare this Environmental Permit application on behalf of Elis UK Limited (Operator). The aim of the application is to allow the operation of a clinical waste transfer station for the short-term storage of small quantities of non-hazardous waste.
- 1.2. The relevant Natural Resource Wales forms (Part A, Part B2, Part B4, Part F1) and supporting information are enclosed within this Environmental Permit application report.
- 1.3. A previous version of this application was submitted in July 2022 and returned pending production of a Fire Prevention & Mitigation Plan (FPMP) and an Odour Management Plan.
- 1.4. The Site proposes to accept up to 1,000 tonnes of waste per year and store up to 50 tonnes of waste on Site at any one time.
- 1.5. An FPMP has been provided to support this application, see Appendix 1. However, this FPMP accounts for 6 tonnes of waste to be stored on the Site at any one time. This is due to the fact that at present the operator only has infrastructure to store this amount. The operator has plans to expand the storage infrastructure in the future. We have included a 50-tonne limit for storage in the permit application to avoid the need for a permit variation application in the future. We therefore anticipate that the permit will include an improvement condition requiring the submission and approval of a further FPMP prior to storage of more than 6 tonnes. We are unable to prepare the FPMP at this time for the infrastructure that will allow 50 tonne storage limits as the details of this are unknown at this time.
- 1.6. Due to the low risk posed by the proposed waste activity (secure storage only), waste types, volumes stored and storage duration, it had been considered that a Fire Prevention & Mitigation Plan and Odour Management Plan was not required.
- 1.7. Following a formal request from Natural Resources Wales, both a Fire Prevention & Mitigation Plan and Odour Management Plan have been included in this revision of the application, see Appendix 1 Fire Prevention & Mitigation Plan and Appendix 2 Odour Management Plan.

### Overview of proposals

- 1.8. The proposed waste operation will be carried out at Bulwark Road, Bulwark Industrial Estate, Chepstow, NP16 5QZ (the Site), see Permit Boundary Plan, Drawing No. 21/012h 001.
- 1.9. The proposed waste activities are to store and transfer washroom and medicine waste predominantly from commercial and industrial sectors. The proposed waste types are non-hazardous and non-biodegradable. A full list of waste codes has been included in Section 3.
- 1.10. As some of the proposed waste types are classified by a category 18 code – Healthcare waste, i.e., sanitary waste originating from healthcare facilities including nursing homes, Natural Resource Wales have confirmed that the activity will be classed as a Clinical Waste Transfer Station.

### Operator

- 1.11. The Operator's main business activity is the operation of a commercial laundry service.
- 1.12. As part of the service contracts, the Operator provides washroom supplies and removes contracted washroom waste. It is estimated that this aspect comprises less than 10% of their business.
- 1.13. They operate a number of sites around the UK with the majority of sites, presently located in England.

### Application fee abatement

- 1.14. It is considered that the proposed operations would pose a **low** risk to the environment for the following reasons:
  - Waste throughputs are expected to be less than 1,000 tonnes per year. The Operator will store a maximum quantity of 50 tonnes of waste, at any one time.



- Waste will be stored securely, in appropriate containers on impermeable surfacing with sealed drainage.
- 1.15. The application fee for a Standard Rule's (SR) set application which would allow the same activity (in England) in greater quantities and wider selection of waste types (SR2008 No24 Standard Rules for transfer of healthcare waste) would be £3,926 and includes assessment of a Fire Prevention & Mitigation Plan. The fee for this bespoke permit application in accordance with the OPRA spreadsheet is £10,500.
  - 1.16. The SR2008 No24 permit allows for significantly more waste codes to be accepted for storage and sorting on Site with an annual throughput of 5,000 tonnes per year. It is considered the environmental risk posed by the proposed waste activities would be lower than those posed by Standard Rules set SR2008 No24.
  - 1.17. It is acknowledged that the equivalent SR set is valid in England and not Wales. However, it is considered that the assessment fee comparison, relative to risk to the environment, would be similar.
  - 1.18. Therefore, an abatement of the application fee is being requested on a time-spent basis.
  - 1.19. It is considered that the time spent fee would be closer to the fee for a SR set, plus assessment of an odour management plan, than the bespoke application fee for a fully functional Clinical Waste Transfer Station.



## **2. Site location and setting**

- 2.1. The Site is located on Bulwark Road, Bulwark Industrial Estate, Chepstow, NP16 5QZ, see Permit Boundary Plan, Drawing No. 21/012h 001.
- 2.2. The surrounding land-uses include laundry facility (located on the wider Elis UK site), other industrial users on the Bulwark industrial estate, agricultural land, ancient woodland, and residential dwellings.
- 2.3. Bulwark Camp containing two historic monuments (the Bulwarks and St Peters Cave) is 37m south of the Site.
- 2.4. An area of Broadleaved Woodland borders the northern boundary of the Site.
- 2.5. The nearest residential housing is located approximately 95m southwest of the Site on Alpha Road.
- 2.6. Chepstow trainline passes approximately 35m east of the Site.
- 2.7. The Site is located within a flood zone 1 so low to negligible risk of flooding and contamination.

### **Site Condition Report**

- 2.8. A copy of the Site Condition Report – Part 1 is enclosed as Appendix 3.
- 2.9. As the Site is on impermeable surfacing, there were reported to be no evidence of past contamination.
- 2.10. There are no reported prior incidents which may pose a source of contamination.
- 2.11. It is reported there are no odours detected from the Site itself or the materials on Site.

### **Drainage**

- 2.12. Waste storage areas comprise impermeable surfacing, with kerbing to contain any run-off. There is no discharge from the waste storage areas. Any controlled water will be contained and removed from Site to a suitably licenced facility.



### 3. Waste operations

#### Waste activities

- 3.1. Waste activities will comprise of the secure storage and transfer of select non-hazardous, washroom and medicine waste.
- 3.2. All waste will be collected separately and stored appropriately at the Site before being transferred to a suitably licenced facility. Further detail on storage is provided below.
- 3.3. There will be no treatment or sorting of waste carried out on Site.

#### Waste types and quantities

- 3.4. The waste will comprise of non-infectious sharps (18 01 01, 18 02 01 and 20 01 99), feminine hygiene products, nappies, and bandages (18 01 04), non-hazardous medicines (18 01 09, 18 02 08 and 20 01 32) and other separately collected non-hazardous waste, e.g., non-infectious sharps, dead animals, or vomit (20 01 99).
- 3.5. The proposed waste types and quantities, as they may appear in the environmental permit, are presented in Table 3.1.
- 3.6. No liquid waste will be accepted at the Site.

**Table 3.1: Proposed waste types and quantities**

<b>Maximum quantities</b> The total quantity of waste accepted at the site shall be less than 1,000 tonnes a year and no more than 50 tonnes on Site at any one time.	
Waste code	Description
<b>18</b>	<b>Healthcare waste</b>
<b>18 01</b>	<b>Natal care – diagnosis – treatment or prevention of disease in humans</b>
18 01 01	Sharps (except 18 01 03)
18 01 04	Waste whose collection and disposal is not subject to special requirements in order to prevent infection (for example dressings, plaster casts, linen, disposable clothing, diapers) Feminine hygiene products, nappies, bandages, and similar items.
18 01 09	Medicines other than those mentioned in 18 01 08
<b>18 02</b>	<b>Research – diagnosis – treatment or prevention of disease involving animals</b>
18 02 01	Sharps (except 18 02 02)
18 02 08	Medicines other than those mentioned in 18 02 07
<b>20</b>	<b>Municipal and similar materials from commerce and industry</b>
20 01	Separately collected fractions (except 15 01)
20 01 32	Medicines other than those mentioned in 20 01 31
20 01 99	Non-infectious sharps, dead animals, vomit, feminine hygiene products, nappies, bandages, and similar items. Or other non-hazardous fractions not otherwise specified.

#### Waste collection and storage

##### Sanitary waste

- 3.7. Sanitary waste will be collected in bags from multiple washrooms and placed into a larger bag for transit.
- 3.8. Upon arrival at the Site, the double-bagged waste will be placed into an enclosed, lockable bin (triple containment). A photograph showing an example of the type of bin the waste will be stored is shown in Figure 3.1. The actual bin will be metal rather than plastic.



- 3.9. Sanitary waste will be stored for no longer than 7 days.
- 3.10. The double bagged storage is a result of the waste collection process and is not deemed essential mitigation of odour or pollution. However, the triple containment of the waste will have the effect of providing mitigation against both odour, leakage, and interaction with other waste. The short storage time will also help mitigate against odours developing.
- 3.11. This waste will subsequently be collected and taken to a licenced facility.

#### Medicine waste

- 3.12. Medicine waste will be collected in 'blue-stream" pharmaceutical waste bins. It is considered that the medicine waste will consist of blister packs and non-hazardous domestic 'over the counter' medicines which are expired, unused, damaged, or no longer needed.
- 3.13. The bins in which the medicine waste is collected remain sealed so no contamination or mixing of waste can occur.
- 3.14. Upon arrival at the Site the smaller sealed bins are collectively stored in secure larger storage containers.

#### Sharps

- 3.15. Sharps waste will be collected in sealed sharps bins. The bins in which the sharps are collected remain sealed so no contamination or mixing of waste can occur. Upon arrival to the Site, these smaller secure bins will be collectively stored in secure metal cages or bins.
- 3.16. Sharps accepted onto Site are collected from commercial properties and are non-infectious, including but not limited to:
- Stanley knives
  - Sewing needles
  - Scalpels and blades
  - Broken glass

#### Ancillary waste

- 3.17. It is not expected that ancillary waste will form a significant part of the waste collected, however there will be a need to store very small quantities of ad-hoc waste which arise from washrooms.
- 3.18. The source of the ad-hoc waste could be dead rodents which have found their way into washrooms and this type of waste will be incidental. There will be a separate sealed bin for incidental waste to be stored on Site. As for the sanitary waste, this waste will be collected separately and will be double bagged.





**Figure 3.1: Example of sealed bin used for the storage of waste**



All waste

- 3.19. All waste will be stored securely (within secure bins or cages) on impermeable surfacing.
- 3.20. Maximum storage times for all wastes are given in Table 3.2: Maximum waste storage durations.

**Table 3.2: Maximum waste storage durations**

Waste code	Waste description	Max storage duration
18 01 01	Sharps (except 18 01 03)	1 month <sup>1</sup>
18 01 04	Waste whose collection and disposal is not subject to special requirements in order to prevent infection (for example, dressings, plaster casts, linen, disposable clothing, diapers) Feminine hygiene products, nappies, bandages, and similar items.	7 days <sup>2</sup>
18 01 09	Medicines other than those mentioned in 18 01 08.	1 month <sup>1</sup>
18 02 01	Sharps (except 18 02 02).	1 month <sup>1</sup>
18 02 08	Medicines other than those mentioned in 18 02 07	1 month <sup>1</sup>
20 01 32	Medicines other than those mentioned in 20 01 31	1 month <sup>1</sup>
20 01 99	Non-infectious sharps, dead animals, vomit, feminine hygiene products, nappies, bandages, and similar items. Or other non-hazardous fractions not otherwise specified.	1 month <sup>1</sup>

<sup>1</sup> In accordance with FPMP/OM guidance and operational capacity

<sup>2</sup> In accordance with Appropriate Measures for Healthcare waste (offensive waste)



## 4. Environmental Risk

- 4.1. An Environmental Risk Assessment has been completed as part of this permit application, see Appendix 4 Environmental Risk Assessment.
- 4.2. The Environmental Risk Assessment considers the potential impacts of the proposed waste operations on the local receptors, population, watercourses, and protected sites.
- 4.3. Due to the small scale and low risk of the waste operations, it is considered that receptors greater than 50m from the Site are unlikely to be affected by the waste activities. The following receptors are within 50m of the Site boundary:
  - Broadleaved Woodland (bordering the northern boundary of the Site).
  - Gloucester to Newport train line (35m east).
  - Bulwark Camp (37m south).
- 4.4. The following protected habitats are identified within 3km of the Site:
  - The river Wye, a special area of conservation designated for a number of species present, including otters and freshwater fish such as the Atlantic salmon and European Bullhead is approximately 60m east of the Site.
  - Pennsylvania Fields a Site of Special Scientific Interest (SSSI) designated for its biological interest being an area of brackish pastureland overlying alluvial soils alongside the lower tidal part of the river Wye, which is the only example of this habitat in Gloucestershire is 185m east of the Site.
  - Beaufort Quarry a former working quarry which was surrendered in 2006 and has undergone ecological development to become a local wildlife site is 105m north of the Site.
  - Lower Wye gorge (England) SSSI designated for its biological interest, particularly the sites transition from saltmarsh to valley woodland bordering the tidal River Wye is 3km north of the Site. The area is also a breeding site for protected birds such as Kestrels.
  - The Severn Estuary (England) SSSI designated for its biological and geological features including littoral sediment habitats and aggregations of non-breeding birds is 1.5km east of the Site.
  - Pierce, Alcove and Piercefield Woods SSSI designated for its woodland species and geological variation is 1.2km north of the Site.
- 4.5. Due to the protective status of the receptors listed above, these receptors have also been considered within the Environmental Risk Assessment.
- 4.6. The Environmental Risk Assessment considers that based on control measures proposed, none of the receptors with protective status will be adversely impacted by the Site operations.
- 4.7. The requirements of a Fire Prevention & Mitigation Plan and Odour Management Plan are implemented on the Site reducing the risk to receptors.

### Fire

- 4.8. There is typically a risk of fire where combustible wastes are stored. The wastes to be stored on Site are capable of combustion, though they will be stored in small quantities in separate containers and will be removed within short timeframes.
- 4.9. In strict accordance with Natural Resource Wales' Fire Prevention & Mitigation Plan (FPMP) guidance, a Fire Prevention & Mitigation Plan has been prepared to support this permit application, see Appendix 1 Fire Prevention & Mitigation Plan.

### Odour

- 4.10. Some of the proposed wastes have odour-generating potential, the primary source for potentially malodorous waste being sanitary / washroom waste accepted under waste code 18 01 04. In accordance with appropriate measures guidance for healthcare waste, waste classified as 18 01 04 is considered to be 'offensive waste'.



4.11. The Odour Management Plan considers that the storage of these wastes at the Site pose a negligible risk of odour due to the following:

- Waste is double bagged in sealed bins (triple containment).
- Waste is stored only – no sorting or treatment.
- Waste is limited to storage.
- Waste bins are stored out of direct sunlight.
- Storage bins are regularly cleaned to prevent the build-up of odour.

4.12. An Odour Management Plan has been prepared to outline how the risk of odour from the waste storage activities will be prevented and managed such that there are no odour emissions from the Site, see Appendix 2 Odour Management Plan.

### **Noise and Vibration**

4.13. At present the Site carries out laundry services as part of their business which includes the offloading of laundry. It is considered the proposed waste storage will pose negligible additional risk of noise.

### **Dust**

4.14. Wastes accepted have low-dust potential as no wastes consisting solely or mainly of dust are accepted. It is considered the likelihood of dust generation and emissions from Site are negligible. Any wastes comprising solely or mainly of dust, fibres or particulates are rejected in accordance with the Waste Rejection Procedure.

4.15. The Environmental Risk Assessment considers that the storage of these wastes at the Site pose a negligible risk of dust. Wastes accepted have a negligible potential to create dust.

### **Conclusion**

4.16. The risk assessment has concluded that the considered risk to the local environment and human health from the acceptance and storage of the proposed waste types will be **very low**.



## 5. Non-technical summary

- 5.1. Elis UK Limited operate a major global company within the textile, hygiene, and facility service industry. They provide laundry and washroom services to the commercial, industrial, retail and hospitality sectors. Elis UK Ltd wish to be able to have short term storage of waste from their service contracts (predominantly washrooms) at a number of their Sites throughout the UK.
- 5.2. This application relates to their Site at Bulwark Industrial Estate, Chepstow, NP16 5QZ.
- 5.3. The Operator proposes to store the following wastes before transfer to a licenced facility.
  - Non-infectious sharps (18 01 01, 18 02 01 and 20 01 99).
  - Feminine hygiene products, nappies, and bandages (18 01 04).
  - Non-hazardous medicines (18 01 09, 18 02 08 and 20 01 32).
  - Other separately collected non-hazardous waste e.g., non-infectious sharps, dead animals, or vomit (20 01 99).
- 5.4. Waste will arrive double bagged or in sealed containers. The double bagged waste is then deposited by hand into sealed larger bins for onward transfer to a suitable permitted facility for recovery or disposal.
- 5.5. No sorting or treatment of waste is undertaken on Site.
- 5.6. Waste will be stored on impermeable surfacing.
- 5.7. No more than 50 tonnes of waste will be stored on site at any one time. No more than 1,000 tonnes of waste will be accepted onto the Site per annum.
- 5.8. The risk of adverse impact of the following have been considered in the Environmental Risk Assessment and the risk from each is considered to be low.
  - Noise
  - Dust
  - Odour
  - Fire
- 5.9. The Site will be operated in accordance with an Environmental Management System. The Environmental Management System (EMS) includes a Waste Acceptance Procedure which ensures that suitable waste types are accepted on to the Site.



## 6. Site management

### Environmental Management System Summary

- 6.1. The Site will be operated in accordance with specific procedures. The Operator commits to manage the permitted activities on Site in accordance with an Environmental Management System (EMS).
- 6.2. Application form Part B2 - Q3d3 requires that a summary of the EMS is submitted with the application. A summary of the EMS was provided with a previous version of this application. NRW provided advice that they needed detail on the following in order to assess the Summary EMS:

*“Site plans, Operations, Maintenance, Accidents and incidents, Site security, Non-compliance, Closure, Complaints, Sufficient competent persons, resources and training, Emissions and monitoring, Records, and Access to your permit.”*

- 6.3. Therefore, a copy of the EMS for the Site is included, see Appendix 5 Environmental Management System.
- 6.4. A hard copy of the EMS will be kept on Site at all times.

### Technical Competence Management

- 6.5. It is considered that the following WAMITAB course is appropriate for this waste application process:
  - WAMITAB Level 4 Certificate in Waste and Resource Management (VRQ), comprising of the following units:
    - VRQ401 - Health and safety in the waste and resource management industry
    - VRQ402 - Environmental protection in the waste and resource management industry
    - VRQ403 - Principles of sustainable waste and resource management
    - VRQ404 - Legislation for the operation of a waste management facility
    - VRQ405 - Stakeholder communication and other non-legislative factors affecting the waste and resource management industry
    - VRQ406 - Principles and practices of managing a physical treatment processing facility (Transfer and Treatment of non-hazardous waste).
- 6.6. Sean Goldsworthy is registered on the WAMITAB Level 4 course for the above units, see Appendix Evidence of Technically Competent Management.
- 6.7. The details for the Technically Competent Manager for the Site are presented in Table 6.1: Technical Competent Manager details.

**Table 6.1: Technical Competent Manager details**

<b>First Name</b>	Sean
<b>Last Name</b>	Goldsworthy
<b>Date of Birth</b>	09/05/1972
<b>Phone</b>	+44 (0) 1291 620 441
<b>Email</b>	Sean.goldsworthy@elis.com
<b>WAMITAB registration Number</b>	124172



**Drawings**

Drawing No. 21/012h 001      Permit Boundary Plan



Client: Elis UK Ltd

Chepstow Permit Boundary

Site:  
Bulwark Road,  
Bulwark Industrial Estate,  
Chepstow,  
NP16 5QZ

Date: 16 November 2022

Scale: 1:5,750

Reference: 21/012h 001

Drawn by: EG  
Checked by: KB



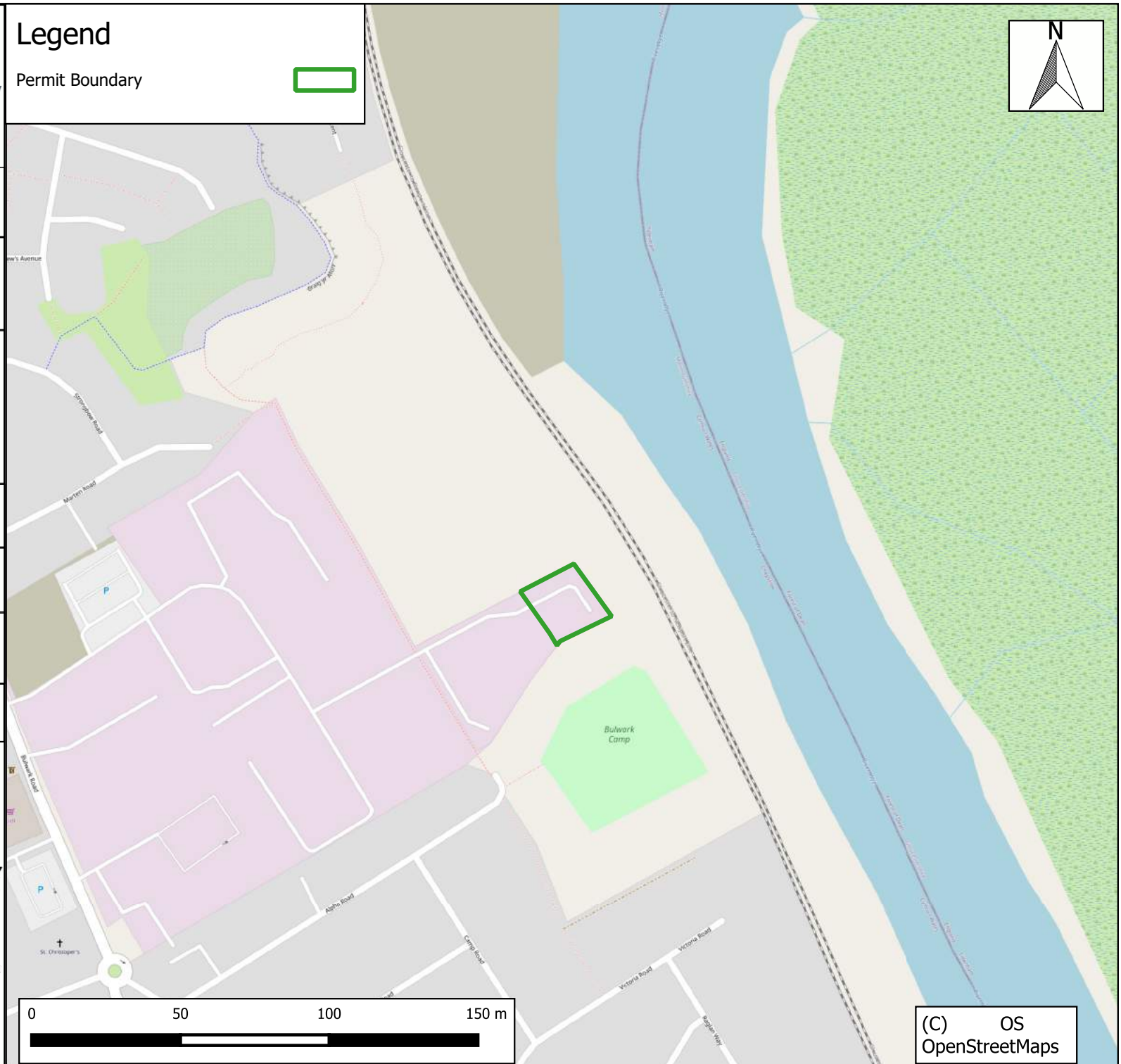
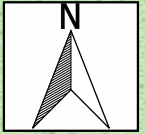
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## Legend

Permit Boundary



(C) OS  
OpenStreetMaps



**Application form**

Part A



# Application for an environmental permit:

## Part A – About you

<p><b>Fill in this part A if you are applying for a new permit, applying to change or surrender an existing permit, or want to transfer an existing permit to yourself.</b></p> <p>Please check that this is the latest version of the form available from our website.</p> <p>Please read through this form and the guidance notes that come with it. All relevant guidance documents can be found on our website.</p> <p>Where you see the term 'document reference' on the form,</p>	<p>give the document references and send the documents with the application form when you've completed it.</p> <p>Contents</p> <p>1 About you</p> <p>2 Applications from individuals</p> <p>3 Applications from organisations of individuals</p> <p>4 Applications from public bodies</p> <p>5 Applications from a registered company or other corporate body</p> <p>6 Your address</p> <p>7 Contact details</p>
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### 1 About you

Are you applying as an individual, an organisation of individuals (for example, a partnership), a company (this includes Limited Liability Partnerships) or a public body?

- |   |                                     |                        |
|---|-------------------------------------|------------------------|
| An individual   | <input type="checkbox"/>            | <i>Go to section 2</i> |
| An organisation of individuals (for example, a partnership) | <input type="checkbox"/>            | <i>Go to section 3</i> |
| A public body (such as a local council)                     | <input type="checkbox"/>            | <i>Go to section 4</i> |
| A registered company or other corporate body                | <input checked="" type="checkbox"/> | <i>Go to section 5</i> |

### 2 Applications from individuals

#### 2a Please give us the following details

Title	<input type="text"/>	
First name	<input type="text"/>	
Last name	<input type="text"/>	<i>Go to section 6</i>

### 3 Applications from organisations of individuals

#### 3a Organisation details

Organisation name	<input type="text"/>
Type of organisation	<input type="text"/>
If 'Other', please specify	<input type="text"/>

#### 3b Main representative's details

Title	<input type="text"/>
First name	<input type="text"/>

Last name

**3c Second representative's details:**

Title

First name

Last name

**3d Other representative's details**

If relevant, please provide details of all other representatives on a separate sheet and tick here to show that you have done so. ☐

*Go to section 6*

**4 Applications from public bodies**

**4a Public body details**

Public body name

Type of public body

If 'Other', please specify

**4b Executive officer's details**

The executive is an officer of the public body authorised to sign on your behalf.

Title

First name

Last name

Position

*Go to section 6*

**5 Applications from a registered company or other corporate body**

**5a Company details**

Company name

Company registration number

Date of registration

If you are applying as a corporate organisation that is now a limited company, please provide evidence of your status and tell us the reference number you have given this document with this evidence.

Document reference

*Go to section 6*

**6 Your address**

**6a Your main (registered office) address**

For companies this *must* be the address on record at Companies House.

Address

Postcode

RG24 8NE

Telephone - mobile

Telephone - office

01256 339200

Email address

Werner.dreyer@elis.com

If you are applying as an organisation of individuals, every partner needs to give us their details, including their title. If necessary, continue on a separate sheet and tell us the reference you have given the sheet.

Document reference

**6b UK business address *only* if different from above**

Address

See 6a.

Postcode

Telephone - mobile

Telephone - office

Email address

*Go to section 7*

**7 Contact details**

**7a Who can we talk to about your application?**

This can be someone acting as a consultant or 'agent' for you.

Title

Ms

First name

Tracey

Last name

Westbury

Address

Agriculture House

Southwater Way

Telford

Postcode	TF3 4NR
Telephone - mobile	
Telephone - office	01952 879705
Email address	info@westburyenv.co.uk

**7b Who can we talk to about your operation?**

Same as the application contact in 7a	<input type="checkbox"/>
Title	Mr
First name	Gary
Last name	Youngson
Address	Intec 3 Wade Road
	Basingstoke
Postcode	RG24 8NE
Telephone - mobile	07825891105
Telephone - office	
Email address	gary.youngson@elis.com

**7c Who can we talk to about your billing or invoice?**

Same as the application contact in 7a	<input type="checkbox"/>
Same as the operation contact in 7b	<input checked="" type="checkbox"/>
Title	
First name	
Last name	
Address	

Postcode

Telephone - mobile

Telephone - office

Email address




**Application form**

Part B2

# Application for an environmental permit:

## Part B2 – General: new bespoke permit

<p><b>Fill in this part of the form together with parts A and F1 or F2, if you are applying for a new bespoke permit.</b></p> <p><b>You also need to fill in part B3, B4, B5, B6, or B7 (depending on what activities you are applying for).</b></p> <p>Please check that this is the latest version of the form available from our website.</p> <p>Please read through this form and the guidance notes that came with it. All relevant guidance documents can be</p>	<p>found on our website.</p> <p>Contents</p> <ul style="list-style-type: none"> <li>1 About the permit</li> <li>2 About the site (not mobile plant)</li> <li>3 Your ability as an operator</li> <li>4 Consultation</li> <li>5 Supporting information</li> <li>6 Environmental risk assessment</li> <li>Appendix 1 – Low impact installation checklist</li> </ul>
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### 1 About the permit

#### 1a Discussions before your application

If you have had discussions with us before your application, give us the case reference or details on a separate sheet.

Case or document reference

#### 1b Is the permit for a site or for a mobile plant?

Note: The term 'mobile plant' does not include mobile sheep dipping unit.

Site ☒ *Go to section 2*

Mobile Plant ☐ *Go to section 1c*

#### 1c Have we told you during pre-application discussions that we believe that a mobile permit is suitable for your activity?

No ☐

Yes ☐

#### 1d Have there been any changes to your proposal since this discussion?

No ☐ *Go to section 3*

Yes ☐ Send us a description of the activity you want to carry out, highlighting the changes made since our pre-application discussions. Give us the reference, below.

Document reference  *Go to section 3*

### 2 About the site (not mobile plant)

#### 2a What is the site name, address, postcode and national grid reference?

Site name

Address

Postcode

NP16 5QZ

National grid reference for the site (12 digit)

**2b How many regulated facility types are you applying for?**

- One ☒ *Go to section 2c*
- Two or more ☐ *Go to section 2d*

**2c What type of regulated facility are you applying for? (For one facility type only.)**

- Installation ☐ *Tick the relevant box in 2c1*
- Waste operation ☒ *Tick the relevant box in 2c2*
- Mining waste operation ☐ *Tick the relevant box in 2c3*
- Water discharge activity (all) ☐ *Go to section 3d*
- Medium Combustion Plant Only ☐ *Tick the relevant box in 2c4*
- Medium Combustion Plant/Specified Generator combined ☐ *Tick the relevant box in 2c4*
- Specified Generator Only ☐ *Tick the relevant box in 2c4*

What is the national grid reference for the regulated facility? (See the guidance notes on part B1 and note the different requirement for water discharge activities.)

- As in 2a above ☐
- Different from 2a ☐ Please fill in the national grid reference below

National grid reference for the facility

ST 53701 92756

**What is the type of activity?**

**2c1 Installation**

- Intensive farming installation ☐
- Local authority (Part A (2) and Part B) ☐
- Low impact installation (see question 2e below) ☐
- Opra charged activity ☐
- Directly associated activity ☐
- Paragraph-17 installation ☐

**2c2 Waste Operation**

- Landfill gas facility (closed landfill) ☐
- Opra charged activity ☒
- Tier 2 charged bespoke activity (see charging guidance for list) ☐
- Pet cemetery ☐

**2c3 Mining waste operation**

- Non-Opra charged activity ☐
- Opra charged activity **Go to section 2e**

**2c4 Medium Combustion Plant/Specified Generator**

- Tier 2 charged complex bespoke activity (see charging guidance) ☐
- Tier 2 charged simple bespoke activity (see charging guidance) ☐

**2d What types of regulated facilities are you applying for? (For two or more facility types.)**

**Regulated Facility 1**



National grid reference (12 digit)

--

Installation ☐ *Tick the relevant box in 2d1*

Waste operation ☐ *Tick the relevant box in 2d2*

Mining waste operation ☐ *Tick the relevant box in 2d3*

Water discharge activity (all) ☐ *Go to section 3d*

Medium Combustion Plant only ☐ *Tick the relevant box in 2d4*

Medium Combustion Plant/ Specified Generator combined ☐ *Tick the relevant box in 2d4*

Specified Generator only ☐ *Tick the relevant box in 2d4*

**2d1 Installation**

**2d2 Waste Operation**

Intensive farming installation ☐ Landfill gas facility (closed landfill) ☐

Local authority (Part A (2) and Part B) ☐ Opra charged activity ☐

Low impact installation (see question 2e below) ☐ Tier 2 charged bespoke activity (see charging guidance for list) ☐

Opra charged activity ☐ Pet cemetery ☐

Directly associated activity ☐

Paragraph-17 installation ☐

**2d3 Mining waste operation**

**2d4 Medium Combustion Plant/Specified Generator**

Non-Opra charged activity ☐ Tier 2 charged complex bespoke activity (see charging guidance) ☐

Opra charged activity ☐ Tier 2 charged simple bespoke activity (see charging guidance) ☐

**Regulated Facility 2**

National grid reference (12 digit)

--

Installation ☐ *Tick the relevant box in 2d1*

Waste operation ☐ *Tick the relevant box in 2d2*

Mining waste operation ☐ *Tick the relevant box in 2d3*

Water discharge activity (all) ☐ *Go to section 3d*

Medium Combustion Plant only ☐ *Tick the relevant box in 2d4*

Medium Combustion Plant/Specified Generator combined ☐ *Tick the relevant box in 2d4*

Specified Generator only ☐ *Tick the relevant box in 2d4*

**2d1 Installation**

**2d2 Waste Operation**

Intensive farming installation ☐ Landfill gas facility (closed landfill) ☐

Local authority (Part A (2) and Part B) ☐ Opra charged activity ☐

Low impact installation (see question 2e below) ☐ Tier 2 charged bespoke activity (see charging guidance for list) ☐

- Opra charged activity ☐ Pet cemetery ☐
- Directly associated activity ☐
- Paragraph-17 installation ☐

### 2d3 Mining waste operation

Non-Opra charged activity

☐

### 2d4 Medium Combustion Plant/Specified Generator

Tier 2 charged complex bespoke activity (see charging guidance)

☐

Opra charged activity

☐

Tier 2 charged simple bespoke activity (see charging guidance)

☐

### Regulated Facility 3 etc.

Do you want three or more facilities?

No ☒ Go to section 2e

Yes ☐ Use a separate sheet and send it to us with your application form. Tell us below the reference you have given this separate sheet.

Document reference

Go to section 2e

### 2e Low impact installations (installations only)

Are any of the regulated facilities low impact installations?

No ☒ Go to section 2f

Yes ☐

Please give us a description of your proposed activity telling us how you meet the conditions for a low impact installation and send it to us with your application form.

Document reference

Tick the box to confirm you have filled in the low impact installation checklist in Appendix 1 for each regulated facility.

☐

### 2f Treating batteries

Are you planning to treat batteries? (See the guidance notes on part B2.)

No ☒

Yes ☐ Tell us how you will do this, send us a copy of your explanation and tell us the reference you have given this explanation.

Document reference

### 2g Multi-operator installation

If the site is a multi-operator site (that is there is more than one operator of the installation) then fill in the table below the application reference for each of the other permits.

**Table 1 – Other permit application references**

--

### 3 Your ability as an operator

If you are only applying for a water discharge activity, you only have to fill in question 3d.

**3a Relevant offences – installations, waste operations, medium combustion plant and specified generators** (See the guidance notes on part B2)

Have you, or any other relevant person, been convicted of any relevant offence?

No ☒ Go to section 3b

Yes ☐ Please give details below

Title	<input type="text"/>
First name	<input type="text"/>
Last name	<input type="text"/>
Date of birth (DD/MM/YYYY)	<input type="text"/>
Position held at the time of the offence	<input type="text"/>
Name of the court where the case was dealt with	<input type="text"/>
Date of conviction (DD/MM/YYYY)	<input type="text"/>
Offence and penalty set	<input type="text"/>
Date any appeal against the conviction will be heard (DD/MM/YYYY)	<input type="text"/>

If necessary, use a separate sheet to give us details of other relevant offences, and tell us below the reference number you have given the extra sheet.

Document reference

**3b Technical ability - relevant waste operations only** (See the guidance notes on part B2)

**3b1** Which approved scheme are you using to show you have the suitable technical skills and knowledge to manage your facility?

CIWM / WAMITAB ☒

ESA / EU ☐

**3b2** Do you already hold the relevant, formal qualifications to manage your facility?

Yes ☐ Tick to confirm you've included all original and continuing competence evidence. ☐

No ☒ Tick to confirm you've included evidence you've registered with a Scheme. ☒

**3c Finances (installations, waste operations, medium combustion plant, specified generators and mining waste operations only)**

Do you or any relevant person have current or past bankruptcy or insolvency proceedings against you?

No ☒ Go to section 3d.

Yes ☐ Please give details below of the required set-up costs (including infrastructure), maintenance and clean up costs for the proposed facility against which a credit check may be assessed.

Please note: We may want to contact a credit reference agency for a report about your business's finances.

**Landfill, Category A mining waste facilities and mining waste facilities for hazardous waste only**

How do you plan to make financial provision (to operate a landfill or a mining waste facility you need to show us that you are financially capable of meeting the obligations of closure and aftercare)?

- |                |                          |
|----------------|--------------------------|
| Bonds          | <input type="checkbox"/> |
| Escrow account | <input type="checkbox"/> |
| Trust fund     | <input type="checkbox"/> |
| Lump sum       | <input type="checkbox"/> |
| Other          | <input type="checkbox"/> |

Provide a plan of your estimated expenditure on each phase of the landfill or mining waste facility.

Document reference

**3d Management systems (all)**

You can find guidance on management systems in our 'How to Comply' document. We have also developed environmental management toolkits for some business sectors which you can use to produce your own management system. You can get this by calling 0300 065 3000 or by downloading it from our guidance webpages.

**3d1** Does your management system meet the conditions set out in our guidance?

Yes ☒

No ☐

**3d2** What management system will you provide for your regulated facility?

- |   |                                     |
|---|-------------------------------------|
| EC Eco-Management and Audit Scheme (EMAS) | <input type="checkbox"/>            |
| ISO 14001                                 | <input type="checkbox"/>            |
| BS 8555 (Phases 1–5)                      | <input type="checkbox"/>            |
| Green Dragon                              | <input type="checkbox"/>            |
| Own management system                     | <input checked="" type="checkbox"/> |

**3d3** Make sure you included a summary of your environment management system with the application. Tick the box to conform you've done this and tell us the document reference, below.



Document reference

Application report, Appendix 5 Environmental Management System (EMS)

**Water discharge activities:** Go to section 5.

**4 Consultation (fill in 4a to 4c for installations and waste operations and 4d for installations only. Fill in 4e for medium combustion plant and specified generators only)**

Could the waste operation or installation involve releasing any substance into any of the following?

#### 4a A sewer managed by a sewerage undertaker

No ☒

Yes ☐ Please name the sewerage undertaker

#### 4b A harbour managed by a harbour authority

No ☒

Yes ☐ Please name the harbour authority

#### 4c Direct into relevant territorial waters or coastal waters within the sea fisheries district of a local fisheries

No ☒

Yes ☐ Please name the fisheries committee

#### 4d Is the installation on a site for which:

**4d1** a nuclear site licence is needed under section 1 of the Nuclear Installations Act 1965?

No ☐

Yes ☐

**4d2** a policy document for preventing major accidents is needed under regulation 5 of the Control of Major Accident Hazards?

No ☐

Yes ☐

#### 4e Is the medium combustion plant or specified generator located within an Air Quality Management Area (AQMA)?

No ☐

Yes ☐ What is the name of the AQMA?

What is the name of the Local Authority?

### 5 Supporting information

#### 5a Provide a plan or plans for the site (but not mobile plant)

Mark the site boundary in green (See guidance notes on part B2 for more information on what should be included)

Document reference

21/012h 001 Permit Boundary.

#### 5b Provide the relevant sections of a site condition/baseline report, if this applies

Document reference

Appendix 3 Site Condition Report.

If you are applying for an installation, tick the box to confirm that you have sent in a baseline report.

☐

#### 5c Provide a non-technical summary of your application (see the guidance notes on part B2)

Document reference

Application Report, Section 5, Non-technical Summary.

### 6 Environmental risk assessment

Provide an assessment of the risks each of your proposed regulated facilities poses to the environment. The risk assessment must use H1 or an equivalent method.

**Appendix 1 – Low impact installation checklist** (see guidance notes on part B2)

Installation reference				
Condition	Response			Do you meet this?
A – Management techniques	Provide references to show how your application meets A.			Yes <input type="checkbox"/>
	References			No <input type="checkbox"/>
B – Aqueous waste	Effluent created	m3/day		Yes <input type="checkbox"/>
				No <input type="checkbox"/>
C – Abatement systems	Provide references to show how your application meets C.			Yes <input type="checkbox"/>
	References			No <input type="checkbox"/>
D - Groundwater	Do you plan to release any hazardous substances or non-hazardous pollutants into the ground?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>
		No <input type="checkbox"/>		No <input type="checkbox"/>
E – Producing waste	Hazardous waste	Tonnes per year		Yes <input type="checkbox"/>
	Non-hazardous waste	Tonnes per year		No <input type="checkbox"/>
F – Using energy	Peak energy consumption	MW		Yes <input type="checkbox"/>
				No <input type="checkbox"/>
G – Preventing accidents	Do you have appropriate measures to prevent spills and major releases of liquids? (See 'How to comply'.)	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>
	Provide references to show how your application meets G.			No <input type="checkbox"/>
	Reference			
H - Noise	Provide references to show how your application meets H.			Yes <input type="checkbox"/>
	Reference			No <input type="checkbox"/>
I - Emissions of polluting substances	Provide references to show how your application meets I.			Yes <input type="checkbox"/>
	Reference			No <input type="checkbox"/>
J – Odours	Provide references to show how your application meets J.			Yes <input type="checkbox"/>
	Reference			No <input type="checkbox"/>
K – History of keeping to the regulations	Say here whether you have been involved in any enforcement action as described in Compliance History Appendix 1 explanatory notes.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	



**Application form**

Part B4

# Application for an environmental permit:

## Part B4 – New bespoke waste operation permit

<p><b>Fill in this part of the form, together with parts A, B2 and F1, if you are applying for a new bespoke permit for a waste operation.</b></p> <p>Please check that this is the latest version of the form available from our website.</p> <p>Please read through this form and the guidance notes that came with it. All relevant guidance documents can be found on our website.</p>	<p><b>Contents</b></p> <p>1 About your activities</p> <p>2 Emissions to air, water and land</p> <p>3 Operating techniques</p> <p>4 Monitoring</p> <p>Appendix 1 – Specific questions for waste facilities that accept clinical waste</p> <p>Appendix 2 – Specific questions for waste facilities that accept hazardous waste</p> <p>Appendix 3 – Specific questions for the recovery to land for agricultural benefit of compost like outputs from the treatment of mixed municipal solid wastes</p> <p>Appendix 4 – Specific questions for inert landfill</p>
--	--

### 1 About your activities

#### 1a Tell us about the activities you want to do

Fill in Table 1a below with details of the waste activities (operations) you are applying for.

Fill in a separate table for each waste operation you are applying for. Use a separate sheet if you have a long list and send it to us with your application form.

Tell us the document reference.

Document reference

n/a

#### Notes to help you complete Table 1a:

**1** This is the type of activity you want to do. For example, household, commercial and industrial waste transfer or in-vessel composting.

**2** Use the description from the guidance. Include any extra detail that you think would help to accurately describe what you want to do.

**3** The R (recovery) and D (disposal) codes are as set out in Annex I and/or Annex II of the European Waste Framework Directive (as amended).

**4** By 'capacity', we mean:

- the total landfill capacity (cubic metres) for landfills
- the total treatment capacity (tonnes each day) for waste treatment
- the total storage capacity (tonnes) for waste storage operations.

**5** By 'total storage capacity', we mean the maximum amount of waste, in tonnes, you are able to store on the site at any one time.





Table 1a – Waste operations which do not form part of an installation				
Waste operation name (See note 1)	Description of the waste operation (See note 2)	Annex I or Annex II (disposal and recovery) codes (See note 3)	Hazardous waste treatment capacity (if this applies). (See note 4)	Non-hazardous waste treatment capacity (if this applies). (See note 4)
Clinical Waste Transfer Station	Storage and transfer of non-haz waste	D15 Storage pending any of the operations numbered D1 to D14.  R13 Storage of wastes pending the operations numbered R3 and R5.  R5 Recycling / reclamation of other inorganic materials		
<b>For all waste operations</b>	Total storage capacity of non-hazardous waste (see note 5)	Total storage capacity of hazardous waste (see note 5)		Total annual throughput (tonnes each year)

	50	n/a	1,000
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### 1b What waste types do you want to accept?

For each line in Table 1a, fill in a separate document to list those types of waste you will accept onto site for that activity. Give the List of Wastes catalogue code and description.

If you need to exclude wastes from your activity or facility by restricting the description, quantity, physical nature, hazardous properties, composition or characteristic of the waste, include these in the document. Send it to us with your application form.

If you want to accept any waste with a code ending in 99, you must provide more information and a full description in the document.

You can use Table 1b as a template. Please provide the reference for each document.

Document references

See application report, section 3, table 3.1

Table 1b – Template example: types of waste accepted and restrictions	
Waste code	Description of waste
Example	Example
02 01 08*	Agrochemical waste containing dangerous substances
06 01 02*	Hydrochloric acid

### 1c Deposit for recovery purposes (see guidance notes on part B4)

**1c1** Are you applying for a waste recovery activity involving the permanent deposit of waste in or on land, for construction, restoration or land reclamation?

No ☒ *Go to section 2*

Yes ☐

**1c2** Have we confirmed that we believe the activity is waste recovery?

No ☐ *We recommend you confirm the activity is recovery with us, before you apply.*

Yes ☐

**1c3** Have there been any changes to your proposal since the pre-application discussion?

No ☐

Yes ☐ *We recommend you confirm the effect of changes with us, before you apply.*

**1c4** Please send us a copy of your waste recovery plan that complies with the guidance on waste recovery plans and permits. You can access this guidance via the guidance pages of our website.

Document reference

## 2 Emissions to air, water and land

Fill in Table 2 below with details of the emissions that result from the operating techniques at each of your waste operations (activities).

Fill in one table for each waste operation (activity). You can use Table 2 as a template. Please provide the reference for each document.

Document reference

Table 2 – Emissions (releases)				
Waste operation name		Washroom transfer station		
Point source emissions to air				
Emission point reference and location	Source	Parameter	Quantity Unit	Unit
n/a				
Point source emissions to water (other than sewers)				
Emission point reference and location	Source	Parameter	Quantity Unit	Unit
n/a				
Point source emissions to sewers, effluent treatment plants or other transfers off site				
Emission point reference and location	Source	Parameter	Quantity Unit	Unit
n/a				
Point source emissions to land				
Emission point reference and location	Source	Parameter	Quantity Unit	Unit
n/a				

### 3 Operating techniques

#### 3a Technical standards

Fill in Table 3a for each operation you refer to in Table 1a above, and list the relevant technical guidance note (TGN) or notes you are planning to use. If you are planning to use the standards set out in the TGN, there is no need to justify using them.

You must justify your decisions in a separate document if:

- there is no technical standard;
- the technical guidance provides a choice of standards; or
- you plan to use another standard.

This justification could include a reference to the Environmental Risk Assessment provided in section 6 of part B2 of the application form.

The documents in Table 3a should summarise the main measures you use to control the main issues identified in the H1 assessment or technical guidance.

For each of the activities listed in Table 3a, describe the type of operation and the options you have chosen for controlling emissions from your process.

Fill in one table for each waste operation (activity). You can use Table 3a as a template. Please provide the reference for each document.

Document reference

Table 3a – Technical standards		
Waste operation name	Clinical Waste Transfer Station	
Description of waste operation	Relevant technical guidance note. You will need to refer to 'How to comply' for all permits.	Document reference (if appropriate)
	'How to comply'	
Store & transfer of non-haz waste.	EMS	
	How to comply with your environmental permit	

If appropriate, use block diagrams to help describe the operation and process. Give the document references you use for each diagram and description.

Document reference

See application report, section 3.

### 3b General requirements

Fill in a separate Table 3b for each waste operation (activity). You can use Table 3b as a template. Please provide the reference for each document.

Document reference

Table 3b – General requirements	
Waste operation name	
If the TGN or H1 assessment shows that emissions of substances not controlled by emission limits are an important issue, send us your plan for managing them	Document reference or references n/a
If the TGN or H1 assessment shows that odours are an important issue, send us your odour management plan	Document reference or references Appendix 2 Odour Management Plan
If the TGN or H1 assessment shows that noise or vibration are important issues, send us your noise or vibration management plan (or both)	Document reference or references n/a
If our fire prevention guidance or your H1 assessment shows that fire risk is an important issue, send us your fire management plan	Document reference or references Appendix 1 Fire Prevention Plan

### 3c Information for specific sectors

For some of the sectors, we need more information to be able to set appropriate conditions in the permit. For those activities listed below, you must answer the questions in the related Appendix.

#### Table 3c – Questions for specific sectors

Sector	Appendix
Clinical waste	See the questions in appendix 1
Hazardous and non-hazardous waste recovery and disposal	See the questions in appendix 2
Recovery to land for agricultural benefit of compost like outputs from the treatment of municipal mixed wastes	See the questions in appendix 3
Inert landfill	See the questions in appendix 4

## 4 Monitoring

### 4a Describe the measures you use to monitor emissions by referring to each emission point in Table 2 above

You should also describe any environmental monitoring. Tell us:

- how often you use these measures;
- the methods you use; and
- the procedures you follow to assess the measures.

Document reference

n/a

### 4b Point source emissions to air only

Provide an assessment of the sampling locations used to measure point source emissions to air. The assessment must use Technical Guidance Note M1 (Monitoring). This is available in the Guidance section on our Website.

Document reference

n/a

## Appendix 1 – Specific questions for the clinical waste sector

Note: If your procedures are fully in line with the standards set out in EPR 5.07 then you should tick the 'yes' box and provide the procedure reference. There is no need for you to supply a copy of the procedure.

### 1 Are pre-acceptance procedures in place that are fully in line with the appropriate measures set out in section 2.2 of EPR 5.07 and which are used to assess a waste enquiry before it is accepted at the facility?

No ☐ Provide justification for departure from EPR 5.07 and submit a copy of the procedures

Document reference

Yes ☒ Document reference See Appendix 5, EMS

### 2 Are waste acceptance procedures in place that are fully in line with the appropriate measures set out in section 2.2 of EPR 5.07, and which are used to cover issues such as loads arriving and being inspected, sampling waste, rejecting waste, and keeping records to track waste?

No ☐ Provide justification for departure from EPR 5.07 and submit a copy of the procedures

Document reference

Yes ☒ Document reference See Appendix 5, EMS

### 3 Are waste storage, handling and dispatch procedures, and infrastructure in place that are fully in line with the appropriate measures set out in section 3.2 of EPR 5.07?

No ☐ Provide justification for departure from EPR 5.07 and submit a copy of the procedures

Document reference

Yes ☒ Document reference See Appendix 5, EMS

### 4 Are monitoring procedures in place that are fully in line with the appropriate measures set out in section 3.3 of EPR 5.07?

No ☐ Provide justification for departure from EPR 5.07 and submit a copy of the procedures

Document reference

Yes ☒ Document reference See Appendix 5, EMS

### 5 Are you proposing to either

- accept an additional waste not included in Table 2.1 of section 2.1 of EPR 5.07, or
- apply a permitted activity to a waste other than that identified for that waste in Table 2.1?

No ☒

Yes ☐ You must provide justification

Document reference

### 6 Please provide a summary description of the treatment activities undertaken on the facility. This should cover the general principles set out in section 2.1.4 of EPR 5.07

Document reference

n/a no treatment taking place

### 7 Please provide layout plans detailing the location of each treatment plant and main plant items and process flow

Document reference

n/a no treatment taking place



## Appendix 2 – Specific questions for the hazardous waste recovery and disposal sector

Note: If your procedures are fully in line with the standards set out in SGN 5.06 then you should tick the 'yes' box and provide the procedure reference. There is no need for you to supply a copy of the procedure.

**1 Are pre-acceptance procedures in place that are fully in line with the appropriate measures set out in section 2.1.1 of SGN 5.06, and which are used to assess a waste enquiry before it is accepted at the facility?**

No ☐ Provide justification for departure from SGN 5.06 and submit a copy of the procedures

Document reference

Yes ☐ Document reference

**2 Are waste acceptance procedures in place that are fully in line with the appropriate measures set out in section 2.1.2 of SGN 5.06, and which are used to cover issues such as loads arriving and being inspected, sampling waste, rejecting waste, and keeping records to track waste?**

No ☐ Provide justification for departure from SGN 5.06 and submit a copy of the procedures

Document reference

Yes ☐ Document reference

**3 Are waste storage procedures and infrastructure in place that are fully in line with the appropriate measures set out in section 2.1.3 of SGN 5.06?**

No ☐ Provide justification for departure from SGN 5.06 and submit a copy of the procedures

Document reference

Yes ☐ Document reference

**4 Provide a layout plan giving details of where the facility is based, the infrastructure in place (including areas and structures for separately storing types of waste which may be dangerous to store together) and capacity of waste storage areas and structures**

Document reference

**5 Provide a summary of the treatment activities carried out on the facility. This should cover the general principles set out in section 2.1.4 of SGN 5.06 and the specific principles set out in sections 2.1.5 to 2.1.15 as appropriate of SGN 5.06**

Document reference

**6 Provide layout plans giving details of where each treatment plant is based, the main items at each plant, and process flow diagrams for the treatment plant**

Document reference or references

### Appendix 3 – Specific questions for the recovery to land for agricultural benefit of compost like outputs from the treatment of mixed municipal solid wastes

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**1 Provide an accurate and reliable characterisation of your compost like outputs (CLO). This should be based on sampling and analysis of the CLO produced by the mechanical, biological treatment (MBT) process over a 12 month period and in accordance with section 2 of TGN 6.15**

Document reference

**2 Provide an agricultural benefit assessment for the use of your CLO. This should be based on section 2 of TGN 6.15 and should be signed and dated by an appropriate technical expert**

Document reference

**3 Provide a site specific risk assessment of risks to soil and food chain receptors. This should be based on Schedule 2 of TGN 6.15 and include a map with a green outline showing the boundary of the area being treated and include:**

- locations where the waste will be stored and spread;
- any spring, well or borehole used to supply water for domestic or food production purposes that is within 250 metres of the area being treated;
- any spring, well or borehole not being used for domestic or food production purposes that is within 50 metres of the area being treated;
- any European designated sites (candidate or Special Area of Conservation, proposed or Special Protections Area in England and Wales or Ramsar Site) or Sites of Special Scientific Interest (SSSI) which are within 500 metres of the place where waste is to be stored or spread;
- the location of public rights of way;
- any Groundwater Source Protection Zones;
- surface watercourses;
- any buildings or houses within 250 metres of the area being treated;
- land drains within the boundary.

Document reference

**4 Are the technical standards and measures fully in line with those set out in section 3 of TGN 6.15?**

Yes ☐

No ☐ Provide justification for departure from TGN 6.15 and a copy of the proposed technical standards, measures or procedures.

Document reference

## Appendix 4 – Specific questions for inert landfills

---

### 1 Provide your Environmental Setting and Installation Design (ESID) report

Document reference

### 2 Have you completed a hydrogeological risk assessment (HRA) for the site?

No ☐

Yes ☐ Document reference

Note: For inert landfills, this is only necessary in certain cases. Refer to our guidance 'Environmental Permitting Regulations: Inert Waste Guidance, Standards and Measures for the Deposit of Inert Waste on Land'. This can be downloaded from our guidance webpages.

### 3 Provide your stability risk assessment (SRA) for the site

Document reference

### 4 Have you completed a landfill gas risk assessment (LFGRA) for the site?

No ☐

Yes ☐ Document reference

Note: For inert landfills, this is only necessary in certain cases. Refer to guidance 'Environmental Permitting Regulations: Inert Waste Guidance, Standards and Measures for the Deposit of Inert Waste on Land'. This can be downloaded from our guidance webpages.

Templates for these four reports can be found using the links on our Guidance Webpages.

### 5 Provide your proposed plan for closing the site and your procedures for looking after the site once it has closed

Document reference



**Application Form**

Part F1

# Application for an environmental permit:

## Part F1 – Opra, charges and declarations

**Fill in this part for all applications for installations, waste operations, mining waste operations and groundwater discharges onto land.**

Please check that this is the latest version of the form available from our website.

**For applications for water discharge and point source groundwater discharge activities you need to fill in part F2 instead.**

Please read through this form and the guidance notes that

came with it. All relevant guidance documents can be found on our website.

### Contents

- 1 Working out charges
- 2 Opra profile (electronic)
- 3 Payment
- 4 The Data Protection Act 1998
- 5 Confidentiality and national security
- 6 Application checklist
- 7 Declaration

## 1 Working out charges (you must fill in this section)

You have to submit an application fee with your application. You can find out the charge by looking at our current environmental permitting charging scheme. This can be found on our 'How we regulate you' webpages. Please remember that the charges are revised on 1 April each year and that there is an annual subsistence charge (for site based permis) to cover the costs we incur in the ongoing regulation of the permit.

**Examples:** We have included examples to help you complete the table. The Tier 2 charge example is for an application for a 'New standard rule' permit. The Tier 3 charge example is for an installation Opra based charge for a normal variation (multiplier) application.

Note: for Opra charged Tier 3 Facilities you also need to complete an Opra profile (see section 2).

**Table 1 – Working out charges**

Type of application	Bespoke permit			
	Summary of charges			
<b>Tier 2 facilities</b> (including Part A(2) and Part B)	Charge identifier	Number of facilities	Charge for each facility (£)	Charges due (£)
<b>EXAMPLE:</b> SR2010 No12	S060A (W)	1	1,630.00	1,630.00
<b>Tier 3 facilities</b>				
<b>EXAMPLE:</b> Total Opra charging score for installations	90	× charge multiplier	57	5,130.00
Total Opra charging score for installations		× charge multiplier		
Total Opra charging score for waste operations	60	× charge multiplier	60	£10,500
Total Opra charging score for mining waste facilities				
Other charges (such as one-off assessments or fixed charge applications etc.)				
<b>Total charges due</b>				<b>£10,500</b>

---

## 2 Opra profile (does not apply to standard facilities, or other tier 2 permit applications)

If you are submitting a bespoke application, you must include a completed electronic copy in Excel of the *current* Opra spreadsheet. You can find the current Opra spreadsheet in the 'Our charges' section on our 'How we regulate you' webpages.

**For all variations, full and partial surrenders:** you will need to submit a copy of your current Opra profile based on your existing profile, not a new profile following the variation or surrender.

**For transfers:** you will need to submit a revised Opra profile to include your own operator performance. Note: this will not change the set transfer fee.

**Important:** your Opra profile (score) must match our records. If you are unsure about your current Opra profile (score), you should talk to your regulatory officer before submitting your application.

Tick this box to confirm that you have included the electronic OPRA spreadsheet



## 3 Payment

### 3a How do you want to pay?

Tick an option below to show how you will pay.

- |   |                                     |                         |
|---|-------------------------------------|-------------------------|
| Electronic transfer (for example, BACS) | <input checked="" type="checkbox"/> | <i>Go to section 3b</i> |
| Credit or Debit card                    | <input type="checkbox"/>            | <i>Go to section 3c</i> |
| Cheque                                  | <input type="checkbox"/>            | <i>Go to section 3d</i> |
| Postal order                            | <input type="checkbox"/>            | <i>Go to section 3d</i> |

### 3b Paying by electronic transfer

If you choose to pay by electronic transfer use the following information to make your payment.

Company name: Natural Resources Wales

Company address: Income Dept., PO BOX 663, Cardiff, CF24 0TP

Bank: RBS

Address: National Westminster Bank Plc, 2 ½ Devonshire Square, London, EC2M 4BA

Sort code: 60-70-80

Account number: 10014438

#### Reference number

You can use any reference number but we prefer the number to be 'EPR' followed by the first nine letters of your organisation name followed by a four-digit number.

For example, for a company named Joe Bloggs Ltd, the reference number might be EPRJOEBLOGGS0001. (Remember you can use any four-digit number at the end.)

The reference number you will provide will appear on our bank statements so we can check your payment. We may need to contact your bank to make sure the reference number is quoted correctly.

You should also email your payment details and payment reference number to [banking.team@naturalresourceswales.gov.uk](mailto:banking.team@naturalresourceswales.gov.uk) / [banking.team@cyfoethnaturiolcymru.gov.uk](mailto:banking.team@cyfoethnaturiolcymru.gov.uk) or fax it to 0300 065 3001 and enter it in the space provided below.

BACS reference

EPRELISUKLTD0001

Amount paid

£10,500

### Making payments from outside the UK

These details have changed. If you are making your payment from outside the United Kingdom (which must be received in sterling), our IBAN number is GB70 NWBK6070 8010 0144 38 and our SWIFT/BIC number is NWBKGB2L.

If you do not quote your payment reference number, there may be a delay in processing your payment and application.

### 3c Paying by credit or debit card

If you are paying by credit or debit card, please fill in the separate form CC1.

You can download this from our website or you can ask for one of our customer service providers to send one by post. We will destroy your card details once we have processed your payment. We can accept payments by Visa, MasterCard or Maestro UK card only.

### 3d Paying by cheque or postal order

You should make cheques or postal orders payable to Natural Resources Wales and they should be marked 'A/c Payee'.

We will not accept post-dated cheques (cheques with a future date written on them).

Cheque/ postal order number

Amount paid

## 4 The Data Protection Act 1998 and General Data Protection Regulations

We, the Natural Resources Body for Wales (hereafter "Natural Resources Wales"), will process the information you provide so that we can:

- deal with your application;
- make sure you keep to the conditions of the licence, permit or registration;
- process renewals; and
- keep the public registers up to date.

We may also process or release the information to:

- offer you documents or services relating to environmental matters;
- consult the public, public organisations and other organisations (for example, the Health and Safety Executive, local authorities, the emergency services, the Department for Environment, Food and Rural Affairs) on environmental issues;
- carry out research and development work on environmental issues;
- provide information from the public register to anyone who asks;
- prevent anyone from breaking environmental law, investigate cases where environmental law may have been broken, and take any action that is needed;
- assess whether customers are satisfied with our service, and to improve our service; and
- respond to requests for information under the Freedom of Information Act 2000 and the Environmental Information Regulations 2004 (if the Data Protection Act allows). We may pass the information on to our agents or representatives to do these things for us.

## 5 Confidentiality and national security

We will normally put all the information in your application on a public register of environmental information. However, we may not include certain information in the public register if this is in the interests of national security, or because the information is confidential

### Confidentiality

You can ask for information to be made confidential by enclosing a letter with your application giving your reasons. If we agree with your request, we will tell you and not include the information in the public register. If we do not agree with your request, we will let you know how to appeal against our decision, or you can withdraw your application.

**Only tick the box below if you wish to claim confidentiality for your application.**

Please treat the information in my application as confidential

☐

Tick the box to confirm you have provided evidence to support your confidentiality claim and give us the document reference, below.

☐

Document reference

### National security

You can tell the Welsh Ministers that you believe including information on a public register would not be in the interests of national security.

You must enclose a letter with your application telling us that you have told the Welsh Ministers and you must still include the information in your application. We will not include the information in the public register unless the Welsh Ministers decides that it should be included.

You can find guidance on national security in 'Core Environmental Permitting Guidance' published by Defra and available via the .Gov website.

**You cannot apply for national security via this application.**

## 6 Application checklist (you must fill in this section)

Tell us about the supporting evidence and information you have sent with this application.

**Application fee** - You must submit the correct application fee in line with our current charging scheme.

Tick the box to say you have included the correct fee.

☒

List all the documents you have included in Table 2. Please see the guidance notes for examples on how to complete the checklist.

**If the relevant information for a question forms part of a larger document, please specify the relevant section(s) of the document.** This will speed up the process of checking your application and making decisions.

If necessary, continue on a separate sheet and tell us the reference you have given the document below.

Document reference

Table 2 – application checklist		
Question reference	Document title/ reference	Document section
Part B2 - Q3d3	Environmental Management System Summary	See Application report, section 6
Part B2 – Q5a	Site Plan	See permit boundary plan 21/012d 001b
Part B2 – Q5b	Site Condition Report	See, Appendix 3 Site Condition Report
Part B2 – Q5c	Non-technical Summary	See, Application Report, section 5
Part B2 – Q3b1	WAMITAB evidence	See, Appendix 6
Part B2 – Q6	Environmental Risk Assessment	See, Appendix 4
Part B4 – Q1b	List of waste codes	See, Application Report, section 3
Part B4 – Q3b	Odour Management Plan	See, Appendix 2
Part B4 – Q3b	Fire Prevention Plan	See, Appendix 1

## 7 Declaration

**You must read this section before making the declaration and sending your form to us.**

**For transfer applications - Both you and the person receiving the permit must make the declaration.**

Section 7d must be completed by the current holder *and* Section 7e must be completed by the proposed new holder.

A relevant person should make the declaration. You must be a relevant person or have the authority of a relevant person to sign this application on their behalf.



Relevant people means each applicant, and in the case of a company, a director, manager, company secretary or any similar officer or employee listed on current appointments in Companies House. In the case of a Limited Liability Partnership (LLP), it includes any partner. If the permit holder is an organisation of individuals, each individual (or individual trustee) must complete the declaration.

To simplify and speed up the application process we recommend that the declaration is filled in by an officer of a company or one of the partners in a Limited Liability Partnership (LLP).

If you wish a manager, employee or consultant etc. to sign the declaration on behalf of a relevant person, we will need written confirmation from a relevant person; that is, an officer of the company, a partner in the LLP or the individual, confirming that the person has the authority to fill in the declaration.

If you are joint permit holders you should each fill in your own declaration. We have provided extra spaces for this below. Please send in a separate sheet with your application if you need more room for signatories.

Where the operator is the subject of any insolvency procedure, the declaration must be filled in by the official receiver/appointed insolvency practitioner.

#### **7a Are you signing the form on *behalf* of a relevant person?**

If you are *not* a relevant person, but want to sign the application on their behalf, you must include confirmation that you can do this.

I have included written confirmation from a relevant person to confirm I can sign on their behalf. ☐

#### **7b Does your application include a standard facility?**

If your application includes a standard facility, you also need to confirm that you are able to meet all relevant criteria of the standard rule set/sets for which you are applying.

I confirm that my standard facility will fully meet the rules that I have applied for. ☐

#### **7c Does your application include ecological survey information?**

If your application includes ecological survey information, please see the guidance notes on part F1 and tick the box below to confirm that you have no issue with us using information from any ecological survey you have supplied with your application.

I confirm I am happy for the ecological survey information I have supplied to be used as set out in the guidance. ☐

#### **7d Declaration**

**If you're transferring the permit, the current holder or holders should sign this section of the declaration, and the proposed new holder or holders of the permit should sign the declaration in section 7e.**

If you knowingly or recklessly make a statement which is false or misleading to help you get an environmental permit (for yourself or another person), you are committing an offence under the Environmental Permitting (England and Wales) Regulations 2016.

**I declare that the information in this application is true to the best of my knowledge and belief. I understand that this application may be refused or approval withdrawn if I give false or incomplete information.**

**I understand that if I knowingly or recklessly make a false or misleading statement:**

- **I may be prosecuted; and**
- **if convicted, I may have to pay a fine and/or go to prison.**

By signing below, you are confirming that you understand and agree with the declaration above.

Title	Mr	
First name	Werner	
Last name	Dreyer	
On behalf of (if relevant)	Elis UK Ltd	

Today's date

27/02/2023

If you knowingly or recklessly make a statement which is false or misleading to help you get an environmental permit (for yourself or another person), you are committing an offence under the Environmental Permitting (England and Wales) Regulations 2016.

**I declare that the information in this application is true to the best of my knowledge and belief. I understand that this application may be refused or approval withdrawn if I give false or incomplete information.**

**I understand that if I knowingly or recklessly make a false or misleading statement:**

- **I may be prosecuted; and**
- **if convicted, I may have to pay a fine and/or go to prison.**

By signing below, you are confirming that you understand and agree with the declaration above.

Title

First name

Last name

On behalf of (if relevant)

Today's date

#### **7e Declaration for the person or persons *receiving* the permit (transfers only)**

The persons 'receiving the permit' is the proposed new permit holder.

Note: If you cannot trace a person or persons holding the permit you may be able to transfer the permit without their declaration (in section 7d above). Please contact us to discuss this and supply evidence in your application to confirm you are unable to trace one or all of the permit holders.

If you knowingly or recklessly make a statement which is false or misleading to help you get an environmental permit (for yourself or another person), you are committing an offence under the Environmental Permitting (England and Wales) Regulations 2016.

**I declare that the information in this application is true to the best of my knowledge and belief. I understand that this application may be refused or approval withdrawn if I give false or incomplete information.**

**I understand that if I knowingly or recklessly make a false or misleading statement:**

- **I may be prosecuted; and**
- **if convicted, I may have to pay a fine and/or go to prison.**

By signing below, you are confirming that you understand and agree with the declaration above.

Title

First name

Last name

On behalf of (if relevant)

Today's date

If you knowingly or recklessly make a statement which is false or misleading to help you get an environmental permit (for yourself or another person), you are committing an offence under the Environmental Permitting (England and Wales) Regulations 2016.

**I declare that the information in this application is true to the best of my knowledge and belief. I understand that this application may be refused or approval withdrawn if I give false or incomplete information.**

**I understand that if I knowingly or recklessly make a false or misleading statement:**

- **I may be prosecuted; and**
- **if convicted, I may have to pay a fine and/or go to prison.**

By signing below, you are confirming that you understand and agree with the declaration above.

Title	<input type="text"/>	<input type="text"/>
First name	<input type="text"/>	
Last name	<input type="text"/>	
On behalf of (if relevant)	<input type="text"/>	
Today's date	<input type="text"/>	



## **Appendix 1**

### Fire Prevention & Mitigation Plan



## Fire Prevention & Mitigation Plan

Elis UK Ltd  
Bulwark Road  
Bulwark Industrial Estate,  
Chepstow,  
NP16 5QZ



PROVIDING SOLUTIONS, ENSURING COMPLIANCE

---

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**Document Control Table**

Project Reference	21/012h
Project Title	Environmental Permit Application
Document Title	Fire Prevention & Mitigation Plan, Version 1
Document Issue Date	01 March 2023
Client	Elis UK Ltd

**Change log**

Version	Changes	Produced by	Checked by	Authorised by	Date
1	Original	Lauren Raby	Tracey Westbury	Tracey Westbury	01 March 2023



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**Drawings**

- Drawing No. 21/012h 001 Permit Boundary Plan
- Drawing No. 21/012h 002 Site Layout Plan
- Drawing No. 21/012h 003 Sensitive Receptor Plan
- Drawing No. 21/012h 004 Firewater Containment Plan

**Appendices**

- Appendix 1 Inspection Checklists



## 1. Introduction

### Scope of the Fire Prevention & Mitigation Plan

- 1.1. Westbury Environmental Limited have produced this Fire Prevention & Mitigation Plan (FPMP) on behalf of Elis UK Ltd (Operator). This FPMP supports an Environmental Permit application to allow the operation of a clinical waste transfer station for the short-term storage of small quantities of non-hazardous waste.
- 1.2. This FPMP assesses the risk associated with the storage of waste within the permitted area (Site) see Drawing No. 21/012h 002 Site Layout Plan.
- 1.3. This FPMP has been prepared in accordance with NRW's Fire Prevention & Mitigation Guidance – Waste Management (FPMP Guidance). The FPMP Guidance requires that the FPMP accounts for the fire risk from the storage or treatment of potentially combustible waste on the Site.
- 1.4. The FPMP Guidance includes the minimum appropriate measures required to ensure that fires are prevented within waste facilities.
- 1.5. This FPMP considers the risk posed by the storage of combustible waste types on the Site.

### Operator

- 1.6. The Operator's main business activity is the operation of a commercial laundry service.
- 1.7. As part of their service contracts, the Operator provides washroom supplies and removes contracted washroom waste. It is estimated that this service comprises less than 10% of their business.

### Using this Fire Prevention & Mitigation Plan

- 1.8. A copy of this FPMP must be kept in the Site office and be readily available to all members of staff.
- 1.9. This FPMP forms part of the Environmental Management System (EMS) for the Site. Procedures and forms referenced within this FPMP are included within the EMS. Completed forms (records) will be kept, as required by conditions included in the Environmental Permit.
- 1.10. The contents of the FPMP, including fire prevention measures, will be implemented on Site through procedures within the EMS. The EMS includes an Environmental Training Checklist that includes all the required training for Site staff. This checklist includes fire prevention procedures. The training undertaken by each member of staff is recorded on their own training record as part of the EMS.
- 1.11. Training on implementing fire prevention procedures will be given to staff on an annual basis by the Site Manager. New members of staff will be given training on the fire prevention procedures during their induction.
- 1.12. All staff working on Site must understand the contents of this FPMP in order to know what to do:
  - to prevent a fire occurring,
  - during a fire if one breaks out.
- 1.13. A fire drill will be completed on a six-monthly basis to test how well the FPMP works and to make sure staff understand what to do in the event of a fire on Site. The fire drill will include:
  - Checks that staff are trained on relevant procedures,
  - Fire detection,
  - Fire suppression,
  - Firewater Containment.





### **Content of this FPMP**

- 1.14. This FPMP describes how Elis UK Ltd will operate their Site in relation to the minimum requirements for fire prevention measures included within the FPMP Guidance.
- 1.15. The location of Site infrastructure, fire prevention measures and storage of waste is shown on Drawing No. 21/012h 002 Site Layout Plan.
- 1.16. There is typically a risk of fire where combustible wastes are stored. This FPMP provides information on how Elis UK Ltd will reduce the risk of an outbreak of fire and the potential impact that a fire may have.
- 1.17. This FPMP accounts for 6 tonnes of waste to be stored on the Site at any one time. This is due to the fact that at present the operator only has infrastructure to store this amount. The operator has plans to expand the storage infrastructure in the future. We are unable to prepare the FPMP at this time for the infrastructure that will allow 50 tonne storage limits as the details of this are unknown at this time.
- 1.18. Below is a breakdown of the information that is included within each Section of this FPMP:
  - Section 4 of this FPMP provides information relating to managing fire risk from the storage of combustible waste. This section addresses self-heating resulting in self-combustion. Information provided in this section relates to how waste is stored and managed on the Site to reduce the risk of self-heating. This section includes information relating to maximum storage time, stock rotation, waste pile sizes and volumes, separation distances, containment facilities and how heat generated in waste will be managed.
  - Section 5 of this FPMP provides information on the systems that are in place to detect a fire, both during and outside of operational hours.
  - Section 6 of this FPMP provides information on the contingency measures that are to be taken during a fire. This section includes information relating to the cessation of imported waste and notifying neighbouring businesses.
  - Section 7 of this FPMP provides information on how Elis UK Ltd will suppress and fight a fire.
  - Section 8 of this FPMP provides information on the steps to be taken after a fire before the Site becomes operational. This Section includes information relating to managing firewater and contingency measures that are in place to remove any burned materials.
  - Section 9 of this FPMP provides information on when the FPMP will be reviewed, details on staff training and monitoring that takes place on Site.



## 2. Site Information

### Location

- 2.1. The Site is located on Bulwark Road, Bulwark Industrial Estate, Chepstow, NP16 5QZ, see Drawing No. 21/012h 001 Permit Boundary Plan.
- 2.2. The whole site (including the commercial laundry service within the building) extends to 0.6 hectares (Whole Site).
- 2.3. The surrounding land-uses include a commercial laundry (Whole Site) to the west, agricultural land and woodland to the north, east and south and residential dwellings to the north and south.
- 2.4. Bulwark Camp containing two historic monuments (the Bulwarks and St Peters Cave) is approximately 40m south of the Site.
- 2.5. The nearest residential housing is located approximately 95m southwest of the Site on Alpha Road.
- 2.6. Chepstow trainline passes approximately 35m east of the Site.
- 2.7. The Site is located on a Principal designated bedrock aquifer. The British Geological Service maps do no record any superficial aquifer at this location.

### Hazards and Receptors

- 2.8. It is considered that a fire presents three main hazards to nearby sensitive receptors:
  - Heat from the fire itself
  - Air pollution (predominantly from smoke emissions)
  - Pollution to groundwater / surface water features.
- 2.9. Heat energy from a fire will reach sensitive receptors via direct fire spreading or by the deposit of burning embers. Heat energy is largely dependent upon the location and intensity of the fire; however, it is unlikely to spread more than 150m due to the lack of feedstock available in the vicinity of the Site. It is considered that burning embers are likely to extinguish when travelling over distances that exceed 150m.
- 2.10. Smoke produced from fires can contain harmful gases that are produced from the combustion process. The distance smoke will travel will be dependent upon the wind speed at the time of the fire, however it is considered unlikely that smoke from the burning of the volumes of waste stored on the Site will significantly affect sensitive receptors outside of a 1km radius.
- 2.11. Significant amounts of water and / or other chemicals may be used when controlling a fire. Firewater produced from tackling a fire has the potential to contain contaminants from the chemicals used, burned materials and other pollutants present on the site. The release of firewater from the Site as a result of a fire has the potential to cause pollution to groundwater / nearby surface water features.
- 2.12. Sensitive receptors within 1km of the Site are listed in Table 2.1: Sensitive Receptors and illustrated on the Sensitive Receptors Plan, see Drawing No. 21/012h 002.

**Table 2.1: Sensitive Receptors**

No	Receptor	Type of receptor	Direction from Site	Approx. distance from Site boundary to receptor boundary (m)
1	Broadleaved Woodland	Protected Habitat	North, east, south	0
2	Gloucester to Newport line	Trainline	East	35
3	Bulwark Camp	Historic Monument	South	40
4	River Wye (SSSI, SAC)	Protected Habitat	East	60
5	Alpha Road housing	Residential	Southwest	95
6	Ed's Auto's Car Repair	Commercial	West	100
7	Bulwark Industrial Estate	Industrial	West	100
8	Beaufort Quarry	Habitat	Northwest	105
9	Ancient Woodland	Protected Habitat	Northwest	135
10	Pennsylvania Fields (SSSI)	Protected Habitat	East	185
11	Mill Lane Industrial Estate	Industrial	North	200
12	Marten Road housing	Residential	Northwest	230
13	Bulwark Road	Public highway	West	350
14	St Christopher's	Church	Southwest	375
15	Pembroke Primary School	School	West	395
16	Allotments	Recreational	North	425
17	Warren Slade and Park	Recreational	Southeast	480
18	Chepstow Athletics Club	Recreational	West	505
19	The Brewers	Commercial	South	520
20	Bulwark Park	Recreational	Northwest	580
21	St Marys Primary School	School	Northwest	595
22	Bulwark Community Centre	Recreational	Southwest	620
23	Chepstow Cemetery	Cemetery	West	625
24	Bridget Drive	Residential	Northeast	675
25	Thornwell Primary School	School	South	675
26	Chepstow Train Station	Train Station	North	775
27	A48	Public Highway	Northwest	860

- 2.13. Woodland to the north, east and south of the Site is broadleaf woodland and is not reported to be home to protected species. Immediately west of the Site is land controlled by the Operator (Whole Site).
- 2.14. The predominant wind direction blows towards receptors to the northeast of the Site. The majority of sensitive receptors are located upwind of the Site.
- 2.15. The following nearby protected habitats are designated for the following reasons:
- The River Wye, a Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) comprises of species rich saltmarshes and grassland that provides good connectivity for otters. The River Wye is home to a number of protected species including, freshwater fish such as the Atlantic salmon and European Bullhead.



- Pennsylvania fields SSSI is designated for its biological interest, being an area of brackish pastureland and overlying alluvial soils alongside the lower tidal part of the River Wye.
- Beaufort Quarry a former working quarry which was surrendered in 2006 and has undergone ecological development to become a local wildlife site.

### **Waste Operations**

2.16. Waste operations will comprise of the secure storage and transfer of select non-hazardous wastes. The non-hazardous waste will comprise of select washroom and medicine waste using the following waste codes:

- Non-infectious sharps (18 01 01, 18 02 01 and 20 01 99).
- Feminine hygiene products, nappies, and bandages (18 01 04).
- Non-hazardous medicines (18 01 09, 18 02 08 and 20 01 32).
- Other separately collected non-hazardous waste e.g., non-infectious sharps, dead animals, or vomit (20 01 99).

2.17. All waste will be collected separately and stored appropriately at the Site. Further detail on the storage is provided below.

2.18. Waste will then be transferred to a suitably licensed facility.

2.19. There will be no treatment or sorting of waste carried out on Site.

#### Sanitary waste

2.20. Sanitary waste will be collected in bags from multiple washrooms and placed into a larger bag for transit.

2.21. Upon arrival at the Site, the double-bagged waste will be placed into an enclosed, lockable bin (triple containment).

2.22. Washroom sanitary waste will be stored for no longer than 1 month.

2.23. This waste will subsequently be collected and taken to a suitably licenced facility.

#### Medicine waste

2.24. Medicine waste will be collected in 'blue stream' pharmaceutical waste bins. It is considered that the medicine waste will consist of blister packs and non-hazardous domestic over-the-counter medicines which are expired, unused, damaged, or no longer needed.

2.25. The bins in which the medicine waste is collected remain sealed so no contamination or mixing of waste can occur.

2.26. Upon arrival at the Site the smaller sealed bins are collectively stored in secure larger storage containers.

#### Sharps

2.27. Sharps waste will be collected in sealed, sharps bins. The bins in which the sharps are collected remain sealed after acceptance to Site, so no contamination or mixing of waste can occur. Upon arrival to the Site, these smaller secure bins will be collectively stored in secure metal cages or bins.

2.28. Sharps accepted onto Site are collected from commercial properties and are non-infectious, including but not limited to:

- Stanley knives,
- Sewing needles,
- Scalpels and blades,
- Broken glass.



Ancillary waste

- 2.29. It is not expected that ancillary waste will form a significant part of the waste collected, however there will be a need to store very small quantities of ad-hoc waste which arise from washrooms.
- 2.30. The source of the ad-hoc waste could be dead rodents which have found their way into washrooms and this type of waste will be incidental. There will be a separate sealed bin for incidental waste to be stored on Site. As for the sanitary waste, this waste will be collected separately and will be double bagged.



### 3. Management of Potential Causes of Fire

- 3.1. It is important to identify potential causes of fire on the Site to reduce the likelihood of fires. The FPMP sets out common potential causes of fire. Information on if, and how, these potential causes of fire apply to the Site is included in Table 3.1 below.

**Table 3.1: Potential causes of fire**

Potential Cause of Fire	Applicable to the Site	Comments
Arson / Vandalism	Yes	There is a risk of unauthorised access to the Site.
Visitors & Contractors	Yes	On occasion, there will be visitors or contractors at the Site.
Ignition Sources	Yes	Vehicles of staff working on the Whole Site are parked within the Site. All vehicles will be parked a minimum of 6m from combustible waste.  There are no other sources of ignition located close to the Site.
Self-combustion	Yes	There is a risk of self-combustion from waste stored on Site, due to self-heating.
Plant or equipment failure	Yes	There are no plant or equipment associated with waste treatment/storage of waste with the potential to be a source of ignition/fuel, stored on Site.  There is a potential for vehicles entering the Site to leak fuels and oils.
Discarded smoking materials	Yes	There is a risk of discarded smoking materials presenting a source of ignition.
Hot works (e.g. welding and cutting)	No	No hot works are undertaken on Site.
Industrial heaters	No	There are no industrial heaters on Site.
Plant & hot exhausts	No	There is no plant and equipment associated with waste treatment/storage of waste, stored on Site.  All plant/vehicles will be maintained a minimum of 6m from combustible waste.
Damaged or exposed electrical cables	Yes	Electricity is used to power the CCTV.
Reactions between wastes	No	Incoming waste is source-segregated and is stored on Site in separate containers, by waste type.
Hot loads deposited at the site	Yes	There is a very low risk of a 'hot load' entering the Site. Waste will be collected and moved from vehicle to waste storage container, by hand.
Build-up of loose combustible waste, dust and fluff	Yes	Build-up of loose waste and dust is possible in the event of poor management practices. Waste will arrive in sealed containers or bags and will be stored for short periods only.
'Tramp' metal	No	Waste is not treated on Site by machinery. There is a negligible risk of "tramp" metal being generated on Site or being imported.
Batteries within waste deposits	Yes	Batteries may be present in incoming waste. The risk is considered to be low as the waste will be source-segregated.
Batteries in ELVs	No	End-of-Life vehicles are not imported onto the Site.



Potential Cause of Fire	Applicable to the Site	Comments
Cylinders stored at the site	No	Bottled gas is not stored on the Site.
Leaks and spillages of oils and fuels	Yes	There is a risk of fuel / oil leaks from vehicles parked adjacent to the Site.

- 3.2. The remainder of the points in this Section describe in detail how the Operator will minimise the risks associated with the potential causes of fire that relate to this Site, as identified in Table 3.1 above.

### Site Security

- 3.3. Site security is important to reduce the likelihood of unauthorised access to the Site. Access to the Whole Site is through a security gate. The gate is locked at all times whenever the site is unattended e.g. during non-operational hours. The site is manned during operational hours.
- 3.4. CCTV is in operation to monitor key areas of the Site e.g. waste storage area. The CCTV cameras are monitored by a third-party during operational and non-operational hours. The third-party will then alert the Site managers of any security threat that arises.

### Visitors & Contractors

- 3.5. Other than for vehicle parking, it is unlikely that visitors will need access to the Site. Visitors will not be permitted access to waste storage areas.
- 3.6. Contractors working at the Site will be made aware of all of the key fire prevention and safety procedures upon arrival.

### Ignition Sources

- 3.7. Vehicles associated with staff in the Whole Site, will be parked within the Site during working hours. In accordance with the FPMP Guidance, vehicles will be parked a minimum of 6 metres away from combustible waste.
- 3.8. Naked lights can present a source of ignition. There are no industrial / space heaters or other sources of naked flame / heat source located on the Site.
- 3.9. A no smoking policy is enforced in waste storage areas to reduce the likelihood of any naked flames.
- 3.10. No hot works are carried out on Site.
- 3.11. No fuel or oil is stored on Site.

### Self-Heating and Self-Combustion

- 3.12. The FPMP Guidance states that if you are storing materials at risk of self-combustion for longer than three months then you will need to carry out additional measures including temperature monitoring within waste piles in order to reduce this risk. These materials include:
- green material, compost, wood and wood products,
  - paper and paper products,
  - general/mixed waste including residual waste, RDF and 'fines',
  - tyres (whole or processed),
  - smaller size or graded materials either stored or mixed,
  - material that has not had potential hazards removed before stacking e.g. exposed rust (which can generate heat),
  - treated materials which are not cold before storage (treatment processes can generate heat)
- 3.13. None of the above combustible wastes / materials will be stored on the Site. There is therefore no proposal to monitor temperatures within waste stored on the Site.



- 3.14. The risk of self-heating occurring within waste piles is influenced by the following:
- Waste type,
  - Particle size,
  - Storage time,
  - Volume of stockpile,
  - Ambient temperature / external conditions (including heat produced from waste operations).
- 3.15. The risk of self-heating leading to self-combustion on Site is considered to be low. This is because:
- The volumes of waste to be stored on Site are lower than the smallest pile size example within the FPMP Guidance.
  - Waste is stored in small quantities (max 11m<sup>3</sup> / 6 tonnes currently) (for the purposes of calculating tonnes, it has been conservatively assumed that each 2.2m<sup>3</sup> container averages 1 tonne weight).
  - Waste types are collected and stored in separate metal containers, reducing the mixing of waste.
  - The double bagged storage is a result of the waste collection process and is not deemed essential mitigation of fire. However, the double and triple containment (see Section 2 Waste Operations) of the waste will have the effect of providing mitigation against the interaction and mixing with other waste.
  - It is considered that the waste type most at risk from self-heating is sanitary waste, due to the waste containing plastic. Sanitary waste will be stored on Site for a maximum of 7 days. Typically, sanitary waste will be removed within 48 hours.
  - All other waste is stored for < 1 month.
  - The maximum volume of waste to be stored at any one time is 11m<sup>3</sup>. This comprises the volume of five wheeled metal storage containers. As there is no formal separation between the containers, these have been conservatively considered as a single 'pile' of waste.
  - The entire 11m<sup>3</sup> / 6 tonne 'pile' of waste will not be sanitary waste. One container will often be dedicated to sanitary waste, at 2.2m<sup>3</sup> / 1 tonne.
  - There is no treatment of waste on the Site. Waste will be formed in its largest form, therefore it is considered that particle size will not contribute to self-heating.
  - Waste is stored in such small quantities, that it is often the case that waste will arrive and leave on the same day. Waste storage times will not exceed the maximum storage times.
  - The only ignition source on Site is parked cars in the carpark. Cars will be parked 6 metres away from combustible waste.
- 3.16. In the unlikely event of a fire, the risk of fire spread is considered to be low due to waste being stored in individual storage metal bins (2.2m<sup>3</sup>/1 tonne).
- 3.17. The waste activities are akin to those allowable under a non-waste framework directive activity (NWFD3 Temporary storage of waste at a place controlled by the producer), which is deemed to be of sufficiently low risk that no permit or fire prevention plan is required.
- 3.18. The risk of self-heating is addressed in detail in Section 4 Managing Fire Risks from the Storage of Waste.

### **Plant, Equipment & Vehicles**

- 3.19. Elis UK Ltd does not operate any plant or equipment in relation to the movement or treatment of waste on Site.
- 3.20. There is a potential for vehicles entering the Site to leak fuels and oils.
- 3.21. Vehicles owned by the Operator will be maintained in line with manufacturers recommendations to reduce the risk of breakdown / malfunction, which will include any corrosion, cracks or leaks in any fuel/oil tanks.
- 3.22. Incoming waste vehicles containing 'hot loads' have the potential to spread fire to other waste types stored on the Site. In extreme circumstances, 'hot loads' may result in the carrying vehicle catching





fire. In the unlikely event of waste that waste entering the Site would be on fire, the 'hot load' will be immediately directed to the Waste Quarantine Area.

### **Electricity**

- 3.23. Electricity is used to power the CCTV on Site. There are no other electrical uses on Site.
- 3.24. Damaged or exposed electrical cables and fittings have the potential to give off excess heat / create sparks. Power sockets can be overloaded which may result in the overheating of these sockets and wires. There is no electrical use directly associated with the waste operations.
- 3.25. Inspections of electrics, including wiring and equipment, are carried out by site staff on a monthly basis to ensure that cables are in a good condition and sockets are not overloaded. Inspections are recorded using the Inspection Checklists form included within the EMS, see Appendix 1 Inspections Checklists.

### **Reactions between Waste**

- 3.26. Waste types are separated at source and stored separately. Each waste type is stored separately in covered metal containers on Site. Consequently, the risk of reactions between different waste types is considered to be negligible.

### **Build-up of Loose Combustible Waste**

- 3.27. Waste is stored in metal containers on Site. Combustible waste types are stored within secure containers. The majority of all waste accepted to site will be double-bagged or arrive within a small container. In this way, waste accepted to Site is unlikely to become wind-blown or otherwise escape from the storage containers.
- 3.28. The storage time of all combustible waste on the Site is kept to a minimum (< 1 month, see Table 4.1: Combustible waste storage area details). Waste storage areas will be inspected weekly to ensure that there is no build-up of loose combustible waste (litter, loose waste, fluff, dust).

### **Batteries within Waste Piles**

- 3.29. Lithium-Ion Batteries have the potential to explode when damaged, punctured, or overheated and are a significant ignition source for fires on waste sites.
- 3.30. The risk of Lithium-ion batteries entering the Site is considered to be low as batteries are not a common waste encountered in washrooms.



## 4. Managing Fire Risks from the Storage of Waste

### Storage Time

- 4.1. Restricting the maximum storage time of combustible waste will reduce the risk of self-heating within waste.
- 4.2. The maximum storage times of the permitted combustible waste types on the Site are included in Table 4.1: Combustible waste storage area details.

### Pile Dimensions, Volumes & Separation Distances

#### Pile Dimensions and Volumes

- 4.3. Waste will be stored in wheeled metal containers on Site. Dimensions of each metal container:  
1.4m (length) x 1.45m (width) x 1.1m (height) = 2.2m<sup>3</sup> (1 tonne).
- 4.4. For the purposes of calculating tonnes, it has been conservatively assumed that each 2.2m<sup>3</sup> container averages 1 tonne weight. This is likely to vary by waste type (sanitary waste and sharps), though the 1 tonne estimate is unlikely to be exceeded.
- 4.5. The maximum volume of waste to be stored at any one time is 11m<sup>3</sup> / 6 tonnes. This comprises the volume of five wheeled metal storage containers. As there is no formal separation between the containers, these have been conservatively considered as a single 'pile' of waste.
- 4.6. This volume may increase as the Operator's business expands. This FPP will be updated to reflect this.

**Table 4.1: Combustible waste storage area details**

Contents	Location	Type	Size (LWH)	Volume	Max storage time
Sharps	Northwest corner of the Site	Sealed bins on impermeable concrete surfacing.	1.4m*1.45m*1.1m (one container)	2.2m <sup>3</sup>	1 month <sup>1</sup>
Sanitary waste / bandages	Northwest corner of the Site	Sealed bins in storage containers.	1.4m*1.45m*1.1m (one container)	2.2m <sup>3</sup>	7 days <sup>2</sup>
Medicines – domestic over the counter medicine and packaging	Northwest corner of the Site	Sealed blue-stream pharmaceutical waste bins in dedicated storage containers.	1.4m*1.45m*1.1m (one container)	2.2m <sup>3</sup>	1 month <sup>1</sup>
Other ancillary washroom waste	Northwest corner of the Site	Sealed bin.	1.4m*1.45m*1.1m (one container)	2.2m <sup>3</sup>	1 month <sup>1</sup>

<sup>1</sup> In accordance with FPP/OM guidance and operational capacity

<sup>2</sup> In accordance with Appropriate Measures for Healthcare waste (offensive waste)

#### Separation Distances

- 4.7. The separation distance for combustible waste stored on the Site is implemented in accordance with both the FPMP Guidance and the risk posed by a fire in the on Site storage containers.
- 4.8. Combustible waste is stored in the north-western corner of the Site, see Drawing No 21/012h 002 Site Layout Plan.
- 4.9. Containers are roll on / roll off, easily accessible and can be moved in the event of a fire.



- 4.10. Sanitary waste is considered to comprise of loosely packed plastic. In line with the FPMP Guidance, the 'pile' of waste on Site would conservatively be assessed as coming under plastic / rubber wastes. For plastic / rubber wastes, the FPMP Guidance recommends a separation distance of 12.5 metres between loose stack and loose stack, for a pile size with a length of 7 metres (1.4 metres x 5 metres).
- 4.11. In the FPMP Guidance, separation distances were based off:
- A pile size of four metres in height.
  - Baled plastic and rubber waste.
  - The pile being comprised solely of plastic and rubber waste.
- 4.12. It has been conservatively considered that the separation distance for the 'pile' of waste on Site (5 containers) can be reduced from 12.5 metres to six metres. This is because:
- The 5-container single 'pile' will not comprise solely plastic / rubber waste (includes sharps and incidental waste).
  - Sanitary waste will not be as densely packed as baled plastic waste.
  - The metal containers are 1.1m in height (75% shorter than the heights used in the FPMP guidance).
  - The maximum volume of waste stored on site is 11m<sup>3</sup>.
- 4.13. Therefore, it is considered that employment of the standard separation distance of six metres between combustible waste piles and buildings / other combustible/flammable materials, is appropriate for the waste stored on Site.

#### **Particle Size**

- 4.14. There is no treatment of waste on the Site. It is considered that the particle size of waste stored on the Site will not be a significant contributor to self-heating as waste will be stored in its largest form.
- 4.15. Sharps waste is likely to comprise of waste which is small in size. Sharps will be accepted to Site in small (hand-held) containers. The small containers will be stored together in a larger container on Site. The separation of sharps in small containers allows for natural ventilation/cooling effects of air, which will prevent self-heating that is sometimes associated with smaller-sized waste.

#### **Seasonal Variations**

- 4.16. It is considered that seasonal impacts are unlikely to affect the amount of waste imported or exported onto the Site.

#### **Managing Temperatures within Waste Piles**

- 4.17. Waste storage durations are minimised, which will drastically reduce the likelihood of any residual heat from the treatment operations reaching points where self-combustion would occur.
- 4.18. Sharps stored on the Site will be stored for a maximum of 1 month. The FPMP Guidance does not require that an operator monitors temperatures or routinely turns piles if waste is stored for less than three months. There is therefore no proposal to monitor temperatures or routinely turn piles on this Site.
- 4.19. The rest of the waste is stored for one month. Although, the quantities stored on Site are so small that typically waste will have been fully removed from the Site before a new load arrives. The quick turn-around of waste will drastically reduce the risk of self-heating within waste piles.
- 4.20. In the event of prolonged hot weather, where possible, lids on containers will be opened to ensure any localised warming within the waste is dissipated quickly. Prolonged hot weather is defined as at least three consecutive days where the temperature is 25°C or above.



## **5. Detecting a Fire**

### **Outside of Operational Hours**

- 5.1. Elis UK Ltd operate a CCTV system, which overlooks the waste storage area. The CCTV is monitored 24/7 by a third-party to help ensure early detection of fires and detect fires outside of operational hours.
- 5.2. Information relating to active firefighting measures are included in Section 7 Suppressing a Fire and Firefighting Techniques.

### **During Operational Hours**

- 5.3. All members of staff are trained to be vigilant to the signs of fire and to report any incidents to the Site Manager or Director. Staff members will use the fire alarm system to ensure all members of staff are aware of the fire.
- 5.4. A 'Fire Watch' is undertaken by site personnel, once daily. This Fire Watch is recorded using Appendix 1 Inspection Checklists.
- 5.5. In addition to the Fire Watch, visual inspections are carried out throughout the working day to check for fires / fire hazards.



## **6. Contingency Measures During a Fire**

- 6.1. Fire contingency plans will be implemented via procedures contained within the EMS.
- 6.2. Elis UK Ltd are able to quickly cease waste imports in the event of a fire. The majority of vehicles used to import waste on to the Site are operated by Elis UK Ltd. Consequently, the Operator is able to cease the importation of waste swiftly, in the event of a fire.
- 6.3. In the event of a fire, the Site Manager or their delegate will take the following action:
  - Instruct company drivers to cease all importation of waste.
  - Notify all external customers that waste importation is paused until further notice.
  - Contact neighbouring businesses. Contact details for neighbouring businesses are included on the Key Contacts Form within the EMS.



## 7. Suppressing a Fire & Firefighting Techniques

### Fire and Waste Quarantine Area

- 7.1. Waste will be stored separately in covered metal bins or metal cages, separated by waste type.
- 7.2. In accordance with the FPMP guidance waste piles must be stored with adequate separation distance or separated by fire-proof walls.
- 7.3. In accordance with the FPMP guidance, the proposed storage conditions are considered to comprise a single waste storage area.
- 7.4. Whilst the bins are moveable, in the event of a fire, it is considered impractical to move the waste to another area on Site. Waste will be kept in the waste storage area whilst the fire is suppressed, see Site Layout Plan Drawing No. 21/012h 003.
- 7.5. As the waste will not be moved, the waste storage area will constitute the Fire Quarantine Area.
- 7.6. In the event that contravening waste is brought onto the Site, this will be quarantined in the Waste Quarantine Area. The Waste Quarantine Area will comprise an empty metal storage container, see Site Layout Plan Drawing No. 21/012h 003.

### Suppressing a Fire

#### Fire Extinguishers

- 7.7. Fire extinguishers will be used as a first response measure in the event of a fire or to extinguish smaller fires before a larger problem arises.
- 7.8. Firefighting extinguishers are provided within the building on the Whole Site for use in the suppression of fires. The locations of fire extinguishers are shown on Drawing No. 21/012h 002 Site Layout Plan.
- 7.9. Site Operatives must only tackle small fires on the Site and must not put themselves at risk by trying to fight medium / large fires. In the event of a medium / large fire, the emergency services will always be contacted. If there is any doubt over the scale of a fire, the emergency services will be contacted.
- 7.10. Upon arrival on Site, the fire service will assume overall control of all firefighting activities.

#### Water

- 7.11. The Site has access to mains water. The cut-off for the mains water supply is shown on Drawing No. 21/012h 002 Site Layout Plan.
- 7.12. A fire engine contains, on average, 3,500 litres (3.5m<sup>3</sup>) of water within the engine itself. It is likely that this volume will be used as a first response measure to extinguish any fire on Site.
- 7.13. This volume of water would be sufficient in extinguishing the largest waste 'pile'.
- 7.14. South Wales Fire & Rescue Service have verbally advised that there are two fire hydrants within 350m of the Site, see Figure 1.
- 7.15. The coordinates and location of the fire hydrants in relation to the Site are given in Table 7.1: Fire hydrant locations.

**Table 7.1: Fire hydrant locations**

Hydrant No.	Coordinates	Distance from Site (m)	Direction from Site
1	X 353509 Y 192937	250	Northwest
2	X 353396, Y 192777	340	West



**Figure 1 Fire hydrant locations (blue square)**



- 7.16. FPMP guidance states that a guideline application rate of 2,000 litres of water per minute for 3 hours is required to extinguish a 300m<sup>3</sup> stockpile of waste. South Wales Fire and Rescue Service have advised that all hydrants meet the British Standard (BS 750). Therefore, it is considered that the hydrants close to Site can deliver the minimum flow rate of 2,000 litres per minute as stipulated by the British Standard.
- 7.17. In the event of a fire and the need for water as a suppression measure, due to the gradient of the Site, water will pool in the Fire Water Containment Area, see Drawing No. 21/012h 004 Fire Water Containment Plan. The Operator will immediately seal the drains in the Firewater Containment Area to prevent any fire water entering the drainage system.

Water volume to extinguish maximum pile size currently on Site

- 7.18. The maximum volume of waste to be stored at any one time is 11m<sup>3</sup>. This comprises the volume of five wheeled metal storage containers. As there is no formal separation between the containers, these have been conservatively considered as a single 'pile' of waste.
- 7.19. It is calculated that 13,200 (13.2m<sup>3</sup>) litres of water would be required to extinguish a fire involving the largest (and only) pile of combustible waste stored on Site (11m<sup>3</sup>). The calculation is as follows:
- 2,000 l/min (flow rate required in FPMP guidance) / 300m<sup>3</sup> (pile size in FPMP guidance) x 180 minutes (3 hours in FPMP guidance) = 1,200 litres of water required per m<sup>3</sup> of waste.
  - 1,200 litres x 11m<sup>3</sup> (largest waste pile on Site) = 13,200 (13.2m<sup>3</sup>) litres (volume of water required to extinguish largest pile size).
  - 13,200 litres / 2,000 l/min (flow rate) = 7 minutes.
- 7.20. It is calculated that it will take approximately 7 minutes to extinguish a fire with the 13,200 litres (13.2m<sup>3</sup>) of water above.
- 7.21. However, in practice, it is considered unlikely that this volume of water would be required to extinguish a fire in one or more of the metal containers.
- 7.22. As mentioned in Section 3 Self-Heating and Self Combustion, the sanitary waste poses the greatest risk of fire in terms of combustibility and sustaining a fire. It is considered unlikely that the plastic within this waste is capable of reaching the high temperatures (c.1,500 degrees) capable of melting the metal containers.
- 7.23. Therefore, it is considered that water used to extinguish a fire would collect within the metal containers. The capacity of each container is 2.2m<sup>3</sup>. With the container filled with water, it is considered that no fire is possible to remain. Therefore, the volume of water required for extinguishing a fire stored at the Site



is more likely to be a maximum of 11m<sup>3</sup>, with the water having come into contact with the waste (firewater) being contained within the containers.

- 7.24. It is unlikely for this small volume of water that fire hydrants would be use. It is likely that the water within the fire engine would be used as a first response.

Water volume to extinguish a single container.

- 7.25. It is calculated that a total of 2,700 litres of water would be required to extinguish a fire involving one container (2.2m<sup>3</sup>). The calculation is as follows:

- 2,000 l/min (flow rate required in FPMP guidance) / 300 m<sup>3</sup> (pile size in FPMP guidance) x 180 minutes (3 hours in FPMP guidance) = 1,200 litres of water required per m<sup>3</sup> of waste.
- 1,200 litres x 2.2 m<sup>3</sup> (volume of storage container) = 2,640 litres (volume of water required to extinguish one waste container).
- 2,640 litres / 2,000 l/min (flow rate) = 2 minutes to extinguish a fire involving one container.

- 7.26. Based on the above calculation, it will take approximately 2 minutes to extinguish a fire in a single container.

- 7.27. However, in practice, it is considered unlikely that this volume of water would be required to extinguish a fire in one metal container.

- 7.28. As discussed above, the capacity of each container is 2.2m<sup>3</sup>. With the container filled with water, it is considered that it is not possible for fire to remain. Therefore, the volume of water required for extinguishing a fire in one container is likely to be a maximum of 2.2m<sup>3</sup>.

- 7.29. It is unlikely for this small volume of water that fire hydrants would be use. It is likely that the water within the fire engine would be used as a first response.

- 7.30. The water having come into contact with the waste (firewater) will be therefore likely to be contained within the metal containers.

Water volume to extinguish 50 tonnes / 100m<sup>3</sup> (50 containers of waste)

- 7.31. As discussed above, there is capacity for 50 tonnes / 100m<sup>3</sup> of waste to be stored on Site if the appropriate Site infrastructure is built.

- 7.32. It is calculated that a total of 120,000 litres (120m<sup>3</sup>) of water would be required to extinguish a fire involving 50 containers of waste. The calculation is as follows:

- 2,000 l/min (flow rate required in FPMP guidance) / 300 m<sup>3</sup> (pile size in FPMP guidance) x 180 minutes (3 hours in FPMP guidance) = 1,200 litres of water required per m<sup>3</sup> of waste.
- 1,200 litres x 100 m<sup>3</sup> (volume of storage container) = 120,000 litres (120m<sup>3</sup>) volume of water required to extinguish 50 containers of waste.
- 120,000 litres / 2,000 l/min (flow rate) = 60 minutes to extinguish a fire involving 50 containers.

- 7.33. However, in practice, it is considered unlikely that this volume of water would be required to extinguish a fire in one metal container.

- 7.34. As discussed above, the capacity of each container is 2.2m<sup>3</sup>. With the containers filled with water, it is considered that it is not possible for fire to remain. Therefore, the volume of water required for extinguishing 50 containers is 100m<sup>3</sup>.

- 7.35. It is unlikely for this small volume of water that fire hydrants would be use. It is likely that the water within the fire engine would be used as a first response.

- 7.36. Information regarding firewater containment is provided in Section 8 Recovery after a Fire.





## Firefighting Techniques

### Outside of Operational Hours

- 7.37. South Wales Fire & Rescue Service have confirmed that the emergency services will enter the Site through force if they arrive at the Site before a key holder is present.
- 7.38. Emergency Services aim to reach a site within twenty minutes. Chepstow Fire Station is located 0.9 miles (5-minute drive) from the Site.
- 7.39. The emergency services are likely to tackle the fire using water from their fire engines. Fire engines can be refilled using the nearby fire hydrants.

### Within Operational Hours

- 7.40. Elis UK Ltd implement the following suppression and firefighting measures to minimise the impact of a fire:
  - Contact emergency services (if they have not been already).
  - Contact neighbouring businesses and key contacts (including firewater removal company).
  - If safe to do so, the first line of fire defence will be the use of fire extinguishers by Site staff.
  - The Site Manager or Director will liaise with the emergency services upon arrival to inform them of the locations of combustible materials and the active firefighting actions taken up to that point e.g., any chance of reignition of burned waste.
- 7.41. The emergency services are likely to tackle the fire using water from their fire engines. Fire engines can be refilled using the nearby fire hydrants.
- 7.42. Fire Procedures within the EMS contain information from this FPMP. The implementation of these procedures will therefore implement the requirements of this FPMP. These procedures form the basis for training and shall be followed in the event of a fire.



## 8. Recovery after a Fire

### Managing Firewater

- 8.1. The combustible waste storage area is located on impermeable surfacing. It is considered likely that water will remain in the metal containers prior to being vacuumed off by a licensed contractor. If water was to be sprayed outside of the containers during suppression, this would be contained within the waste storage area by kerbing, and then vacuumed off by a licensed contractor.
- 8.2. The worst-case scenario of the maximum volume of water escaping the metal containers has been considered.
- 8.3. It has been calculated that a maximum of 11,000 litres (11m<sup>3</sup>) of firewater would be produced when tackling a fire involving the largest pile of waste stored on the Site (5 containers in a row), see Section 7 Suppressing a Fire and Firefighting Techniques.
- 8.4. The ground level gradient has been taken into consideration when considering the capacity of the Site to contain firewater and the logistics of firewater containment.
- 8.5. The Site surface is laid-to-fall from northeast to southwest towards the exit of the Site. Part-way along the exit from the Whole Site, the site surface rises again steeply to the gated entrance. The calculated area where firewater will collect is shown on Drawing No. 21/012h 004 Firewater Containment Plan.
- 8.6. The integrity of the Site infrastructure, including surfacing and the containers are inspected on a regular basis using Appendix 1 Inspection Checklists. Any defects are rectified as soon as reasonably practicable.

### Firewater Containment

- 8.7. The Fire Water Containment Area is the area on Site where water will pool. The location of the Fire Water Containment area is shown on Drawing No. 21/012h 004 Fire Water Containment Plan.
- 8.8. Kerbing (10-12cm high) borders the Permit boundary to the north, east and west. The laundry building borders the Permit boundary to the southeast and to the southwest is the site entrance/exit route. The kerbing will ensure that firewater is contained within the impermeable surface area, see Drawing No. 21/012h 004 Firewater Containment Plan.
- 8.9. The steep gradient to the west of the firewater containment area will contain the firewater, see Drawing No. 21/012h 004 Firewater Containment Plan.
- 8.10. The drain in the Firewater Containment Area will be covered by a mat to prevent firewater escaping down. The location of the mat is shown on Drawing No. 21/012h 004 Firewater Containment Plan.
- 8.11. The details of when the drain should be covered are included in the Fire Prevention Procedure in the EMS.

### Firewater depth - maximum waste volume

- 8.12. It has been calculated that a maximum of 11,000 litres (11m<sup>3</sup>) of firewater would be produced when tackling a fire involving the largest pile of waste stored on the Site (5 containers in a row), see Section 7 Suppressing a Fire and Firefighting Techniques.
- 8.13. The firewater storage capacity on Site has been calculated as follows:
  - 25m (length of water containment area) x 15m (width of water containment area) = 375 m<sup>2</sup> (area of Firewater Containment Area).
  - Site surface levels fall by 0.3m.
  - Area of 375m<sup>2</sup> x 0.3m = 113 m<sup>3</sup> (volume of water that can be held in the water containment area).
  - Total water storage in the south-eastern corner is 113 m<sup>3</sup>. Therefore, there is enough capacity to contain the maximum volume of water (11m<sup>3</sup>).
  - 11 m<sup>3</sup> / 375 m<sup>2</sup> (area of Firewater Containment Area) = 3cm (depth of firewater)



- 8.14. The maximum depth of water that can be held in this area is 10-12cm due to the height of the kerbing. The maximum depth will be 3cm of water. Therefore, firewater will be contained.

Firewater depth – 50 tonnes / 100m<sup>3</sup> of waste (50 containers)

- 8.15. It has been calculated that a maximum of 100,000 litres (100m<sup>3</sup>) of firewater would be produced when tackling a fire involving 50 containers of waste, see Section 7 Suppressing a Fire and Firefighting Techniques.
- The firewater storage capacity on Site has been calculated as follows:
  - 25m (length of water containment area) x 15m (width of water containment area) = 375 m<sup>2</sup> (area of Firewater Containment Area).
  - Site surface levels fall by 0.3m.
  - Area of 375m<sup>2</sup> x 0.3m = 113 m<sup>3</sup> (volume of water that can be held in the water containment area).
  - Total water storage in the south-eastern corner is 113 m<sup>3</sup>. Therefore, there is enough capacity to contain the maximum volume of water (100 m<sup>3</sup>).
  - 100 m<sup>3</sup> / 375 m<sup>2</sup> (area of Firewater Containment Area) = 27cm (depth of firewater)
- 8.16. If 50 containers were stored on Site, the kerbing in the Fire Water Containment Area would be built to a minimum height of 27cm, to be able to contain the volume of firewater required.

**Drainage**

- 8.17. The waste will be stored on a sealed impermeable pad in the north-eastern corner of the Site.
- 8.18. Surface water will be kept on the impermeable surfacing by the 10-12cm high kerbing. Surface water will be vacuumed off to a suitably licensed facility.
- 8.19. There is a cover over the top of the waste storage area, that will help prevent rainwater from entering this area.
- 8.20. The integrity of the Site infrastructure, including surfacing and containment features (kerbing) are inspected on a regular basis using Appendix 1 Inspection Checklists. Any defects are rectified as soon as reasonably practicable.

**Contingency Measures – Managing Burned Materials**

- 8.21. Burned waste will be monitored following a fire to ensure the fire is completely extinguished.
- 8.22. Ash and partially burned materials resulting from a fire will be contained and then removed from the Site. This is to reduce the risk of contaminants potentially leaching into surface water features / reaching groundwater. Burned materials will be sent to a suitably licensed facility.
- 8.23. The importation of waste will resume as soon as the risk of further fires has been considered and the Site is determined to be safe.

**Steps to Becoming Operational**

- 8.24. Following a fire, Elis UK Ltd will employ the following steps before accepting waste and becoming operational:
- All burned materials will be removed to a suitably licensed facility.
  - All firewater contained on the surface of the Site will be removed by a licensed contractor to a suitably licensed facility.
  - Following any environmental incident on the Site including fires, details of the event will be recorded on an Accident / Incident form included within the EMS. Completion of the form will enable all the details of the fire to be recorded including sequence of events, causation, size and extent of fire, damage sustained (internally and externally), recording of the investigation and actions taken.



## 9. Reviewing and Monitoring

### Reviewing the FPMP

9.1. The FPMP will be reviewed biennially (once every two years) and if any of the following occur:

- A fire incident.
- Additional combustible waste types are accepted on to the Site.
- An increase in the annual throughput of combustible waste accepted.
- An increase in the amount of combustible waste stored.
- The construction of new infrastructure e.g. buildings.
- The installation of new plant / equipment.

### Staff training

- 9.2. A copy of this FPMP will be kept in the Site office and be readily available to all members of staff.
- 9.3. The content of this FPMP is implemented through procedures contained within the EMS. All Site staff are required to undertake training on the fire prevention procedures. The training undertaken by each member of staff is recorded on their own training record as part of the EMS.
- 9.4. Training on implementing fire prevention procedures will be given to staff on an annual basis by the Site Manager. New members of staff will be given training on the fire prevention procedures during their induction.
- 9.5. A fire drill will be completed on a six-monthly basis to test how well the FPMP works and to make sure staff understand what to do in the event of a fire on Site. Details of the fire drill are included in Section 1 Using this Fire Prevention & Mitigation Plan.

### Monitoring

- 9.6. Regular checks are carried out (daily, weekly, monthly, annually) to ensure control measures are implemented and to enable remedial actions to be put into place as soon as possible, see Appendix 1 Inspection Checklists. Records of completed checklists are kept within the Site office.
- 9.7. Inspections of electrics, including wiring and equipment, are carried out by Site staff on a monthly basis to ensure that cables are in a good condition and sockets are not overloaded. Inspections are recorded using the Inspection Checklists form included within the EMS, see Appendix 1 Inspection Checklists.
- 9.8. All electrics, including wiring and equipment, on the Site are certified by a qualified electrician on an annual basis. A record of this certification is recorded using the Inspection Checklists.
- 9.9. Combustible waste storage areas will be managed using the Inspection Checklist to ensure the maximum storage times (given in **Error! Reference source not found.**) are not exceeded.
- 9.10. The Inspection Checklists includes checks for ensuring combustible waste storage areas are in accordance with this FPMP and that storage areas are cleared within the maximum storage time.
- 9.11. A storage area will be cleared if the area has not been cleared within the maximum storage time. This will be managed using the Inspection Checklist.



## Drawings

Drawing No. 21/012h 001	Permit Boundary Plan
Drawing No. 21/012h 002	Site Layout Plan
Drawing No. 21/012h 003	Sensitive Receptor Plan
Drawing No. 21/012h 004	Firewater Containment Plan



Client: Elis UK Ltd

Chepstow Permit Boundary

Site:  
Bulwark Road,  
Bulwark Industrial Estate,  
Chepstow,  
NP16 5QZ

Date: 16 November 2022

Scale: 1:5,750

Reference: 21/012h 001

Drawn by: EG  
Checked by: KB



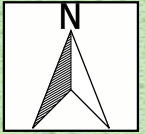
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W [www.westburyenv.co.uk](http://www.westburyenv.co.uk)

## Legend

Permit Boundary



(C) OS  
OpenStreetMaps





Client: Elis UK Limited

Title: Site Layout Plan

Reference: 21/012h 002 V1

Site: Bulwark Trading Estate,  
Chepstow,  
NP16 5QZ

Scale: 1:600

Date: 24/01/2023









Created by: LR  
Checked by: KB

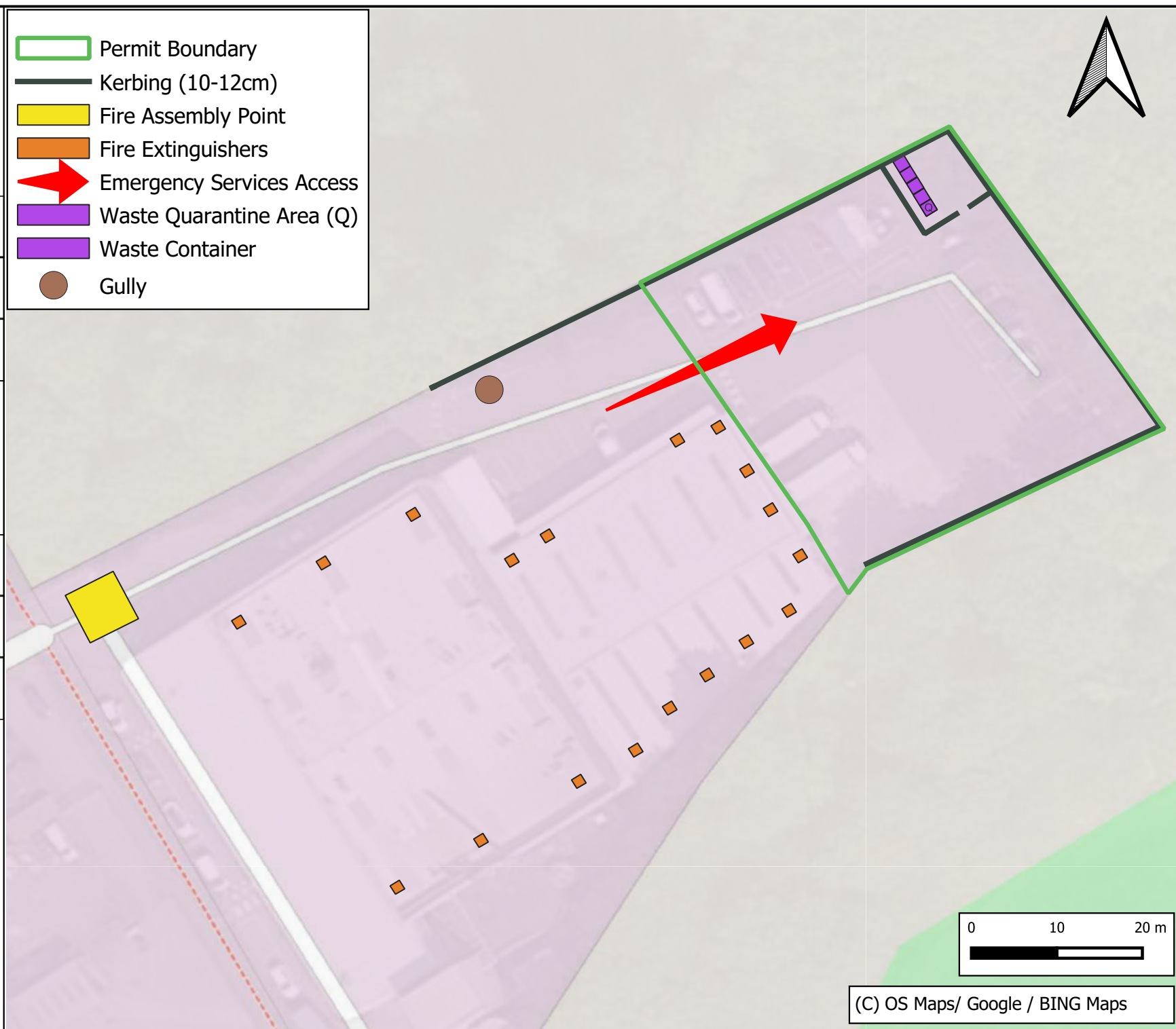


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-  Permit Boundary
-  Kerbing (10-12cm)
-  Fire Assembly Point
-  Fire Extinguishers
-  Emergency Services Access
-  Waste Quarantine Area (Q)
-  Waste Container
-  Gully



(C) OS Maps/ Google / BING Maps



Client: Elis UK Ltd

Sensitive Receptors

Site:  
Bulwark Road,  
Bulwark Industrial Estate,  
Chepstow,  
NP16 5QZ

Date: 16 November 2022

Scale: 1:22500

Reference: 21/012h 003

Drawn by: EG  
Checked by: KB



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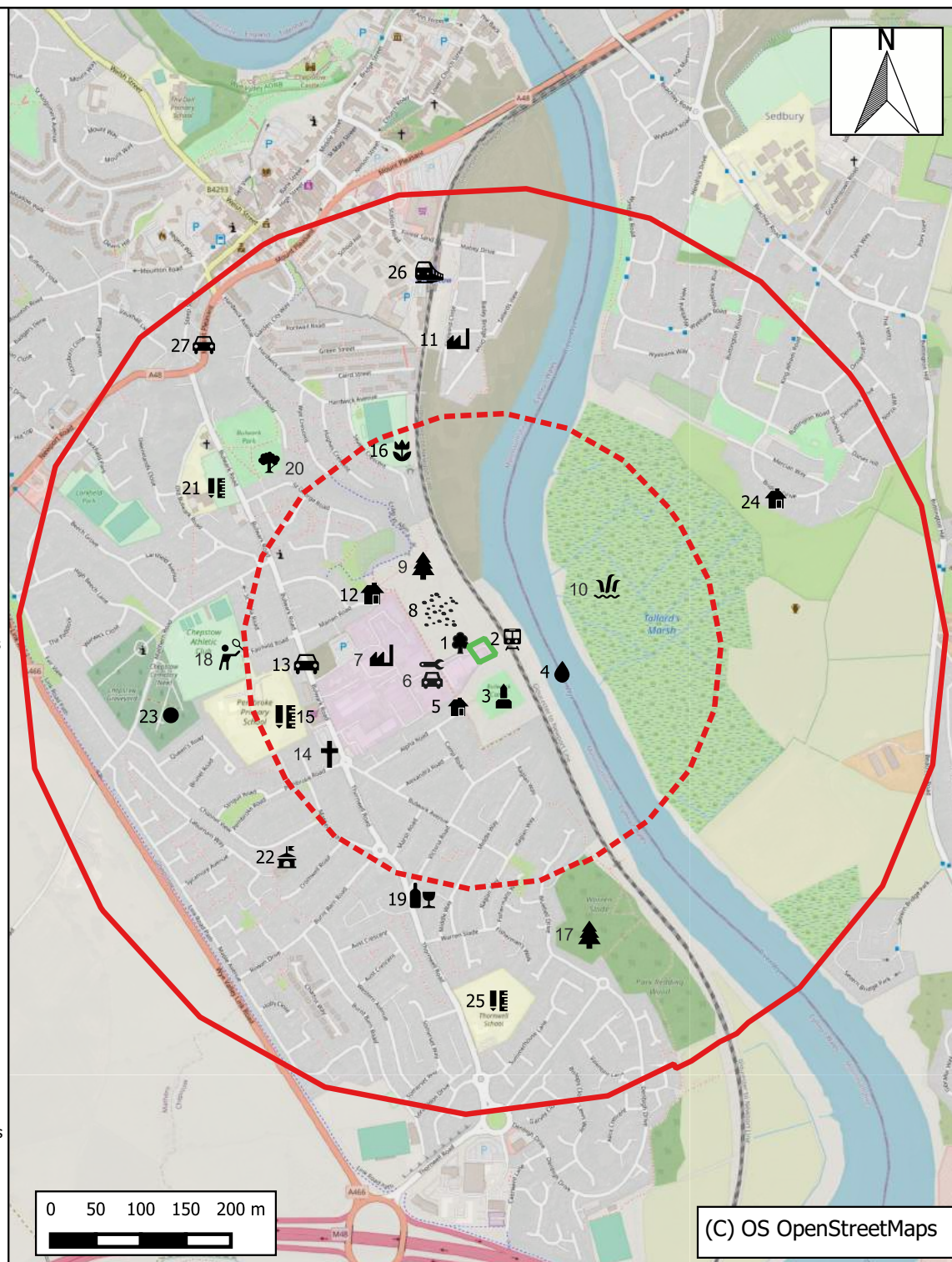
W www.westburyenv.co.uk

## Legend

- Permit Boundary
- 500m Buffer
- 1km Buffer

## Receptors

- 1. Broadleaved woodland
- 2. Trainline
- 3. Bulwark Camp
- 4. River Wye (SSSI)
- 5. Alpha Road Residential Dwellings
- 6. Ed's Autos Car Repair
- 7. Bulwark Industrial Estate
- 8. Beaufort Quarry
- 9. Ancient woodland
- 10. Pennsylvania Fields (SSSI)
- 11. Mill Lane Industrial Estate
- 12. Marten Road Residential Dwellings
- 13. Bulwark Road
- 14. St Christopher's
- 15. Pembroke Primary School
- 16. Allotments
- 17. Warren Slade and Park
- 18. Chepstow Athletics Club
- 19. The Two Brewers
- 20. Bulwark Park
- 21. St Marys Primary School
- 22. Bulwark Community Centre
- 23. Chepstow Cemetery
- 24. Bridget Drive Residential Dwellings
- 25. Thornwell Primary School
- 26. Chepstow Train Station
- 27. A48



(C) OS OpenStreetMaps





Client: Elis UK Limited

Title: Firewater Containment  
Plan

Reference: 21/012h 004 V1

Site: Bulwark Trading Estate,  
Chepstow,  
NP16 5QZ

Scale: 1:500

Date: 24/01/2023

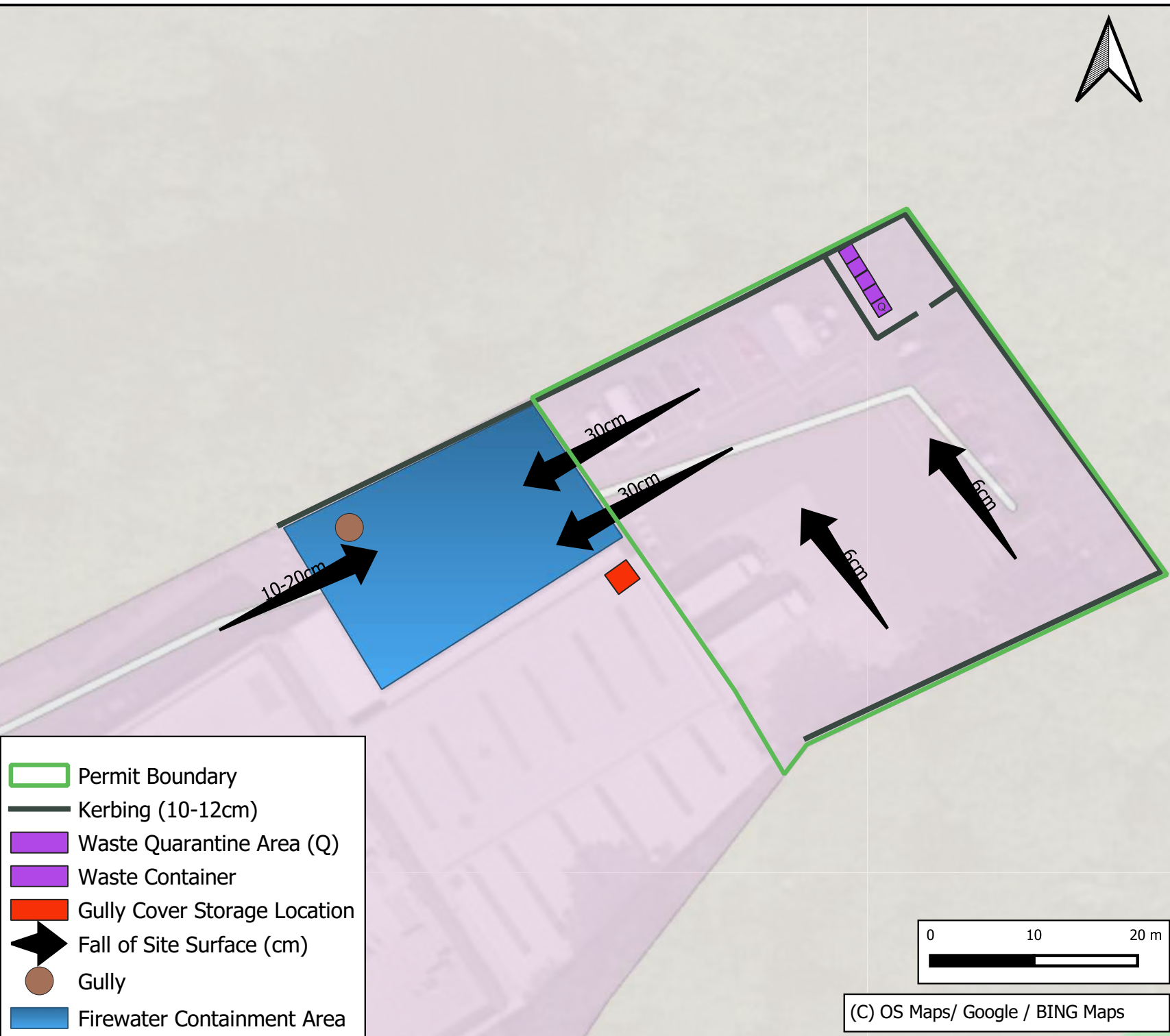
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**Appendix 1**  
Inspection Checklists



Daily Inspection Checklist			
Item for Visual Inspection	Aspects for Inspection	Checked Y/N	Remedial Action Required (Y/N, describe)
Litter	None present within waste storage areas		
	None present along or outside site boundaries (fencing etc.)		
Fire	Fire watch (No evidence of heating, smoke or fire)		
Dust emissions	No dust emissions escaping the boundary of the site		

Date: \_\_\_\_\_

Completed by: \_\_\_\_\_

Signature: \_\_\_\_\_



Weekly Inspection Checklist			
Item for Visual Inspection	Aspects for Inspection	Checked Y/N	Remedial Action Required (Y/N, describe)
Site Security	CCTV system is operational		
	Fencing around site perimeter is in good condition.		
	Lock on gated entrance is working and no signs of corrosion.		
Waste Storage	Waste storage areas are not exceeding the dimensions included in the Fire Prevention Plan.		
	Waste storage areas are free from build-up (litter, loose waste, fluff, dust).		
Weather	Weather forecast has been checked for coming week to determine if waste operations are likely to be impacted.		
Odour Monitoring	Odour monitoring using the sniff test and recorded on the Odour Monitoring Form.  (during periods of extreme warmer weather above 25 degree C odour monitoring will take place more frequently).		
Waste storage (Sanitary)	Waste stored on Site does not exceed maximum storage time (7 days).		

Date: \_\_\_\_\_

Completed by: \_\_\_\_\_

Signature: \_\_\_\_\_



Monthly Inspection Checklist			
Item for Visual Inspection	Aspects for Inspection	Checked Y/N	Remedial Action Required (Y/N, describe)
Impermeable surfacing	Free from cracks which may allow water to reach the ground below.		
Containers	Containers free from cracks which may result in loss of containment.		
Waste storage (Sharps, Medicine, Ancillary)	Waste stored on Site does not exceed maximum storage time (1 month).		
Fire	Fire alarm system is in good working order.		
Drains	Drains are free from blockages.		
Electrics	Wires are not frayed / damaged.		
	Sockets are not overloaded.		

Date: \_\_\_\_\_

Completed by: \_\_\_\_\_

Signature: \_\_\_\_\_



Annual Inspection Checklist			
Item for Visual Inspection	Aspects for Inspection	Checked Y/N	Remedial Action Required (Y/N, describe)
Site Security	The gates to the site are in working order and are lockable.		
Waste Storage Bins / Containers	No cracks or imperfections which could cause waste to escape.		
	Locks are working.		
Electrics	Electrics to be inspected and certified by a qualified electrician.		
Fire	Fire extinguishers in place and no obvious damage.		

Date: \_\_\_\_\_

Completed by: \_\_\_\_\_

Signature: \_\_\_\_\_



## **Appendix 2**

### Odour Management Plan



## Odour Management Plan

Elis UK Ltd  
Bulwark Road,  
Bulwark Industrial Estate,  
Chepstow,  
NP16 5QZ.



PROVIDING SOLUTIONS, ENSURING COMPLIANCE

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## Document Control Table

Project Reference	21/012h
Project Title	Odour Management Plan
Document Title	Odour Management Plan, Version 1
Document Issue Date	01 March 2023
Client	Elis UK Ltd
Status	Issued

## Change log

Version	Changes	Produced by	Checked by	Authorised by	Date
1	Original	Emma Gibson	Tracey Westbury	Tracey Westbury	01 March 2023



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## Drawings

Drawing No. 21/012h 001	Permit Boundary Plan
Drawing No. 21/012h 003	Sensitive Receptor

## Appendices

Appendix 1	Inspection Checklist
Appendix 2	Odour Complaint Form
Appendix 3	Odour Monitoring Form



## 1. Introduction

- 1.1. Westbury Environmental Limited has prepared this Odour Management Plan (OMP) on behalf of Elis UK Ltd (Operator). This OMP has been prepared to systematically assess, reduce, and prevent potentially odorous emissions in accordance with Environmental Permitting Regulations.
- 1.2. This OMP relates to the prevention of potentially odorous emissions from the storage of waste at Bulwark Road, Bulwark Industrial Estate, Chepstow, NP16 5QZ (Site).
- 1.3. This Odour Management Plan has been produced in accordance with the following guidance:
  - Natural Resources Wales Technical Guidance Note H4: *Odour Management – how to comply with your environmental permit (V2, October 2014)*.
  - Healthcare waste: appropriate measures for permitted facilities (13<sup>th</sup> July 2020).
- 1.4. Elis UK Ltd operate a clinical waste transfer station. The permitted area extends to approximately 0.1 hectares, see Drawing No. 21/012h 001 Permit Boundary Plan.

### Objectives

- 1.5. This OMP assesses the risk of 50 tonnes of waste stored on Site.
- 1.6. This OMP has been developed to aid the decision-making process on the choice of controls, general site design, and operation practice in line with current industry best practice. The OMP is a working document with the specific aims of ensuring:
  - All potential odour sources are identified.
  - Odour impact is considered as part of routine inspections.
  - The minimisation of the risk of unplanned odour releasing incidents or accidents that could result in offsite annoyance.
  - Odour is primarily controlled at source by good operational practices, the correct use and maintenance of storage areas, and operator training.
  - All appropriate measures are taken to prevent or, where that is not reasonably practicable to minimise odorous emissions from the Site.
- 1.7. This Odour Management Plan will form part of the Environmental Management System (EMS) for the Site. Procedures and Forms referenced within this Odour Management Plan are included within the EMS.
- 1.8. A copy of the EMS, including the Odour Management Plan, will be stored in the Site office. In addition, completed forms (records) will be kept, as required by conditions included in the Environmental Permit.

### Review

- 1.9. The Odour Management Plan will be reviewed annually or in the event of the following:
  - If a change in operation is deemed to potentially increase risk of odour emissions.
  - Following a report or incident.
- 1.10. The review process will amend or update any mitigation measures that have been identified as areas for improvements to prevent odour emissions from the Site.

### Responsibilities

- 1.11. The manager of the Site is responsible for the general management of the Site including the acceptance and handling of any potentially odorous wastes. In relation to this OMP the manager of the Site will undertake the following responsibilities:
  - Implement the Odour Management Plan.
  - Investigate complaints.



- Cease activities in the event of a significant emission.
- Review and update the Odour Management Plan.
- Delegate of duties to suitably trained personnel.
- Deliver or organise the necessary training for Site Operatives.
- Ensure all equipment on site is maintained as required.

1.12. The Site Manager will ensure all operational staff are familiar with the requirements and conditions of the Site and the documentation to be implemented. All staff with responsibility for managing stored waste will receive training on site documentation (which includes this OMP) in addition to all relevant company procedures.

1.13. Site Operatives are responsible for:

- Carrying out routine checks (i.e., using the Inspection Checklist, see Appendix 1).
- Ensuring the storage of waste is not causing odour emissions.
- Ensuring any issues are reported to management as soon as possible.

### **Definitions used within this report**

1.14. The term 'significant odour emissions' is used within this report to refer to material that contains a significant amount of odour such that when the material is handled it gives off a highly detectable amount of odour. Wastes containing significant odour emissions are not permitted at the Site.

1.15. The term 'significant', when referring to odour generation, is used to describe a significant odour emission that is anticipated to cause nuisance or adverse impacts to nearby receptors, be detected beyond the Site boundary.

1.16. The term 'significantly odorous' is when a waste emits an odour detectable beyond the Site boundary. Wastes containing significant odour are not permitted at the Site.

### **Content of the Odour Management Plan**

1.17. This Odour Management Plan is structured as follows:

- Section 1 provides an overview of the Odour Management Plan objectives and responsibilities.
- Section 2 provides a summary of the relevant legislation and guidelines.
- Section 3 provides a summary of the operations carried out on Site.
- Section 4 provides information relating to the Site setting, including Site location, sensitive receptors, meteorological conditions, and potential sources of odour.
- Section 5 provides information about the scale on which odour will be assessed.
- Section 6 provides information on the site management and the mitigation measures.
- Section 7 outlines the actions to be taken in the event of an incident or emergency which could cause an emission.
- Section 8 provides a description of how complaints can be made and how they are addressed by the Site management.



## **2. Relevant legislation**

- 2.1. The Environmental Protection Act 1990, Part III, Section 79 is the primary legislation for controlling odour from industrial, trade and business premises.

### **Compliance with Environmental Permit**

- 2.2. Natural Resources Wales (NRW) ensures odour from permitted facilities is controlled by writing conditions relating to odour emissions into the Environmental Permit.
- 2.3. If NRW consider that odour emissions are at an unreasonable level, then the Operator will be required to take further abatement measures to reduce odour pollution or risk having to reduce or cease operations.
- 2.4. A final determination as to whether there has been a permit breach will involve an assessment of the level and effect of the emissions and the appropriateness of the measures being employed.



### 3. Operations at the Site

#### Overview

- 3.1. Select non-hazardous washroom and medicine waste is accepted at the Site for short term storage and transfer. Waste is both collected from customers and brought onto Site by the Operator. Waste is stored in storage containers before removal to a suitably licenced facility for disposal.
- 3.2. There will be no treatment or sorting of waste undertaken at the Site.
- 3.3. Waste accepted will comprise of:
  - Non-infectious sharps (18 01 01, 18 02 01 and 20 01 99).
  - Feminine hygiene products, nappies, and bandages (18 01 04).
  - Non-hazardous medicines (18 01 09, 18 02 08 and 20 01 32).
  - Other separately collected non-hazardous waste e.g., non-infectious sharps, dead animals, or vomit (20 01 99).
- 3.4. Washroom waste, including feminine hygiene products, nappies, and bandages (18 01 04), has the potential to contain materials of a putrescible nature and in accordance with appropriate measures guidance for healthcare waste updated on 8<sup>th</sup> December 2021 is considered an 'offensive waste'.
- 3.5. All waste will be collected separately and stored appropriately at the Site. Further details on the storage are provided below.
- 3.6. Waste throughputs will be no more than 1,000 tonnes of waste per annum. No more than fifty tonnes of waste will be stored on Site at any one time.
- 3.7. Operational hours are between 08:00 – 17:00 Monday to Friday. The Site is not operational on weekends or bank holidays.

#### Waste Acceptance

- 3.8. Washroom waste is collected from customer sites in secure bags before being collectively placed into a secondary containment bag. Once arrived on Site, waste is transferred to secure storage containers.
- 3.9. Waste loads are determined whether they can be accepted upon collection from the customer premises. On first inspection at a customer premises if the waste is not deemed acceptable under the permitted waste codes or is malodorous the load will not be collected.
- 3.10. Waste is collected from commercial and industrial premises; inspections are made at both the collection point and end point in terms of delivery to Elis UK Ltd Site. This responsibility is given to the collection team / delivery drivers.
- 3.11. All waste types are subject to visual inspection before collection to confirm the description. If the collection team are satisfied the waste meets the requirements of the permit and the waste is suitable, the waste is accepted, and a waste transfer note is issued to the customer.
- 3.12. A second inspection will take place during the transfer of waste from the vehicle to the secure storage containers. Any waste found to be excessively malodorous will be quarantined and arrangements made for it to be removed from Site.
- 3.13. Non-hazardous sharps and medicine waste is collected in individual colour coded containers, which are difficult to open each container to check the contents. In these instances, checks are made to confirm the waste is appropriate for storage based on its colour-coded packaging.

#### Waste Storage

- 3.14. Incoming waste is transferred from the delivery vehicle to secure waste storage containers consisting of either sealed lockable bins or lockable cages.



- 3.15. Bagged washroom waste will be stored under a covered structure in sealed bins on impermeable surfacing. The bulking of washroom waste will take place within the sealed storage bins.
- 3.16. Sealed sharps bins and sealed blue-stream pharmaceutical waste bins are collectively stored in dedicated storage bins for each waste type.
- 3.17. Waste storage containers will not be overfilled. If the volume of waste stored on Site is near maximum capacity of the storage containers, then the Operator may choose to not collect anymore waste until sufficient storage is available.
- 3.18. Waste storage areas are inspected regularly as part of the Site inspection regime.
- 3.19. Offensive waste with the potential to cause odour is stored for a maximum of 7 days. Maximum storage times for all wastes are shown in Table 3.1 below.

**Table 3.1 Waste types and maximum storage times**

Waste code	Waste description	Max storage duration
18 01 01	Sharps (except 18 01 03)	1 month <sup>1</sup>
18 01 04	Waste whose collection and disposal is not subject to special requirements in order to prevent infection (for example, dressings, plaster casts, linen, disposable clothing, diapers) Feminine hygiene products, nappies, bandages, and similar items.	7 days <sup>2</sup>
18 01 09	Medicines other than those mentioned in 18 01 08.	1 month <sup>1</sup>
18 02 01	Sharps (except 18 02 02).	1 month <sup>1</sup>
18 02 08	Medicines other than those mentioned in 18 02 07	1 month <sup>1</sup>
20 01 32	Medicines other than those mentioned in 20 01 31	1 month <sup>1</sup>
20 01 99	Non-infectious sharps, dead animals, vomit, feminine hygiene products, nappies, bandages, and similar items. Or other non-hazardous fractions not otherwise specified.	1 month <sup>1</sup>

<sup>1</sup> In accordance with FPMP/OM guidance and operational capacity

<sup>2</sup> In accordance with Appropriate Measures for Healthcare waste (offensive waste)



## 4. Source, pathway, receptor

### Source

#### Potential sources of odour

- 4.1. The storage of non-hazardous washroom waste (18 01 04) is the primary source for potentially odorous emissions from the Site.
- 4.2. The washroom waste accepted under waste code 18 01 04 in accordance with appropriate measures guidance for healthcare waste is considered to be 'offensive waste'.

#### Other sources of odour

- 4.3. The primary off-site source of odour would be associated with the wider industrial estate. There are multiple businesses within Bulwark Industrial Estate that have the potential to generate odour emissions. These include Chepstow Fuel Centre who produce cannister bottles of gas, Air products who also produce gas supply and multiple vehicle repair facilities.

### Pathway

- 4.4. Odour can reach nearby receptors by air/ wind. The distance and direction that these emissions will be carried is determined by meteorological conditions.

#### Meteorological Conditions

##### **Wind direction**

- 4.5. The main controlling factor in determining the pathway of odour is the ambient meteorological conditions. This is fundamental to the transportation of odour to sensitive receptors. Wind speed and direction will determine which receptors will be affected and at what frequency.
- 4.6. Wind speed and direction data have been obtained from the nearest weather station at Alveston, (c. 10km southeast of the Site) between April 2013 and September 2022. The wind rose data denotes the predominant wind direction to be from the southwest, see Figure 4.1.
- 4.7. Figure 4.2 shows the predominant wind direction in relation to the Site and its surroundings.
- 4.8. Although Figure 4.1 shows predominant wind conditions at the Site, gusts and changes in wind direction can happen naturally, and as such, consideration should be made for all sensitive receptors close to the Site.





Figure 4.1 Alveston weather station wind rose

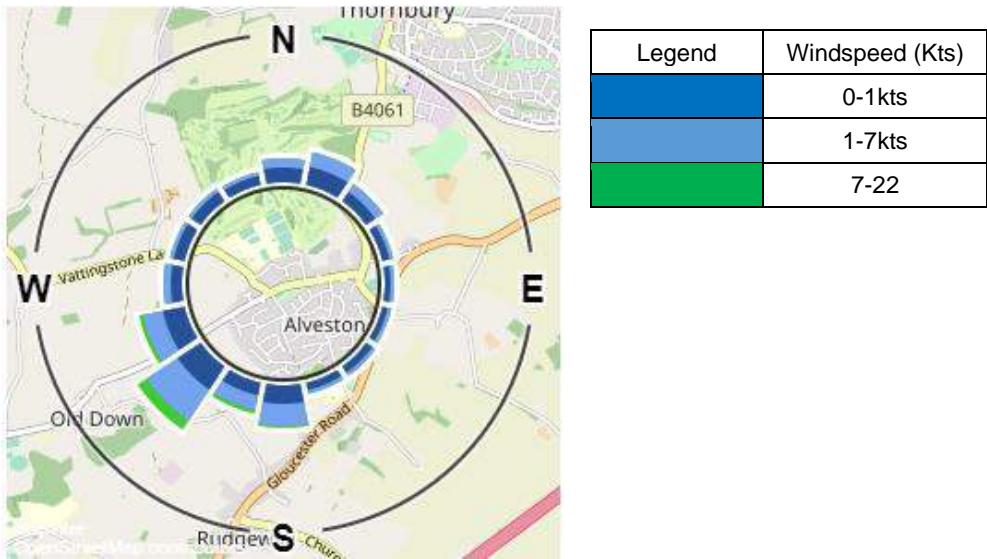
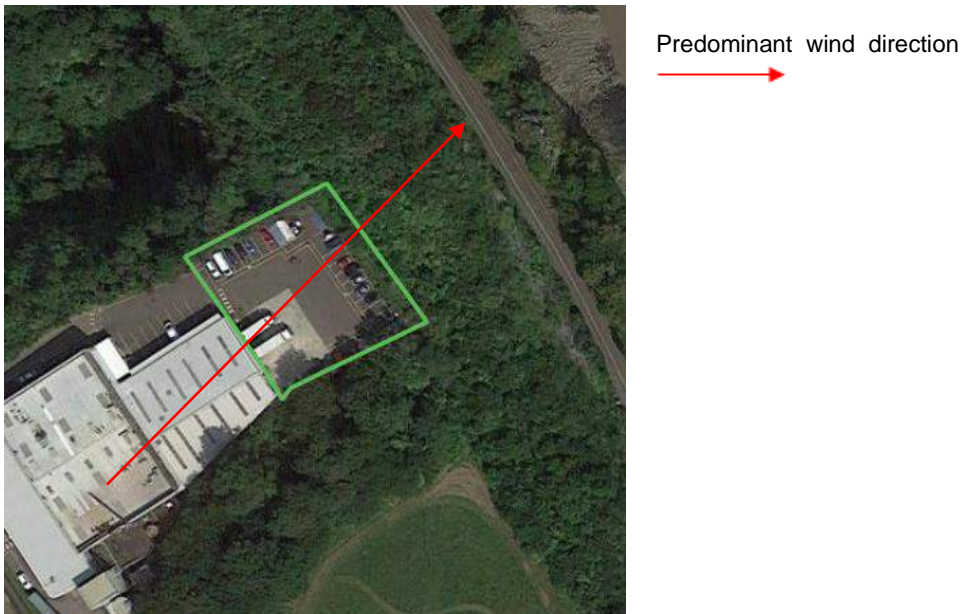


Figure 4.2 Wind direction in relation to the Site



**Wind Velocity**

- 4.9. Wind velocity will affect the distance an odour emission will travel. Conversely, increased wind speed could also beneficially improve dispersion. However, those receptors closest to the Site are still at the highest risk of a negative impact.
- 4.10. As seen in Figure 4.1 above the predominant wind direction is towards the north-east with average maximum wind speeds of 1-7kts per hour for short periods.

**Air Temperature**

- 4.11. Warm air may carry odours upwards by convection for their dispersion away from the Site. Warm weather will encourage the onset of increased biodegradation of temporarily stored wastes, therefore, any prolonged spells of high temperatures will increase odour potential.



### Adverse Weather Conditions

- 4.12. Unusual weather conditions may increase the risk of odour emissions from the Site. Site staff will be vigilant to unusual trends in weather forecasts which may indicate strong winds or extremes of temperatures which may cause a problem.
- 4.13. The types of weather conditions which may impact on odour generation and emissions and their appropriate contingency actions are detailed in Section 8.

### Sensitive Receptors

- 4.14. The distance from the Site boundary to sensitive receptors plays an important role in the potential impact experienced from odour. Receptors closest to the boundary are likely to be most affected.
- 4.15. This Odour Management Plan identifies receptors within 1km of the Site that may be sensitive to odour emissions, see Sensitive Receptor Plan, Drawing No. 21/012h 003.
- 4.16. A summary table of receptors, including the direction and distances from the Site boundary to the boundary of sensitive receptors is provided in Table 4.1 Sensitive receptors.

**Table 4.1 Sensitive receptors**

Ref	Receptor	Description	Direction from Site boundary	Distance from Site boundary to receptor boundary (m)
1	Broadleaved Woodland	Protected Habitat	North, east, south	0
2	Gloucester to Newport line	Trainline	East	35
3	Bulwark Camp	Historic Monument	South	40
4	River Wye (SSSI, SAC)	Protected Habitat	East	60
5	Alpha Road housing	Residential	Southwest	95
6	Ed's Auto's Car Repair	Commercial	West	100
7	Bulwark Industrial Estate	Industrial	West	100
8	Beaufort Quarry	Habitat	Northeast	105
9	Ancient Woodland	Protected Habitat	Northwest	135
10	Pennsylvania Fields (SSSI)	Protected Habitat	East	185
11	Mill Lane Industrial Estate	Industry	North	200
12	Marten Road housing	Residential	Northwest	230
13	Bulwark Road	Public highway	West	350
14	St Christopher's	Church	Southwest	375
15	Pembroke Primary School	School	West	395
16	Allotments	Recreational	North	425
17	Warren Slade and Park	Recreational	Southeast	480
18	Chepstow Athletics Club	Recreational	West	505
19	The Brewers	Commercial	South	520
20	Bulwark Park	Recreational	Northwest	580
21	St Marys Primary School	School	Northwest	595
22	Bulwark Community Centre	Recreational	Southwest	620
23	Chepstow Cemetery	Cemetery	West	625
24	Bridget Drive	Residential	Northeast	675



Ref	Receptor	Description	Direction from Site boundary	Distance from Site boundary to receptor boundary (m)
25	Thornwell Primary School	School	South	675
26	Chepstow Train Station	Train Station	North	775
27	A48	Public Highway	Northwest	860

- 4.17. The woodland to the north, east and south is broadleaved woodland and is not recorded as containing protected species. Immediately west of the Site is land controlled by the Operator used to operate laundry services.
- 4.18. The following nearby protected habitats are designated for the following reasons:
- The River Wye, a Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) comprises of species rich saltmarshes and grassland that provides good connectivity for otters. The River Wye is home to a number of protected species including, freshwater fish such as the Atlantic salmon and European Bullhead.
  - Pennsylvania fields SSSI is designated for its biological interest, being an area of brackish pastureland and overlying alluvial soils alongside the lower tidal part of the River Wye.
  - Beaufort Quarry a former working quarry which was surrendered in 2006 and has undergone ecological development to become a local wildlife site.
- 4.19. As seen in Figure 4.2, the predominant wind direction blows towards receptors northeast of the Site. Given the majority of sensitive receptors are located upwind (southwest) of the Site, the effect of odour on these receptors is likely to be negligible. Receptors that are considered sensitive which are northeast of the Site include Residential Dwellings on Bridget Drive, are 675m away from the Site and odour has a negligible risk of causing nuisance at the receptor.
- 4.20. In accordance with NRW's H4 guidance receptors considered to have the highest sensitivity to odour include, domestic residencies or pubs with beer gardens, while industrial units are considered to be of lower sensitivity.
- 4.21. The majority of receptors which are most sensitive to odour, for example schools. Residential housing and beer gardens are more than 200m upwind from the Site. This significantly diminishes, though does not eliminate potential impacts of odour emissions from the Site at these receptors.



## 5. Risk assessment matrix

- 5.1. The Site has the potential to generate odour impacts from the short-term storage of 'offensive' washroom waste. Nearby receptors as identified in Section 4, have the potential to be adversely impacted by odour. The potential impact has been assessed using the below risk assessment matrix.

### Odour Intensity

- 5.2. The odour intensity scale provides a consistent reference point for monitoring and reporting of odour by different individuals, see Table 5.1 Odour intensity.

**Table 5.1 Odour intensity**

Odour Intensity	Criteria
Negligible	No detectable odour
Low	Faint odour (barely detectable)
Moderate	Moderate odour easily detectable while walking (possible interference)
High	Strong odour (bearable, but offensive)
Severe	Very strong odour (almost unbearable)

### Risk Matrix

- 5.3. The assessment of the risk of odour emission at a given odour intensity will be carried out using the matrix in Table 5.2 Risk matrix.

**Table 5.2 Risk matrix**

		Sensitivity		
		Low	Medium	High
Intensity	Negligible	Negligible	Low	Low
	Low	Low	Low	Medium
	Moderate	Low	Medium	Medium
	High	Medium	Medium	High
	Severe	Medium	High	Very High

- 5.4. Changes to odour sources or conditions will mean a change in the risk of an odour emission. The Odour Management Plan should be reviewed whenever the Site undergoes an operational change which could impact the risk of odour emission.



## 6. Odour management and monitoring

- 6.1. The Site is operated in accordance with an Environmental Permit. The requirements of the Permit are implemented via an EMS.

### Training

- 6.2. Training will be given to all relevant persons to deliver the odour prevention measures detailed within this Odour Management Plan. This training is delivered or arranged by the Manager of the Site.
- 6.3. Refresher training will be provided to ensure staff remain competent:
- Where new odour prevention measures are to be implemented.
  - Following identification of procedures not being followed.

### Odour Control

- 6.4. Limiting odour from the waste storage activities can be most successfully achieved through employing effective site management and good general housekeeping practice. This way odours can be prevented from developing.
- 6.5. Odour will be controlled through implementation of effective waste acceptance and storage which are outlined below. The effectiveness of these control measures will be assessed during monitoring.

### Housekeeping

- 6.6. Regular cleaning of waste storage areas including waste storage bins will be carried out to prevent odour generation from residual waste. It is considered unlikely the storage bins will contain residual waste; residual waste is any waste left in the storage bins after emptying. Waste is stored collectively in bags meaning it's unlikely any residual pieces of waste will be left. Storage bins are checked they are completely empty before collection vehicles leave the Site.

### Waste Acceptance

- 6.7. Rigorous control of wastes accepted for collection to the Site is required. Wastes which are identified to have a high-severe odour intensity are rejected in line with the Waste Acceptance and Rejection procedures outlined in the EMS. Operatives collecting the waste are employed by the Operator and trained to identify material which cannot be accepted.
- 6.8. Waste is thoroughly inspected at collection and will receive a secondary inspection upon arrival to the Site. Waste with a high/severe odour potential discovered upon arrival at the Site, are placed in the Waste Quarantine Area and removal of the waste is arranged.
- 6.9. If the Site reaches its storage capacity the Operator will not accept any further waste.

### Waste Storage

- 6.10. The storage of offensive waste has the potential to develop odour. Waste is stored on Site in small quantities, no more than fifty tonnes of waste will be stored at any one time. In accordance with appropriate measures guidance for healthcare waste 'offensive waste' will be stored for no longer than 7 days, however, waste is typically removed within 48 hours.
- 6.11. Waste storage bin lids will remain closed at all times. Closed bins will help to prevent the release of any odour.
- 6.12. The integrity of waste storage bins is checked on a regular basis to ensure they are in good condition.



#### Storage Capacity

- 6.13. Incoming waste is accompanied by Waste Transfer Notes which allows for the volume of incoming waste to be tracked. No more than fifty tonnes of waste will be stored on Site at any one time.
- 6.14. Waste will not be stored for longer than the respective storage time (see Table 3.1). However typically waste will arrive and leave on the same day. This limits the risk of waste being stored for long periods, preventing odours from developing.

**The source-pathway-receptor linkages for the Site are presented in**



- 6.15. Table 6.1. The table also presents the control measures to be implemented to prevent odour emissions reaching a receptor.


**Table 6.1 Source-Pathway-Receptor and odour control measures**

Source	Pathway	Receptor	Impact	Odour Control Measures
Imported waste	Atmospheric dispersion via air transport then inhalation.	Nearby receptors, predominately industrial workers, see Table 4.1 Sensitive receptors.  Habitat receptors not sensitive to odour.	Malodour may cause nuisance / disruption to workers at nearby industrial sites.  Prolonged malodour could cause loss of working time to businesses and their clients.	All incoming waste will be subject to strict Waste Acceptance Procedures.  Waste will be inspected upon collection from a customer site. Any waste which is deemed to be excessively odorous will be rejected and not collected.  Waste receives a second inspection upon arrival on Site. If the waste is deemed to be excessively malodorous the waste will be rejected (if driver still present) or quarantined and removed from Site as soon as possible.  All Site operatives will be given the appropriate training in managing waste to prevent significant odour emissions. Training will be given to all personnel responsible for managing waste on Site.
Waste storage	As above	As above	As above	'Offensive' waste will be stored for a <b>maximum</b> of 7 days.  Waste is stored separately, in secure storage bins. Offensive waste is stored in a sealed bin with a lid.  The Site will regulate the waste activity to ensure that: <ul style="list-style-type: none"> <li>- Waste capacity is not exceeded.</li> <li>- Waste is not stored for longer than the maximum storage time (Table 3.1)</li> <li>- there are no emissions (including odour).</li> </ul> Regular cleaning of waste storage areas and waste storage bins is carried out to prevent the generation of odour.  Waste storage bins will be emptied in their entirety using a first-in, first-out principle to ensure stock rotation and prevent odour developing.  These checks are recorded on the Inspection Checklists as part of the regular inspections.  (Usual operation of the Site will mean that 'offensive' waste will likely be stored for c.1 day).





Source	Pathway	Receptor	Impact	Odour Control Measures
Waste transfer of odorous waste.	As above	As above	As above	Above preventative measures will limit the risk of stored waste producing more intense odour.  All offensive waste entering/leaving the Site will be bagged/ otherwise enclosed.



### **Odour Monitoring**

- 6.16. Sniff testing will be carried out weekly or as necessary (i.e., increased regularity should the management have reason to suspect odorous emissions from the Site). Sniff testing will be carried out both routinely, to ensure odour is under control, and in response to specific complaints.
- 6.17. Routine monitoring will be completed and recorded weekly on the Odour Monitoring Form, see Appendix 3 Odour Monitoring Form. Continuous monitoring will be undertaken by Site Operatives while undertaking their duties on Site. This continuous monitoring is not recorded unless in the event of an odour emission.
- 6.18. To prevent odour adoption (or odour 'fatigue'), a suitably trained member of staff will undertake monitoring at the beginning of the day. Monitoring will be carried out immediately upon arrival to the Site at specified points within the Site boundary.
- 6.19. The assessor will ensure they do not:
  - Smoke or consume flavoured food or drink for at least 30 minutes before the assessment.
  - Consume confectionary or soft drinks immediately before the assessment.
  - Apply scented toiletries, such as perfumes or aftershave immediately before an assessment.
- 6.20. Monitoring will be completed with due regard of meteorological conditions on the day, forecasted conditions, potential odour sources and the location of sensitive receptors.
- 6.21. Extreme weather conditions (high winds, increased temperatures etc) may affect potential odour pathways and increase odour emissions. Therefore, weather conditions will also be recorded.
- 6.22. Details of weather monitoring shall be recorded, including weather conditions and actions on the Odour Report Form, see Appendix 1 Inspection Checklist. Records will be kept in the Site office and will be updated weekly, for the following week.

### **Contingency Planning**

- 6.23. Should the odour controls fail, acceptance of waste will cease, and the odorous material taken off site for disposal at a suitably licenced waste management facility as soon as possible.
- 6.24. Should the failure be identified to be because of a procedural failure, this Odour Management Plan will be reviewed and updated to account for the necessary change.



## 7. Incidents and emergencies

- 7.1. Operators must consider what incidents or emergencies might adversely affect the control of odour pollution to plan and take appropriate steps to reduce the likelihood of the incident occurring, minimise any impacts in the event the incident were to occur, and recover control of the process as quickly as possible.
- 7.2. It is not necessary to consider events which are either very unlikely to occur or where odour would be a minor element of the overall environmental impact. For example, if there were to be a major environmental incident in the area that affected the Site and prevented staff from getting to work, then odours would be a relatively minor aspect of the overall disruption and environmental impact.
- 7.3. However, events that are uncommon but reasonably foreseeable which could affect the running of the Site and cause odour problems should be addressed e.g., collections of loads may be affected from time to time or staff (internal and external) may be unavailable for some reason e.g., illness.

### **Abnormal Meteorological Conditions**

- 7.4. Should meteorological conditions prevent delivery or dispatch vehicles, or staff arriving on site, emergency contingency plans will need to be followed to ensure the site can be remotely managed until the plant can return to operation under normal conditions.
- 7.5. The Site Manager and Site Operatives will undertake weather checks at the beginning of each week to ensure that any abnormal weather conditions for that week can be foreseen as much as possible and contingency arrangements can be put in place prior to any problems occurring on Site.
- 7.6. In the unlikely event that the Site must close to the reception of waste due to severe weather conditions, deliveries will be diverted to an alternative suitably authorised site for either recovery or disposal.
- 7.7. Recent summers have seen periods of high temperatures in excess of 32 degrees C which could potentially lead to an increase in odours. Additional odour monitoring will take place in periods of high temperatures.

### **Staffing**

- 7.8. The Site Manager ensures holidays are properly covered by staff; however, staff illness is unavoidable and unpredictable.
- 7.9. Staff will notify the Site Manager of absences as soon as possible to allow the Site Manager to plan accordingly.
- 7.10. In the event of staff absences, the Site Manager will consider the steps to be taken to ensure operations can continue without adversely affecting the control of odour pollution.
- 7.11. The operations on Site identified as the main sources of potential odour emissions are:
  - The handling of 'offensive'.
  - The storage of 'offensive' waste.
- 7.12. The minimum number of staff required on site to oversee the above processes from an odour control point of view is one staff member.
- 7.13. In the event of the absence of this staff member, the Site Manager will enact one or more of the following, depending on the duration of the absence:
  - Redeploy staff internally to ensure the Site is attended by the minimum number of suitably trained staff.
  - Employ a cover member of staff from an agency.
  - Reduce or cease waste imports to allow adequate waste management on Site.
  - Employ another member of staff to fulfil the role.



## **8. Reporting and complaints response**

- 8.1. The EMS on Site contains a procedure for responding and dealing with complaints. A complaints form will be available on Site and must be filled in and kept on file whenever a complaint is received in accordance with the EMS complaints procedure, see Appendix 2 Odour Complaints Form.

### **Engagement with the Community**

- 8.2. A Notice Board will be placed at the entrance of the Site and will contain the following information:
- The permit holder's name.
  - The operators name.
  - An emergency contact name and telephone number.
  - A statement that the Site is permitted by Natural Resources Wales.
  - The Environmental Permit Reference.
  - Natural Resources Wales number 0300 065 3000.
- 8.3. The provision of the above information will ensure that members of the community can contact the Operator should they be concerned about odour or wish to make a complaint. This also applies to any events that may happen when the Site is unmanned / not operational.

### **Liaison with Neighbours**

- 8.4. In the unlikely event of an odour emission, neighbouring businesses and residents will be contacted to advise them of the emission and the action being taken.

### **Reporting of complaints**

- 8.5. Following receipt of a complaint (either directly to an emergency contact or via the regulator), the complaint will be recorded on the Complaints Form, see Appendix 2 Complaints Form
- 8.6. The Complaints Form records:
- Who made the complaint.
  - What the complaint was about.
  - What has been done to resolve the issue and ensure it does not happen again.
- 8.7. Once recorded, any odour complaint will be investigated in accordance with the complaint's procedure. Investigation of complaints is the responsibility of the Site Manager.

### **Complaint Response**

- 8.8. An odour emission is considered to be the detection of a significant odour from the Site, at a nearby receptor.
- 8.9. Upon detection of an odour emission or receipt of a complaint regarding odour the following actions will be taken:
- Inspection of the reported location of the emission.
  - If an emission is identified, then remedial measures will be actioned in accordance with the details in Table 6.1.
  - If no emission is detectable, the investigation will identify the activities ongoing at the time the emission was reported to determine if the Site was likely to be the source of the emission.
  - If the investigation reveals an on-going cause of an emission, then that activity will cease/ waste removed from Site, if remedial measures cannot stop the emission.
  - Activities can resume if appropriate mitigation /remedial action is implemented to prevent any further emission.
  - An incident / complaint report form will be completed in accordance with the requirements of the EMS.



- 8.10. Inspection of the reported location will involve the routine assessment monitoring and further off-site monitoring. The further off-site monitoring should be downwind of the Site, progressing towards the Site boundary and then away from the Site in an upwind direction.
- 8.11. If it is not possible to conduct the assessment downwind of the Site, monitoring should take place in proximity of the closest receptor which is most sensitive to odour. This is likely to be residential dwellings on Alpha Road, southwest of the Site.
- 8.12. If odour has been detected to be present it will be assessed at the complaint location using the 'FIDOR' criteria as follows:
  - **Frequency** – is the odour intermittent or persistent; is there a history of complaints at this location.
  - **Intensity** – is the odour faint, moderate, strong, or very strong.
  - **Duration** - how long is the odour present at this location.
  - **Offensiveness** – provide a description of the odour; is it high moderate or low offensiveness.
  - **Receptor sensitivity** – is the odour present at a remote or highly sensitive location; is the odour plume localised or widespread.
- 8.13. If the odour is deemed not to be coming from the Site, the manager of the Site will contact the complainant to communicate the reasons for this and ensure they are satisfied.
- 8.14. In addition to the above the following actions will be taken following an incident that caused a significant emission from the Site or an emission that gave rise to pollution:
  - The Environment Agency will be notified in accordance with the notification form in the permit.
  - The complainant(s) (if any) will be notified promptly to inform the complaint is being investigated and estimated timescales for an update/remedy.
  - Record the reason and action to prevent recurrence.
  - Consider if the Odour Management Plan requires updating.
  - Update Odour Management Plan (if required).
- 8.15. If an emission has been caused by a procedure not being implemented correctly, staff will undertake repeat training on the implementation of this OMP and EMS training on the odour control procedure and site management. If the emission is identified to be a procedural fault, the relevant procedure will be updated and communicated to all relevant staff.
- 8.16. Should numerous complaints be received at the Site regarding the same issue, the cause of the complaint(s) will be investigated in accordance with the Emission Incident/Complaint Response above.
- 8.17. Where additional time is required to implement the appropriate corrective or preventative action the complainant will be contacted with details of the actions to be implemented and the estimated timescales for completion. The maximum response time for investigating the cause of the complaint and contacting a complainant will be two working days.



## Drawings

Drawing No. 21/012h 001	Permit Boundary Plan
Drawing No. 21/012h 003	Sensitive Receptor



Client: Elis UK Ltd

Chepstow Permit Boundary

Site:  
Bulwark Road,  
Bulwark Industrial Estate,  
Chepstow,  
NP16 5QZ

Date: 16 November 2022

Scale: 1:5,750

Reference: 21/012h 001

Drawn by: EG  
Checked by: KB



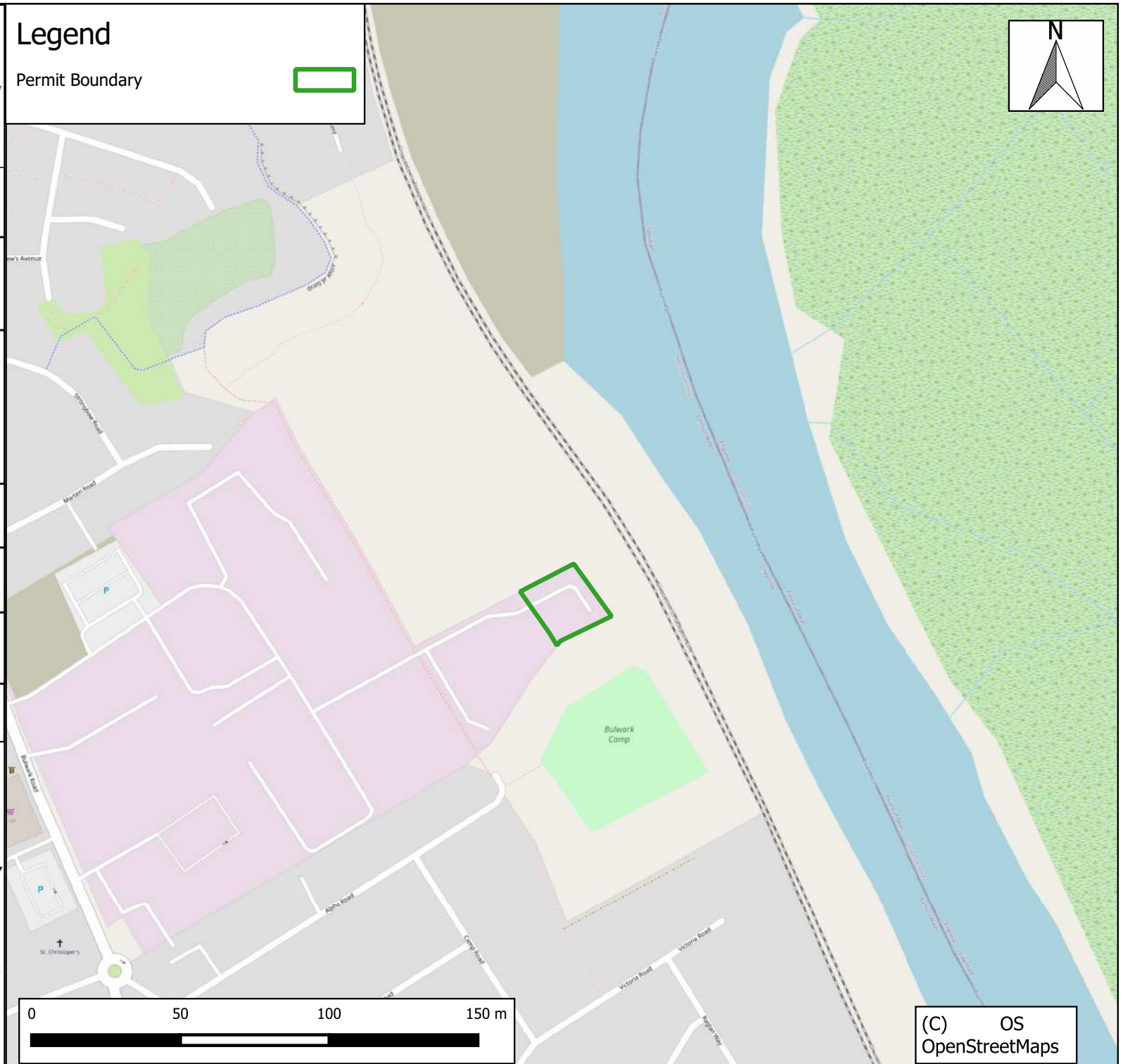
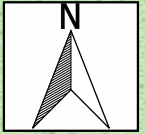
T 01952 879705 E [info@westburyenv.co.uk](mailto:info@westburyenv.co.uk)

A Agriculture House, Southwater Way  
Telford, Shropshire, TF3 4NR

W [www.westburyenv.co.uk](http://www.westburyenv.co.uk)

## Legend

Permit Boundary



(C) OS  
OpenStreetMaps





Client: Elis UK Ltd

Sensitive Receptors

Site:  
Bulwark Road,  
Bulwark Industrial Estate,  
Chepstow,  
NP16 5QZ

Date: 16 November 2022

Scale: 1:22500

Reference: 21/012h 003

Drawn by: EG  
Checked by: KB



T 01952 879705 E info@westburyenv.co.uk

A Agriculture House, Southwater Way  
Telford, Shropshire, TF3 4NR

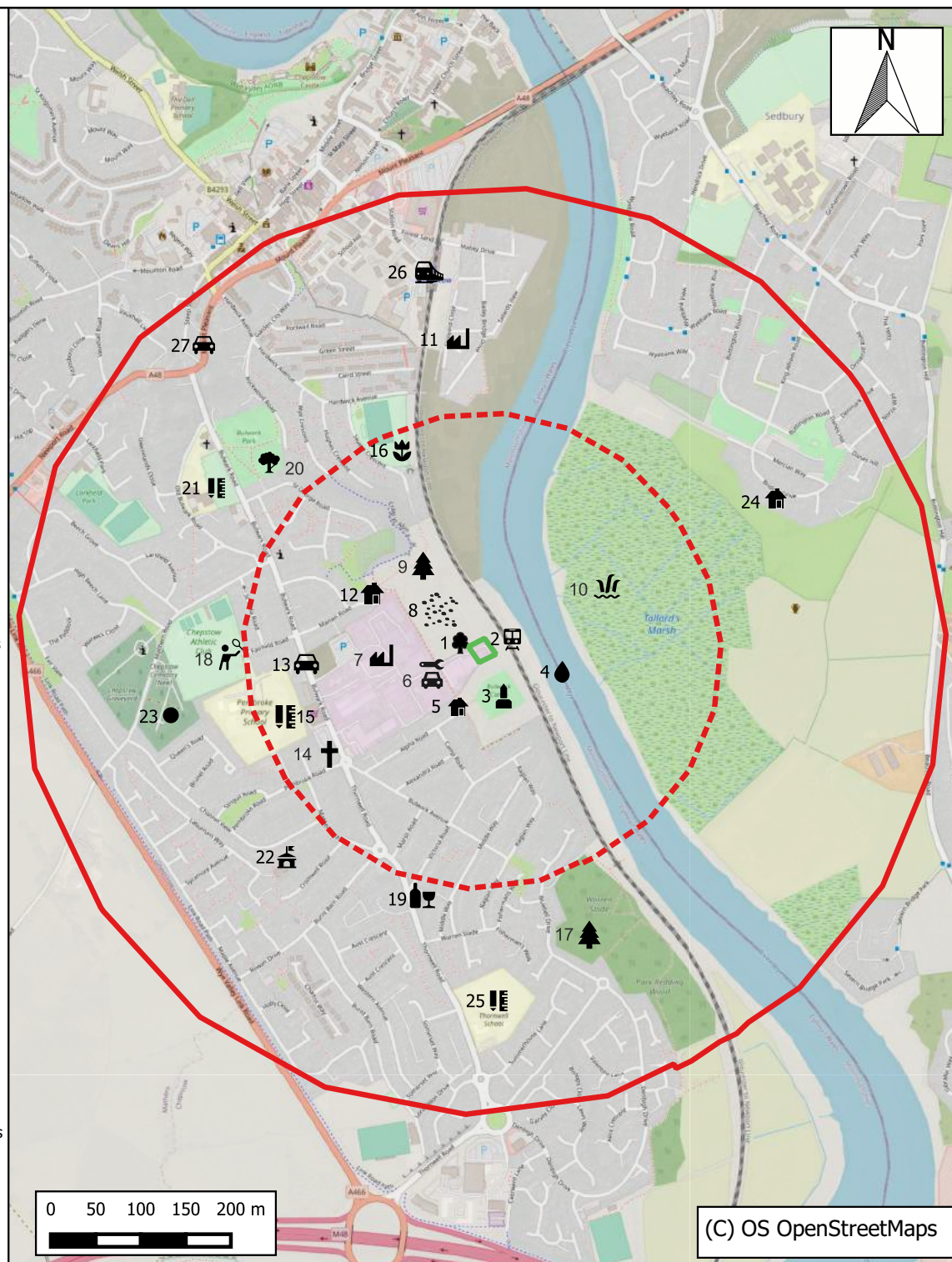
W www.westburyenv.co.uk

## Legend

- Permit Boundary
- 500m Buffer
- 1km Buffer

## Receptors

- 1. Broadleaved woodland
- 2. Trainline
- 3. Bulwark Camp
- 4. River Wye (SSSI)
- 5. Alpha Road Residential Dwellings
- 6. Ed's Autos Car Repair
- 7. Bulwark Industrial Estate
- 8. Beaufort Quarry
- 9. Ancient woodland
- 10. Pennsylvania Fields (SSSI)
- 11. Mill Lane Industrial Estate
- 12. Marten Road Residential Dwellings
- 13. Bulwark Road
- 14. St Christopher's
- 15. Pembroke Primary School
- 16. Allotments
- 17. Warren Slade and Park
- 18. Chepstow Athletics Club
- 19. The Two Brewers
- 20. Bulwark Park
- 21. St Marys Primary School
- 22. Bulwark Community Centre
- 23. Chepstow Cemetery
- 24. Bridget Drive Residential Dwellings
- 25. Thornwell Primary School
- 26. Chepstow Train Station
- 27. A48







**Appendix 1**  
Inspection Checklist



Daily Inspection Checklist			
Item for Visual Inspection	Aspects for Inspection	Checked Y/N	Remedial Action Required (Y/N, describe)
Litter	None present within waste storage areas		
	None present along or outside site boundaries (fencing etc.)		
Fire	Fire watch (No evidence of heating, smoke or fire)		
Dust emissions	No dust emissions escaping the boundary of the site		

Date: \_\_\_\_\_

Completed by: \_\_\_\_\_

Signature: \_\_\_\_\_



Weekly Inspection Checklist			
Item for Visual Inspection	Aspects for Inspection	Checked Y/N	Remedial Action Required (Y/N, describe)
Site Security	CCTV system is operational		
	Fencing around site perimeter is in good condition.		
	Lock on gated entrance is working and no signs of corrosion.		
Waste Storage	Waste storage areas are not exceeding the dimensions included in the Fire Prevention Plan.		
	Waste storage areas are free from build-up (litter, loose waste, fluff, dust).		
Weather	Weather forecast has been checked for coming week to determine if waste operations are likely to be impacted.		
Odour Monitoring	Odour monitoring using the sniff test and recorded on the Odour Monitoring Form.  (during periods of extreme warmer weather above 25 degree C odour monitoring will take place more frequently).		
Waste storage (Sanitary)	Waste stored on Site does not exceed maximum storage time (7 days).		

Date: \_\_\_\_\_

Completed by: \_\_\_\_\_

Signature: \_\_\_\_\_



Monthly Inspection Checklist			
Item for Visual Inspection	Aspects for Inspection	Checked Y/N	Remedial Action Required (Y/N, describe)
Impermeable surfacing	Free from cracks which may allow water to reach the ground below.		
Containers	Containers free from cracks which may result in loss of containment.		
Waste storage (Sharps, Medicine, Ancillary)	Waste stored on Site does not exceed maximum storage time (1 month).		
Fire	Fire alarm system is in good working order.		
Drains	Drains are free from blockages.		
Electrics	Wires are not frayed / damaged.		
	Sockets are not overloaded.		

Date: \_\_\_\_\_

Completed by: \_\_\_\_\_

Signature: \_\_\_\_\_



Annual Inspection Checklist			
Item for Visual Inspection	Aspects for Inspection	Checked Y/N	Remedial Action Required (Y/N, describe)
Site Security	The gates to the site are in working order and are lockable.		
Waste Storage Bins / Containers	No cracks or imperfections which could cause waste to escape.		
	Locks are working.		
Electrics	Electrics to be inspected and certified by a qualified electrician.		
Fire	Fire extinguishers in place and no obvious damage.		

Date: \_\_\_\_\_

Completed by: \_\_\_\_\_

Signature: \_\_\_\_\_



**Appendix 2**

Odour Complaint Form



## Odour Complaints Report Form

Odour Complaint Report Form	
Time and Date of Complaint:	Name and address of complainant:
Telephone number of complainant:	

Date of odour:	
Time of odour:	
Location of odour, if not at above address:	
Weather conditions (i.e., dry, rain, fog, snow):	
Temperature (very warm, warm, mild, cold, or degrees if known):	
Wind strength (none, light, steady, strong, gusting):	
Wind direction (e.g., from NE):	
Complainants' description of odour:	
<input type="radio"/> What does it smell like?	
<input type="radio"/> Intensity (see below):	
<input type="radio"/> Duration (time):	
<input type="radio"/> Constant or intermittent in this period:	
<input type="radio"/> Does the complainant have any other comments about the odour?	
Are there any other complaints relating to the site or to the location? (either previously or relating to the same exposure):	
Any other relevant information:	
Do you accept that odour likely to be from your activities?	
What was happening on site at the time the odour occurred?	
Actions taken:	
Form completed by:	Date:
Signed	

### Intensity

- |                    |                  |                     |                          |
|--------------------|------------------|---------------------|--------------------------|
| 0 No odour         | 2 Faint odour    | 4 Strong odour      | 6 Extremely strong odour |
| 1 Very faint odour | 3 Distinct odour | 5 Very strong odour |                          |



**Appendix 3**

Odour Monitoring Form





## Odour Monitoring Form

Date and time		Assessor	
Weather conditions and temp		Wind direction and strength	

Location	Time of test	Odour				
	Start/Finish	Y/N	Intensity	Extent	Description	Source
Site entrance						
Permit boundary						
Other (e.g. location closest to any complaint, if applicable)						
Action taken?						

Comments:	
Action required/ taken?	

Intensity Scale	0. No odour	1. Very faint odour	2. Faint odour	3. Distinct odour	4. Strong odour	5. Very strong odour	6. Extremely strong odour
Extent classification	I: Intermittent				P: Persistent		

Intensity of 3 or above, action must be taken to identify the cause and take preventative steps to prevent an odour emission.

Persistent intensity of 4 or above will require remedial action i.e. removal of waste from site.

Intermittent intensity of 6 will require investigative action with potential for remedial action (removal from site)



## **Appendix 3**

### Site Condition Report



## Site Condition Report, Part 1 February 2023

1.0 Site Details	
Name of the applicant	Elis UK Limited
Activity address	Washroom waste storage, Bulwark Trading Estate, Chepstow, NP16 5QZ (Site).
National grid reference	ST 53701 92756
Document reference and dates for Site Condition Report at permit application and surrender	This report, Site Condition Report, Part 1, February 2023.
Document references for site plans	Permit Boundary Plan Drawing No. 21/012h 001
2.0 Condition of the land at permit issue	
Environmental setting including: <ul style="list-style-type: none"> <li>• Geology</li> <li>• Hydrogeology</li> <li>• Surface waters</li> </ul>	<p><u>Superficial Geology:</u> The Site has no superficial geology beneath the Site.</p> <p><u>Bedrock Geology:</u> Langport Member, Blue Lias Formation and Charmouth Mudstone Formation (undifferentiated) - Mudstone and Limestone, Interbedded. Sedimentary Bedrock formed approximately 183 to 210 million years ago in the Jurassic and Triassic Periods. Local environment previously dominated by shallow lime-mud seas.</p> <p>The bedrock aquifer beneath the Site is classified as a Principal aquifer. The Site does not overlie a groundwater Source Protection Zone (SPZ).</p> <p>There are no surface water features on Site.</p>
Pollution history including: <ul style="list-style-type: none"> <li>• Pollution incidents that may have affected land</li> <li>• Historical land-uses and associated contaminants</li> <li>• Any visual/olfactory evidence of existing contamination</li> <li>• Evidence of damage to pollution prevention measures</li> </ul>	<p>No information on any pollution incidents has been identified which may have affected the state of the land.</p> <p>No visual or olfactory evidence of any existing contamination has been identified on the Site.</p>
Evidence of historic contamination, for example, historical site investigation, assessment, remediation, and verification reports (where available)	No records of historical site investigations, reports or remediation were available for this area of the site at the time of completing this Site Condition Report.
Baseline soil and groundwater reference data	N/A
Supporting information	N/A



<b>Site Reconnaissance Report (a site visit was not possible; therefore, this information is based on what has been reported to us by the Operator in February 2023)</b>	
Access arrangements	The Site is within Bulwark Trading Estate which can be accessed via Bulwark Road then via internal roads within the Industrial Estate.
Site layout including presence and condition of above and below ground buildings/structures etc.	<p>The wider Eils site is made up of a car park and large building where laundering services take place and waste is stored.</p> <p>The site boundary is surrounded with fencing and hedging.</p>
Evidence of disturbed land, discoloured soil or water, subsidence, above ground deposits etc.	<p>The Site is concrete surfaced and so there is no evidence of disturbed land.</p> <p>There is no evidence of disturbed land or soil and water discolouration in the land.</p>
Vegetation type and signs of distress or absence where it might be expected	<p>The Site is surrounded by hedging and restored ancient woodland.</p> <p>There is no evidence of stress in the vegetation present around the boundary of the permitted area.</p>
Significant odours from the land	No odours were detected from the Site itself or the materials on the Site.
Liquid discharges from the site	There are no point source liquid discharges from the Site.
Direction and flow of surface water run-off and presence of ponding	The Site has impermeable concrete surfacing. Any surface water is contained with kerbing which has been placed so any surface water runoff is contained within the waste storage areas.
Land uses in the vicinity of the site	<p>Surrounding land-use includes the wider Elis laundry site, an industrial estate to the south and west of the Site. A trainline runs approximately 20m northeast of the Site and the river Wye 65m east of the Site.</p> <p>There is also a playing field 30m southeast of the Site.</p> <p>The closest residential housing is approximately 25m south of the Site.</p>
Presence and condition of surface water features	<p>There are no surface water features present within the Site boundary.</p> <p>The river Wye is approximately 65m east of the Site.</p>
Evidence of any accidental/uncontrolled releases at the site (previous or current)	There is no evidence of any pollution on the Site from any accidental or uncontrolled releases.
Identify potential access constraints e.g., overhead cables, location of machinery, operations at the site.	No potential access constraints were identified.
Evidence of historic contamination, for example, historical site investigation, assessment, remediation, and verification reports (where available)	No records of historical site investigations, reports or remediation were available for the area of this Site.
Baseline soil and groundwater reference data	No baseline soil or groundwater reference data is available.



<b>3.0 Permitted activities</b>	
Permitted activities	Storage and transfer of washroom wastes only (subject of this permit application).
Non-permitted activities undertaken	The Site operates a commercial laundry service as their main business activity.
Document references for:	Permit Boundary Plan Drawing No. 21/012h 001



## **Appendix 4**

### Environmental Risk Assessment



## Environmental Risk Assessment

- 1.1. The waste operations of storage and transfer of washroom waste are carried out at Bulwark Trading Estate, Chepstow, NP16 5QZ (the Site).
- 1.2. This Environmental Risk Assessment is based off the following Site conditions and receptors:
- There is an industrial estate approximately 0m west of the Site
  - The nearest residential housing is approximately 95m southwest from the Site boundary.
  - Chepstow trainline passes approximately 35m east of the Site boundary.
  - The river Wye, a special area of conservation designated for a number of species present, including otters and freshwater fish such as the Atlantic salmon and European Bullhead is approximately 60m east of the Site.
  - Pennsylvania Fields a Site of Special Scientific Interest (SSSI) designated for its biological interest being an area of brackish pastureland overlying alluvial soils alongside the lower tidal part of the river Wye, which is the only example of this habitat in Gloucestershire is 185m east of the Site.
  - Beaufort Quarry a former working quarry which was surrendered in 2006 and has undergone ecological development to become a local wildlife site is 105m north of the Site.
  - Lower Wye gorge (England) SSSI designated for its biological interest, particularly the sites transition from saltmarsh to valley woodland bordering the tidal River Wye is 3km north of the Site. The area is also a breeding site for protected birds such as Kestrels.
  - The Severn Estuary (England) SSSI designated for its biological and geological features including littoral sediment habitats and aggregations of non-breeding birds is 1.5km east of the Site.
  - Pierce, Alcove and Piercefield Woods SSSI designated for its woodland species and geological variation is 1.2km north of the Site.

Receptor	Source	Harm	Pathway	Probability of occurring	Consequence	Magnitude of risk	Justification for magnitude	Risk Management	Residual risk
Local human population	Releases of particulate matter (dusts) and infectious micro-organisms (bioaerosols).	Harm to human health - respiratory irritation and illness.  Nuisance dust	Air transport then inhalation /deposition	Low	Medium	Low	The is negligible risk of dust generation from the waste activities proposed.	The Site will follow strict waste acceptance procedures  Dusty wastes will not be accepted to site and will be rejected in accordance with the waste	Negligible



Receptor	Source	Harm	Pathway	Probability of occurring	Consequence	Magnitude of risk	Justification for magnitude	Risk Management	Residual risk
								rejection procedure  All waste will be double bagged and stored in sealed containers.	
Local human population, livestock and wildlife	Litter	Nuisance, loss of amenity and harm to animal health	Air transport then deposition.	Low	Medium	Low	The waste types have low litter potential.	As above	Negligible
Local human population	Waste, litter, and mud on local roads	Nuisance, loss of amenity, road traffic accidents.	Vehicles entering and leaving site.	Low	Low	Low	Road safety, local residents often sensitive to mud on roads.  Waste does not pose a risk of mud.	The proposed waste to be accepted will not be of a muddy nature.  Waste is stored in sealed bins  The site is impermeable paving and has minimal risk of transferring mud to vehicles  Vehicle movements will be daily rather than hourly.	Very low





Receptor	Source	Harm	Pathway	Probability of occurring	Consequence	Magnitude of risk	Justification for magnitude	Risk Management	Residual risk
Local human population	Odour	Nuisance, loss of amenity.	Air transport then inhalation.	Medium	Medium	Medium	Waste has potential for odour.	<p>The waste arrives on Site double bagged and is stored in a sealed bin. The triple containment of the waste will provide mitigation against odour.</p> <p>Offensive waste will be stored for less than 7 days. Reducing the risk of odour developing.</p> <p>Waste storage bins are cleaned regularly in line with the sites management system</p> <p>The requirements of an odour management plan will be implemented on Site.</p>	Low



Receptor	Source	Harm	Pathway	Probability of occurring	Consequence	Magnitude of risk	Justification for magnitude	Risk Management	Residual risk
Local human population	Noise and vibration	Nuisance, loss of amenity, loss of sleep.	Noise through the air and vibration through the ground.	Low	Medium	Low	Local residents often sensitive to noise and vibration.  Waste activities are unlikely to produce noise.	Vehicles accessing the site will be well maintained to reduce the production of excessive noise from vehicle movements.  The site will employ a no idling policy.  Vehicles already access the Site for the operator's laundry activities, the proposed waste activities will not increase noise.	Low
Local human population	Scavenging animals and scavenging birds or pests.	Harm to human health - from waste carried off site and faeces. Nuisance and loss of amenity.	Air transport and over land	High	High	High	Permitted wastes include non-infectious materials and may attract scavenging animals, birds or pests.	All waste will be double bagged and in sealed containers.  The storage bins have sealed lids preventing access to	Low



Receptor	Source	Harm	Pathway	Probability of occurring	Consequence	Magnitude of risk	Justification for magnitude	Risk Management	Residual risk
								scavenging birds or pests  Waste will be stored for less than 1 month.	
Local human population	Flooding from site	If waste is washed off site, it may contaminate buildings / gardens / natural habitats downstream.	Floodwaters	Low	Medium	Low	Hazardous wastes washed off site will add to the volume and hazard of the local post-flood clean-up workload.	All waste will be double bagged and in sealed containers.	Very low
Local human population and / or livestock after gaining unauthorised access to the waste operation	All on-site hazards: wastes; machinery and vehicles.	Bodily injury	Direct physical contact	Low	Low	Low	No plant associated with the waste activity will be stored on site.  Wastes do not pose a big short-term hazard.	No machinery is involved in the waste operations only transport vehicles  All waste will be double bagged and in sealed containers.	Very low
Local human population and local environment.	Arson and / or vandalism causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff, firefighters or arsonists/vandals. Pollution of water or land.	Air transport of smoke. Spillages and contaminated firewater by direct run-off from site and via surface water drains and ditches.	Medium	Medium	Medium	Waste types are non-hazardous, and a medium risk is estimated.	Site will be secure at all times.  All waste will be double bagged and in sealed containers.	Low



Receptor	Source	Harm	Pathway	Probability of occurring	Consequence	Magnitude of risk	Justification for magnitude	Risk Management	Residual risk
Local human population and local environment	Accidental fire causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff or firefighters. Pollution of water or land.	As above	Low	Medium	Low	Risk of accidental combustion of waste is low.	As above.  Permitted activities do not include the burning of waste.	Low
All surface waters close to and downstream of site.	Spillage of liquids, leachate from waste, contaminated rainwater run-off from waste.	Acute effects: oxygen depletion, fish kill and algal blooms  Chronic effects: deterioration of water quality	Direct run-off from site across ground surface, via surface water drains, ditches etc.  Indirect run-off via the soil layer	Low	Medium	Low	Wastes are non-hazardous.  Harm is likely to be temporary and reversible.	All waste will be double bagged and in sealed containers.  Waste will be stored on concrete or within a building.  The EMS will contain a waste acceptance procedure. This procedure will be implemented to ensure liquid wastes are not accepted onto Site and contravening wastes are removed.	Very low
Abstraction from watercourse	As above	Acute effects, closure of	Direct run-off from site across ground surface,	Low	Low	Low	As above. Watercourse must have	As above	Very low



Receptor	Source	Harm	Pathway	Probability of occurring	Consequence	Magnitude of risk	Justification for magnitude	Risk Management	Residual risk
downstream of facility (for agricultural or potable use).		abstraction intakes.	via surface water drains, ditches etc. then abstraction.				medium / high flow for abstraction to be permitted, which will dilute contaminated run-off.		
Groundwater	As above	Chronic effects: contamination of groundwater, requiring treatment of water or closure of borehole.	Transport through soil/groundwater then extraction at borehole.	Low	Low	Low	As above.	As above	Very low
Local human population	Contaminated waters used for recreational purposes	Harm to human health - skin damage or gastro-intestinal illness.	Direct contact or ingestion	low	Low	Low	Unlikely to occur.	Waste will be triple contained.  Site will be secured to unauthorised human entry.	Very low
Protected sites - European sites and SSSIs or nearby habitats and wildlife.	Any	Harm to wildlife through toxic contamination, nutrient enrichment, smothering, disturbance, predation etc.	Any	Low	Low	Low	The Site is located 120m from Pennsylvania Fields, Sedbury Site of Special Scientific Interest (SSSI) which is designated for its biological interest. The Site is not	Waste will be triple contained.  A negligible amount of dust will be produced from the waste types.  Any surface water is contained within the Site	Negligible



Receptor	Source	Harm	Pathway	Probability of occurring	Consequence	Magnitude of risk	Justification for magnitude	Risk Management	Residual risk
							within 1km of a European site.  Restored Ancient Woodland borders the Site boundary.	due to the Sites kerbing.  It is considered highly unlikely any receptors further than 50m will be affected by the waste operations	



## **Appendix 5**

### Environmental Management System (EMS)



## Procedures and Forms

Elis UK Limited



PROVIDING SOLUTIONS, ENSURING COMPLIANCE

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T 01952 879705 E [info@westburyenv.co.uk](mailto:info@westburyenv.co.uk)

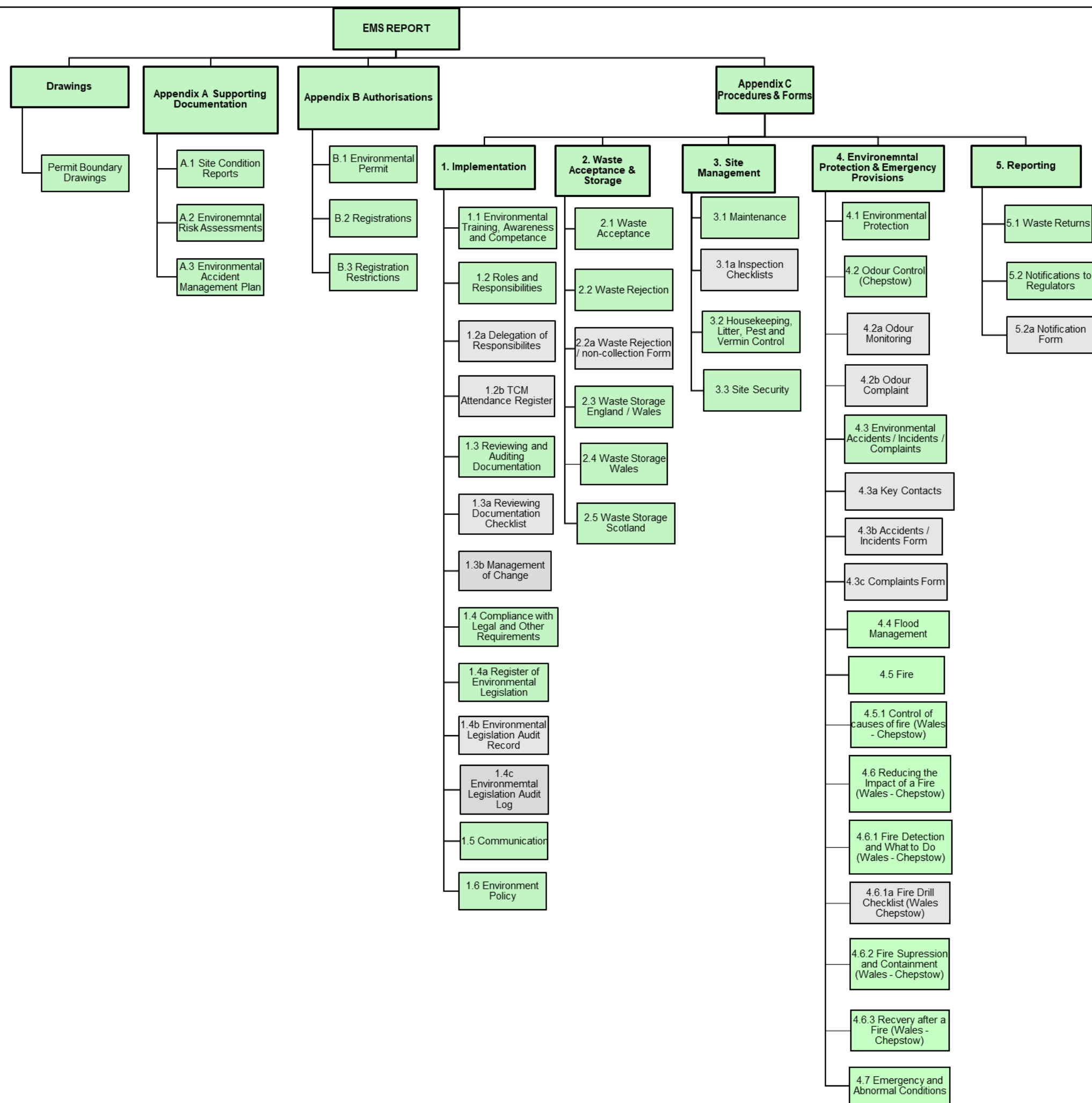
A Agriculture House, Southwater Way  
Telford, Shropshire, TF3 4NR

W [www.westburyenv.co.uk](http://www.westburyenv.co.uk)



## Document Control Table

Project Reference	21/012f
Project Title	Environmental Management System
Document Title	EMS: Appendix C - Procedures and Forms, Version 2
Document Issue Date	01 March 2023
Client	Elis UK Limited
Status	Issued



# Procedure and Form Directory

## 1. Implementation

Environmental Training, Awareness and Competence  
Roles and Responsibilities  
Form No. 1.2a Delegation of Responsibilities  
Form No. 1.2b TCM Attendance Register  
Reviewing and Auditing Documentation  
Form No. 1.3a Reviewing Documentation Checklist  
Form No. 1.3b Management of Change  
Compliance with Legal and other Requirements  
Form No. 1.4a Register of Environmental Legislation  
Form No. 1.4b Environmental Legislation Audit Record  
Form No. 1.4c Environmental Legislation Audit Log  
Communication  
Environmental Policy

## 2. Waste Acceptance and Storage

Waste Acceptance  
Waste Rejection  
Form No. 2.2a Waste Rejection / non collection  
Waste Storage England  
Waste Storage Wales  
Waste Storage Scotland

## 3. Site Management

Maintenance  
Form No. 3.1a Inspection Checklists  
Housekeeping, Litter, Pest, and Vermin Control  
Site Security

## 4. Environmental Protection & Emergency Provisions

Environmental Protection  
Odour Control (Wales)  
Form No. 4.2a Odour Monitoring  
Form No. 4.2b Odour Complaint  
Environmental Accidents / Incidents / Complaints  
Form No. 4.3a Key Contacts  
Form No. 4.3b Accident / Incident-Form  
Form No. 4.3c Complaints Form  
Flood Management  
Fire  
Control of causes of fire (Wales - Chepstow)

Reducing the Impact of a Fire (Wales - Chepstow)

Fire Detection and What to Do (Wales - Chepstow)

Form No. 4.6.1a Fire Drill Checklist (Wales – Chepstow)

Fire Suppression and Containment (Wales - Chepstow)

Recovery after a Fire (Wales - Chepstow)

Emergency / Abnormal Conditions


## **5 Reporting**

Waste Returns

Notifications to Regulators

Form No. 5.2a Notification Form

# 1. Implementation

	<b>ENVIRONMENTAL MANAGEMENT SYSTEM- UK</b>	<b>EM 1.1</b>
<b>Environmental Training, Awareness and Competence</b>		
<b>LEGAL REQUIREMENT:</b> Environmental permitting regulations 2016.		
<i>Purpose: To ensure that all employees with responsibilities under this EMS are trained and/or qualified to undertake their duties and fulfil their responsibilities safely, efficiently, and effectively and with due regard to the environment.</i>		
	<b>RESPONSIBLE PERSON</b>	<b>RECORD</b>
<b><u>Training</u></b>		
1. All new employees, including those transferring from elsewhere in the Company or returning to work after a break in employment, and temporary staff, shall receive induction training through the company training matrix. The induction includes: <ul style="list-style-type: none"> <li>• Introduction to Elis UK Limited and its operations.</li> <li>• Quality, Environment and Health and Safety Policy's and management systems.</li> <li>• The Employee's role as per the job description with particular consideration to:               <ul style="list-style-type: none"> <li>○ Any technical and operational responsibilities.</li> <li>○ Any quality, environmental and health and safety responsibilities.</li> <li>○ Any specific requirements related to product or service provision.</li> </ul> </li> <li>• The main hazards and control measures applicable to their place of work identified in accordance with Risk Assessments.</li> <li>• Emergency procedures and where to find them on site.</li> <li>• Site welfare facilities.</li> </ul>	Site Manager	
2. The Company Training Matrix should be completed for the employee and records updated when necessary.	Site Manager	Elis UK Ltd Company Training Matrix
3. Induction training should take place within the first month of appointment to a role.	Site Manager	
<b><u>Ongoing Awareness and Competence Training</u></b>		
4. Training assessment needs to be carried out for all permanent staff when commencing a new role and thereafter at least annually. The review takes account of: <ul style="list-style-type: none"> <li>• The skills, knowledge specified for the job.</li> <li>• Any specific operational or technical job responsibilities.</li> <li>• Any specific quality, health and safety and environmental job responsibilities.</li> <li>• The employees' current level of competence / performance in respect of these areas.</li> </ul>	Site Manager	Elis UK Ltd Company Training Matrix
This will be recorded on the Company Training Matrix.		
5. Identified training is agreed, sourced, priced, scheduled and included in the budget, as necessary. Training may be sourced internally or externally.		

		RESPONSIBLE PERSON	RECORD
6.	Refer to the Company Training Matrix to ensure all employees have received and continue to receive all relevant training.	Site Manager	Elis UK Ltd Company Training Matrix
7.	After completion of any training the employees record in the Company Training Matrix is updated.	Site Manager	Elis UK Ltd Company Training Matrix


## Environmental Training Checklist

*Purpose: To provide information on the training required for each member of staff, dependent upon the role of that member of staff.*

Role	Reference to Training Material	Main Topics to Cover
<b>Site Operative (Drivers)</b>	<b>2 Waste Acceptance and Storage</b> 2.1 Waste Acceptance 2.2 Waste Rejection 2.3 Waste Storage and Handling	Waste Carriers Licenses. Completing Duty of Care documentation (Waste Transfer Notes). Accepting permitted List of Waste codes and the Environmental Permit. Understanding non-permitted waste and waste information. Rejecting loads.
<b>Site Operative (General)</b>	<b>2 Waste Acceptance and Storage</b> 2.1 Waste Acceptance 2.2 Waste Rejection 2.3 Waste Storage and Handling	Waste Carriers Licenses. Completing Duty of Care documentation (Waste Transfer Notes). Accepting permitted List of Waste codes and the Environmental Permit. Rejecting loads. Storage of washroom wastes
	<b>3 Site Management</b> 3.1 Maintenance 3.2 Housekeeping 3.3 Site Security	Schedule for maintenance checklist and completing maintenance checklists. Reporting of infestations and general site tidiness. Reporting of unauthorised access / break-ins and what to do in the event of an alarm. How to remove waste from the Site.
	<b>4 Environmental Protection &amp; Emergency Provisions</b> 4.1 Environmental Protection 4.2 Environmental Accidents / Incidents 4.5 Emergency and Abnormal Conditions	Reporting complaints. Reporting of any environmental accidents / incidents. Recording of complaints.



<b>Site Manager (Training required in addition to above)</b>	<b>1 Implementation</b> 1.1 Environmental Training 1.2 Roles and Responsibilities 1.3 Reviewing Documentation 1.4 Compliance with Legal and other Requirements 1.5 Communication 1.6 Environmental Policy	Training requirements and staffing structure. Attendance requirements of Technically Competent Managers (TCM's) and recording of attendance. Delegating responsibilities during leave and TCM attendance. Reviewing supporting documentation in EMS to ensure they are up to date. Awareness of legal responsibilities.
	<b>2 Waste Acceptance</b> 2.1 Waste Acceptance 2.2 Waste Rejection 2.3 Waste Storage and Handling	Analysis of site investigation / waste information and further responsibilities for accepting and rejecting waste. Storage restrictions and requirements and compliance with restrictions.
	<b>3 Site Management</b> 3.1 Maintenance 3.2 Housekeeping 3.3 Site Security	Overseeing and regulating maintenance checklists. Receiving reports of infestation and resolving issues i.e., employing relevant contractors. Receiving reports of unauthorised access and undertaking the relevant actions.
	<b>4 Environmental Protection &amp; Emergency Provisions</b> 4.1 Environmental Protection 4.3 Environmental Accidents / Incidents 4.7 Emergency and Abnormal Conditions	Recording and dealing with complaints. Managing dust, mud, noise, odour, and surface water.
	<b>5. Reporting</b> 5.1 Waste Returns 5.2 Notifications	Completing and submitting Waste Returns. When and how to notify regulating bodies.

	ENVIRONMENTAL MANAGEMENT SYSTEM- UK	EM 1.2
Roles and Responsibilities		
LEGAL REQUIREMENT: Environmental permitting regulations 2016.		
<i>Purpose: To ensure the roles and responsibilities of personnel on the Sites covered by this EMS are identified and responsibilities (under the permits) of absent staff are appropriately delegated. To document the attendance of the Technically Competent Management (TCM) on the Site.</i>		
	RESPONSIBLE PERSON	RECORD
1. A list of the companies Technically Competent Managers (TCM) and which site they are responsible for is listed in Table 1.2.1	Site Manager	
2. A list of company Directors and other personnel is available in Table 1.2.2		
3. The attendance of the TCM is recorded in the TCM Attendance Register. These records will be made available to the appropriate regulator upon request.	TCM(s)	Form No. 1.2b TCM Attendance Register
4. If staff with specific responsibilities under the EMS procedures are due to be absent for a period of time, then their responsibilities need to be delegated to another member of staff. The delegation of these responsibilities should be recorded.	Site Manager	Form No. 1.2a Delegation of Responsibilities Form
5. Each site TCM is required to be on site for 20% of the operational hours to meet the requirements within the sites Environmental Permit.		

**Table.1.2.1. TCM Managers**

TCM Manager	Site Address
Alex Sohrabian	12 Colville Road, Acton, W3 8BL
Julian Wellesley	Park Lane, Handsworth, Birmingham, West Midlands, B21 8LE
Sean Goldsworthy	Bulwark Industrial Estate, Bulwark, Chepstow, Gwent, NP16 5QZ
Neil Boddington	Dundance Lane Pool, Camborne, TR15 3RA
Lauren Smith	1 Butterby Court, St Johns Road, Durham, Co Durham, DH7 8XN
Andrew Dawes	Holt Road, Fakenham, Norfolk, NR21 8BP
Robin Page	Dalgrain Road, Grangemouth, Stirlingshire, FK3 8EN
Eduarda Savazoni	144 North End Avenue, Portsmouth, PO2 8NS
Jon Holt	Stoney Lane, Rainhill, Merseyside, L35 9LW
Andrea Warrington	Portobello Road, Wakefield, West Yorkshire, WF2 7JH

**Table 1.2.2. Company Directors and other personnel**


Name	Role
Werner Dreyer	Director
Mark Leslie Franklin	Director
Gary Youngson	QSE Cluster Manager

**Form No. 1.2a Delegation of Responsibilities**

*Purpose: To ensure all responsibilities under the environmental authorisations are formally delegated to other members of staff in the event of staff absence.*

Site Address	
Name of employee to be absent	
Job title/role to be filled during absence	
Department	
Absence type e.g., maternity leave	
Name of employee covering absence's role	
Part/s of permit / EMS employee is responsible for	
Any other responsibilities the employee will be covering	
Length of time cover will be for	
Any additional training required to cover the responsibilities?	

[illegible]

	ENVIRONMENTAL MANAGEMENT SYSTEM- UK	EM 1.3
Reviewing and Auditing Documentation		
<b>LEGAL REQUIREMENT:</b> Environmental permitting regulations 2016.		
<i>Purpose: To ensure that relevant documents within this EMS are reviewed and/or audited in accordance with written procedures.</i>		
<p><b><u>Reviewing Documentation</u></b></p> <ol style="list-style-type: none"> <li>1. Reviewing of EMS Documents are undertaken in the event of an incident, non-conformance, non-compliance or as a result of a 'change'.</li> <li>2. A 'change' may include one or more of the following: <ul style="list-style-type: none"> <li>• Change (variation) to the environmental authorisations.</li> <li>• Change in environmental legislation.</li> <li>• Change in processes.</li> <li>• Change in equipment.</li> <li>• Implementation of cleaner technology.</li> </ul> </li> <li>3. The following documents are to be reviewed in the event of a 'change' using the Management of Change form: <ul style="list-style-type: none"> <li>• EMS Report.</li> <li>• Relevant Management Plans</li> <li>• Drawings.</li> <li>• Procedures and Forms.</li> </ul> </li> <li>4. The documents in Table 1.3.1 are to be reviewed annually.</li> </ol>	<p><b>RESPONSIBLE PERSON</b></p> <p>Site Manager</p> <p>Site Manager</p>	<p><b>RECORD</b></p> <p>Form No. 1.3b Management of Change</p> <p>Form No. 1.3a Reviewing Documentation</p>

**Table 1.3.1 Documents to be reviewed annually.**

Document	Location of Document	Person Responsible
Environmental Management System Report	Environmental Management System	Site Manager
Odour Management Plan	Environmental Management System – Appendix A Supporting Documentation, A.2	Site Manager
Form No. 1.4a Register of Legislation	Copy in Site Office. Environmental Management System - Appendix C Site Procedures and Forms	Site Manager

		RESPONSIBLE PERSON	RECORD
5.	The documents in Table 1.3.2 are to be reviewed every four years.	Site Manager	Form No. 1.3a Reviewing Documentation

**Table 1.3.2 Documents to be reviewed every four years.**

Document	Location of Document	Person Responsible
Fire Prevention Plan	Environmental Management System - Appendix A Supporting Documentation, A.3	Site Manager

		RESPONSIBLE PERSON	RECORD
6.	Reviews of the documents in the Table above will be recorded on the Reviewing Documentation form.	Site Manager / Director	Form No. 1.3a Reviewing Documentation
<b><u>Auditing Documentation</u></b>			
7.	<p>An annual audit of the Environmental Management System shall be carried out to ensure information within the Environmental Management System accurately reflects the operations and processes carried out within Elis UK Limited. Aspects to be considered within this audit should include:</p> <ul style="list-style-type: none"> <li>• Checks on the implementation of the requirements of the reports and procedures within the Environmental Management System.</li> </ul> <p>Checks on the records and forms kept in relation to procedures within the Environmental Management System. Particular attention should be given to:</p> <ul style="list-style-type: none"> <li>• The correct use of these documents.</li> <li>• The efficiency of processes in place to record information, with the view to improving efficiency. For example, any duplication in information recorded using forms or the format used to record information.</li> <li>• Inspection Checklists should be checked to identify any equipment that is being regularly repaired.</li> <li>• Records (e.g., Waste Transfer Notes) and forms kept in relation to Duty of Care and Waste Acceptance.</li> </ul>	Site Manager / Director / Consultant	

**Form No. 1.3a Reviewing Documentation Checklist**

*Purpose: To record when documentation within the Company EMS is reviewed / updated.*

Document	Completed By	Version Number Reviewed	Date of Review	Comments
Environmental Management System Report				
Form No. 1.4a Register of Legislation				
EMS, Appendix A Supporting Documentation, A.2 Odour Management Plan				
EMS, Appendix A Supporting Documentation, A.3 Fire Prevention Plan				

**Form No. 1.3b Management of Change**

*Purpose: To ensure necessary documents within the EMS are updated in the event of a 'change' or proposed 'change' within the company or a Site.*


Description of Change

**Review of Changes Required**

EMS Documents	Change Required? (Y/N)	Notes (justification as to why a change is required/not required)
EMS Report		
<b>Appendix A Supporting Information</b>		
A.1 Site Condition Reports		
A.2 Odour Management Plan		
A.3 Fire Prevention Plan		
<b>Appendix B Authorisations</b>		
B.2 Environment Agency Registrations		
B.3 Restrictions of Environment Agency Registrations		
<b>Appendix C Procedures and Forms</b>		
1.1 Environmental Training		
1.2 Roles and Responsibilities		
1.2a Delegation of Responsibilities		
1.2b TCM Attendance Register		
1.3 Reviewing and Auditing Documentation		
1.3a Reviewing Documentation Checklist		
1.3b Management of Change		
1.4 Compliance with Legal and other Requirements		
1.4a Register of Environmental Legislation		
1.4b Environmental Legislation Audit Record		
1.4c Environmental Legislation Audit Log		
1.5 Communication		



EMS Documents	Change Required? (Y/N)	Notes (justification as to why a change is required/not required)
1.6 Environmental Policy		
2.1 Waste Acceptance		
2.2 Waste Rejection		
2.2a Waste Rejection Form		
2.3 Waste Storage and Handling England		
2.4 Waste Storage and Handling Wales		
2.5 Waste Storage and Handling Scotland		
3.1 Maintenance		
3.1a Inspection Checklist		
3.2 Housekeeping, Litter, Pest, and Vermin Control		
3.3 Site Security		
4.1 Environmental Protection		
4.2 Odour Control (Chepstow)		
4.2a Odour Monitoring Form		
4.2b Odour Complaints		
4.3 Environmental Accidents / Incidents / Complaints		
4.3a Key Contacts		
4.3b Accident / Incident Form		
4.3c Complaints Form		
4.4 Emergency and Abnormal Conditions		
5.1 Waste Returns		
5.2 Notifications to the appropriate environmental bodies		
5.2a Notification Form		
<b>Drawings</b>		
Permit boundary drawings		

	<b>ENVIRONMENTAL MANAGEMENT SYSTEM- UK</b>	<b>EM 1.4</b>
<b>Compliance with Legal and other Requirements</b>		
<b>LEGAL REQUIREMENT:</b> Environmental permitting regulations 2016.		
<i>Purpose: To ensure that the sites covered by this EMS are operated in accordance with relevant regulatory and other requirements for the waste operations at all times.</i>		
<ol style="list-style-type: none"> <li>1. Produce a register of relevant environmental regulation. This should also include any non-statutory requirements e.g., Codes of Practice, standards etc.</li> <li>2. The register will be revised and updated, via an audit, on an annual basis or when new regulations relevant to the operations are identified, to ensure its currency.</li> <li>3. Audit of the Register will include:             <ul style="list-style-type: none"> <li>• Identification of any new regulation that is relevant to the operations.</li> <li>• Identification of European Directives which are due to be transposed into UK law.</li> <li>• Identification of any recent changes made to regulatory requirements already identified in the Register.</li> <li>• Identification of any new non-statutory requirements relevant to the operations.</li> <li>• An assessment of the compliance of the operations with the identified regulatory and non-statutory requirements.</li> <li>• Identification of any actions required to address compliance issues and a plan to implement these actions.</li> <li>• Review of any previous implementation plan created as a result of a compliance audit to ensure that identified issues were dealt with.</li> </ul> </li> </ol>	<b>RESPONSIBLE PERSON</b>  Site Manager  Site Manager  Site Manager	<b>RECORD</b>  Form No. 1.4a Register of Regulation  Form No. 1.4b Environmental Legislation Audit Report Form  Form No. 1.4b Environmental Legislation Audit Report Form

**Form No. 1.4a Register of Environmental Legislation**

*Purpose: To ensure that all documents are updated in response to relevant and emerging legislation.*

Legislation/code of practice	Applicable to which processes/product	Legislation type	Where is a copy held?	Person responsible for compliance
<b>General Environmental Legislation</b>				
Environmental Permitting (England and Wales) Regulations 2016 (2017 correction and 2018 amendments)	All	UK Statutory Instrument	<a href="https://www.legislation.gov.uk/uksi/2016/1154/pdfs/uksi_20161154_en.pdf">https://www.legislation.gov.uk/uksi/2016/1154/pdfs/uksi_20161154_en.pdf</a> (2016) <a href="http://www.legislation.gov.uk/uksi/2016/1154/pdfs/uksics_20161154_en.pdf">http://www.legislation.gov.uk/uksi/2016/1154/pdfs/uksics_20161154_en.pdf</a> (2017) <a href="http://www.legislation.gov.uk/uksi/2018/110/contents/made">http://www.legislation.gov.uk/uksi/2018/110/contents/made</a> (2018)	Mark Franklin
Environmental Protection Act 1990 c. 43 and Amendments.	All	UK Statutory Instrument	<a href="http://www.legislation.gov.uk/ukpga/1990/43/introduction">http://www.legislation.gov.uk/ukpga/1990/43/introduction</a>	Mark Franklin
The Environment Act 1995 c. 25.	All	UK Public General Act	<a href="http://www.legislation.gov.uk/ukpga/1995/25/introduction">http://www.legislation.gov.uk/ukpga/1995/25/introduction</a>	Mark Franklin
The Environmental Protection Act 1990 Amendment (Scotland) Regulations 2019 No. 332.	All	Scottish Statutory Instrument	The Environmental Protection Act 1990 Amendment (Scotland) Regulations 2019 (legislation.gov.uk)	Mark Franklin
<b>Waste Legislation</b>				
Waste Framework Directive 2008/98/EC	All	EU Directive	<a href="http://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:32008L0098">http://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:32008L0098</a>	Mark Franklin
Controlled Waste (England and Wales) Regulations 2012 No. 811.	All	UK Statutory Instrument	<a href="http://www.legislation.gov.uk/uksi/2012/811/introduction/made">http://www.legislation.gov.uk/uksi/2012/811/introduction/made</a>	Mark Franklin
Controlled Waste (Registration of Carriers and Seizure of Vehicles) (Amendment) Regulations 1999 No. 605.	All	UK Statutory Instrument	<a href="http://www.legislation.gov.uk/uksi/1998/605/regulation/2/made">http://www.legislation.gov.uk/uksi/1998/605/regulation/2/made</a>	Mark Franklin
The Waste (England and Wales) Regulations 2011 No. 988 (2012, 2014 and 2016 Amendments).	All	UK Statutory Instrument	<a href="http://www.legislation.gov.uk/uksi/2011/988/introduction/made">http://www.legislation.gov.uk/uksi/2011/988/introduction/made</a> (2011) <a href="http://www.legislation.gov.uk/uksi/2012/811/introduction/made">http://www.legislation.gov.uk/uksi/2012/811/introduction/made</a> (2012) <a href="http://www.legislation.gov.uk/uksi/2014/656/introduction/made">http://www.legislation.gov.uk/uksi/2014/656/introduction/made</a> (2014)	Mark Franklin

Legislation/code of practice	Applicable to which processes/product	Legislation type	Where is a copy held?	Person responsible for compliance
			<a href="http://www.legislation.gov.uk/uksi/2016/738/contents/made">http://www.legislation.gov.uk/uksi/2016/738/contents/made</a> (2016)	
List of Wastes (England) Regulations 2005 No. 895 and amendments.	All	UK Statutory Instrument	<a href="http://www.legislation.gov.uk/uksi/2005/895/introduction/made">http://www.legislation.gov.uk/uksi/2005/895/introduction/made</a>	Mark Franklin
The Waste Management Licensing (Scotland) Regulations 2011	All	Scottish Statutory instrument	<a href="https://www.legislation.gov.uk/ssi/2014/4/contents/made">https://www.legislation.gov.uk/ssi/2014/4/contents/made</a>	Mark Franklin
<b>Pollution Legislation</b>				
Pollution Prevention and Control Act 1999 c. 24.	All	UK Public General Act	<a href="http://www.legislation.gov.uk/ukpga/1999/24/introduction">http://www.legislation.gov.uk/ukpga/1999/24/introduction</a>	Mark Franklin
Control of Pollution (Amendment) Act 1989 c. 14.	Waste Carriers	UK Public General Act	<a href="http://www.legislation.gov.uk/ukpga/1989/14/introduction">http://www.legislation.gov.uk/ukpga/1989/14/introduction</a>	Mark Franklin
<b>Water Legislation</b>				
Water Resources Act 1991, as amended.	All (incl. discharge)	UK Statutory Instrument	<a href="http://www.legislation.gov.uk/ukpga/2010/29/introduction">http://www.legislation.gov.uk/ukpga/2010/29/introduction</a>	Mark Franklin
Groundwater Regulations 1998 No. 2746 as amended 2009 No. 2902.	All	UK Statutory Instrument	<a href="http://www.legislation.gov.uk/uksi/1998/2746/introduction/made">http://www.legislation.gov.uk/uksi/1998/2746/introduction/made</a> (1998) <a href="http://www.legislation.gov.uk/uksi/2009/2902/introduction/made">http://www.legislation.gov.uk/uksi/2009/2902/introduction/made</a> (2009)	Mark Franklin
<b>Wildlife and Countryside Legislation</b>				
Countryside and Rights of Way Act 2000 c. 3.	All	UK Public General Act	<a href="http://www.legislation.gov.uk/ukpga/2000/37/introduction">http://www.legislation.gov.uk/ukpga/2000/37/introduction</a> <a href="http://www.legislation.gov.uk/uksi/2013/514/contents">http://www.legislation.gov.uk/uksi/2013/514/contents</a>	Mark Franklin
Wildlife and Countryside Act 1981 c. 69 and amendments.	All	UK Public General Act	<a href="http://www.legislation.gov.uk/ukpga/1981/69/introduction">http://www.legislation.gov.uk/ukpga/1981/69/introduction</a>	Mark Franklin
Town and Country Planning 1990 c. 8 and amendments.	All	UK Public General Act	<a href="http://www.legislation.gov.uk/ukpga/1990/8/introduction">http://www.legislation.gov.uk/ukpga/1990/8/introduction</a>	Mark Franklin
<b>Noise and Nuisance Legislation</b>				
Noise emission in the environment by equipment for use outdoors 2001 No. 1701.	All	UK Statutory Instrument	<a href="http://www.legislation.gov.uk/uksi/2001/1701/introduction/made">http://www.legislation.gov.uk/uksi/2001/1701/introduction/made</a>	Mark Franklin

Legislation/code of practice	Applicable to which processes/product	Legislation type	Where is a copy held?	Person responsible for compliance
Control of Noise at Work Regulations 2005 No. 1643.	All	UK Statutory Instrument	<a href="http://www.legislation.gov.uk/uksi/2005/1643/contents/made">http://www.legislation.gov.uk/uksi/2005/1643/contents/made</a>	Mark Franklin

## Form No. 1.4b Environmental Legislation Audit Record


*Purpose: To record audits of the Register of Environmental Legislation.*

Audit Record		
Audit Items	Completed	Notes
Update Form No. 1.4a Register of Environmental Legislation. (Consider any new operations and any legislation that may be relevant to these)		
Assess the compliance of the operations with the identified regulatory and non-statutory requirements. Record on this form any non-compliances identified		
Review of any previous implementation plan created as a result of a compliance audit to ensure that identified issues were dealt with.		
Identify any actions required to address compliance issues and create a plan to implement these actions.		

**Form No. 1.4c Environmental Legislation Audit Log**



*Purpose: To record audits of the Register of Environmental Legislation.*

Audit Log		
Date of Compliance Audit	Person conducting Audit	Ref. for Implementation Plan created (if applicable)


	<b>ENVIRONMENTAL MANAGEMENT SYSTEM- UK</b>	<b>EM 1.5</b>
<b>Communication</b>		
<b>LEGAL REQUIREMENT:</b> Environmental permitting regulations 2016.		
<i>Purpose: To ensure that appropriate action is taken in response to both external and internal communication at all sites covered by this EMS.</i>		
<p><b><u>External Communication</u></b></p> <ol style="list-style-type: none"> <li>External communication concerns any information sent to and received from regulators or third parties.</li> <li>Types of external communication received include:             <ul style="list-style-type: none"> <li>Communications from regulatory authorities regarding compliance.</li> <li>Enquiries from customers.</li> <li>Complaints</li> </ul> </li> <li>Visitors from regulatory authorities will be accompanied by a member of staff during their inspection/visit to any of the sites.</li> <li>If an officer from a regulatory authority makes an unannounced visit to any of the sites, then the site Manager and Director will immediately be contacted to alert them to the presence of the officer. The contact details for each sites Manager or Director can be found in the Key Contacts Form.</li> <li>If Elis UK Limited receives written communication or telephone call from a regulatory authority, it will be dealt with by the sites Manager or Director.</li> <li>Any responses to communications from regulators will only be sent to the regulator by the sites Manager or Director.</li> <li>Enquiries from customers will be dealt with by admin staff to ensure that customer needs are met.</li> <li>All complaints are managed by the sites Manager or Director in accordance with the complaint's procedure.</li> </ol> <p><b><u>Internal Communication</u></b></p> <ol style="list-style-type: none"> <li>Internal communication on each site is typically direct from one member of staff to another.</li> </ol>	<p>RESPONSIBLE PERSON</p> <p>Site Manager</p> <p>Site Manager</p> <p>Site Manager</p> <p>Site Manager</p> <p>Site Manager</p>	<p>RECORD</p> <p>Form 4.3a Key Contacts</p> <p>Procedure No. 4.3 Environmental Accidents/ Incidents/ Complaints</p>



	<b>ENVIRONMENTAL MANAGEMENT SYSTEM- UK</b>	<b>EM 1.7</b>
<b>Environmental Policy</b>		
<b>LEGAL REQUIREMENT:</b> Environmental permitting regulations 2016.		
<i>Purpose: To demonstrate commitment from senior management to minimising environmental impacts of operations and to continuous improvement of environmental performance.</i>		

	<b>ENVIRONMENTAL POLICY MANUAL - UK</b>	<b>EP101</b>
<b>ENVIRONMENTAL &amp; ENERGY POLICY STATEMENT</b>		
<b>LEGAL REQUIREMENT:</b>		
<p><b>DECLARATION OF COMMITMENT</b>          Elis UK is committed to responsible energy management. We will comply with the requirements of environmental legislation. Wherever it is cost-effective, we will seek to improve our energy efficiency and reduce our environmental impact throughout all our premises, plant and equipment.</p> <p><b>POLICY</b>          Our policy is to control energy consumption to reduce our environmental impact, avoid unnecessary expenditure and improve cost-effectiveness, productivity and working conditions.</p> <p><b>OBJECTIVES</b>          Our objectives are to:</p> <ul style="list-style-type: none"> <li>• Purchase fuels and energy at the most economic cost.</li> <li>• Use fuels and energy as efficiently as possible.</li> <li>• Reduce the environmental impact caused by our energy consumption.</li> <li>• Reduce our water consumption.</li> <li>• Seek alternative cost-effective energy sources to reduce our environmental impact.</li> <li>• Raise awareness throughout our organisation of the business and environmental impact of our energy use.</li> </ul> <p><b>RESPONSIBILITIES</b>          Individual responsibilities lie with:</p> <ul style="list-style-type: none"> <li>• The Company Directors for overall responsibility for our energy use and environmental impact and for compliance with energy related legislation</li> <li>• The QSE Team for implementation of any subscribed schemes or agreements</li> <li>• The Local General Managers for the efficient use of energy at their site. Monitoring energy consumption and communicating energy use, efficiencies and emissions</li> <li>• The Local General Managers for compliance to any authoritative permit issued upon their site</li> </ul> <p><b>IMPLEMENTATION</b></p> <ul style="list-style-type: none"> <li>• The Purchasing Department will monitor energy prices and negotiate the most cost effective energy contracts available.</li> <li>• Monitoring and reporting on energy efficiency and emissions at site level will be carried out weekly.</li> <li>• Monitoring and reporting on energy efficiency and emissions at board level will be carried out monthly.</li> <li>• In-house and external training courses will be delivered to relevant personnel.</li> <li>• Information will be circulated through the company intranet, posters, email and internal seminars.</li> <li>• Regular reports will be generated detailing energy efficiency and emissions and made available to all relevant personnel.</li> </ul> <p><b>TARGETS</b></p> <ul style="list-style-type: none"> <li>• To achieve net zero emissions by 2045</li> <li>• Meet the Climate Change Agreement target for business and the Laundry Sector</li> <li>• Improve product resource efficient design, lifespan and end-of-life use: by 2025 at least one collection made of 100% sustainable materials in every product group</li> <li>• Promote sustainable decision-making by reducing, reusing, repurposing, or recycling materials and products: by 2025, 80% of textiles recycled</li> <li>• Improve our direct and indirect environmental impact and lower the greenhouse gas</li> <li>• By 2025, increase the number of eco-friendly vehicles.</li> </ul>		
<p><b>Dated – 01/01/2022</b></p> <div style="text-align: center; margin-top: 20px;">   <b>Mark Franklin</b>  <b>Country Operations Director UK</b> </div>		

## 2. Waste Acceptance and Storage


	<b>ENVIRONMENTAL MANAGEMENT SYSTEM- UK</b>	<b>EM 2.1</b>
<b>Waste Acceptance</b>		
<b>LEGAL REQUIREMENT:</b> Environmental permitting regulations 2016.		
<i>Purpose: To ensure that all sites covered by this EMS only accept appropriate waste types and that all necessary checks are made prior to acceptance of the waste on site.</i>		
<p><b><u>Environmental Permits and Waste Codes</u></b></p> <ol style="list-style-type: none"> <li>The Environmental Permits contain the list of waste types that are permitted to be accepted at the sites.</li> <li>Tables containing the codes and descriptions of waste types that are permitted to be accepted by Elis UK Ltd is included at the end of this procedure, see Table 2.1.1 Permitted Waste Types England, Table 2.1.2 Permitted Waste Types Wales, and Table 2.1.3 Permitted Waste Types Scotland.</li> <li>Any items found within the waste that are not acceptable under the Environmental Permit are rejected in accordance with the Waste Rejection Procedure, see Procedure No. 2.3 Waste Rejection.</li> <li>The Environmental Permits allow no more than 1,000 tonnes of waste per annum to be accepted on to a site.</li> </ol> <p><b><u>Collection from customer site</u></b></p> <ol style="list-style-type: none"> <li>Waste loads are determined whether they can be accepted upon collection from the customer premises.</li> <li>Visual inspections are made at the collection point by the driver arriving at a customer site to collect the waste.</li> <li>Bags containing washroom waste are visually inspected to confirm the description.</li> <li>Non-hazardous sharps and medicine waste is collected separately in individual colour coded containers. These containers are securely sealed making difficult to open each container to check the contents. In these instances, checks are made to confirm the waste is appropriate for storage based on its colour-coded packaging.</li> </ol> <p>Colour-coded packaging is visually inspected for damage.</p> <ol style="list-style-type: none"> <li>If waste bins containing sharps or medicine waste are damaged, they will not be accepted.</li> <li>If unsure whether to accept a load, consult the permitted waste types tables and then the sites Manager if necessary.</li> </ol>	<p><b>RESPONSIBLE PERSON</b></p> <p>All</p> <p>Site Operative</p> <p>Site Manager</p>	<p><b>RECORD</b></p> <p>Table 2.1.1 Permitted Waste Types England</p> <p>Table 2.1.2 Permitted Waste Types Wales</p> <p>Table 2.1.3 Permitted Waste Types Scotland</p> <p>Procedure No. 2.2 Waste Rejection</p> <p>Appendix B.1 Environmental Permits</p> <p>Table 2.1.1 Permitted Waste Types England</p>

	RESPONSIBLE PERSON	RECORD
		Table 2.1.2 Permitted Waste Types Wales
		Table 2.1.3 Permitted Waste Types Scotland
11. If the driver suspects that unsuitable waste or malodorous odours are present, then you must: <ul style="list-style-type: none"> <li>• Inform the site manager</li> <li>• Inform the customer</li> <li>• Not collect the waste</li> <li>• Issue a Waste Rejection Form</li> </ul>		Procedure No. 2.2 Waste Rejection
12. Before waste is collected it will be double bagged.		
13. Bags containing waste will be taken out of sanitary bins at customer sites and collectively placed into a larger bag. Only wastes from that customers site will be placed into a larger bag together.		
14. Before removing the waste from the customer, the driver will need to provide the customer with a Waste Transfer Note with a description matching the load.		Waste Transfer Note
15. A Seasonal Waste Transfer Note is a document that covers transfers for up to twelve months and may be given to customers who provide consistently generated waste.		Seasonal Waste Transfer Note
16. A copy of all Waste Transfer Notes given to customers will be kept on the relevant Elis site for their records.		
<b><u>Waste Transfer Notes</u></b>		
17. Drivers of vehicles collecting waste must ensure a completed Waste Transfer Note is provided to the client before leaving unless a Season Waste Transfer Note has been provided.	Site Operative	Waste Transfer Note
18. Primarily Seasonal Waste Transfer Notes will be provided as Elis UK Limited customers produce consistently generated waste of the same type.	Site Operative	Waste Transfer Note
19. Waste Transfer Notes must contain the following: <ul style="list-style-type: none"> <li>• Vehicle registration and driver's name and signature.</li> <li>• Waste haulier name and valid waste carrier's registration number.</li> <li>• Name, address (of source site) and signature of the transferor.</li> <li>• Name, address (of destination site) and signature of the person receiving the waste (transferee).</li> <li>• Permit number or exemption reference of the site</li> <li>• Description of waste including waste type, waste source and waste containment.</li> <li>• Tonnages.</li> <li>• List of Waste (LoW) code.</li> <li>• Date and time of waste transfer.</li> <li>• Waste Transfer Note number.</li> <li>• Confirmation that the Waste Hierarchy has been considered.</li> </ul>		
20. No weighbridge is present on any of the permitted sites so the weight of the waste will be calculated from its volume.	Site Operative	
21. The volume of waste from each customer site will be logged for the completion of Seasonal Waste Transfer Notes at the end of the 12-month period.		

	RESPONSIBLE PERSON	RECORD
22. Waste Transfer Notes will be appropriately stored for a minimum of 2 years.		
<b><u>Waste Acceptance onto Elis UK Limited sites</u></b>		
23. If any bags have split during transit, they will be re bagged before being placed into secure storage bins.		
24. If any unsuitable waste is found after arriving onto a Elis UK Limited site, it will be placed in the quarantine area before transfer to a suitably licenced facility.		
25. Waste will be stored for a maximum of five working days in the Quarantine area unless it has the potential to cause significant risk of pollution in which case it will be removed in less than five working days.		
26. Once arrived on site the double bagged waste is transferred from the vehicle into secure storage bins.	Site Operative	
27. The site Manager shall be immediately informed if there are incidents e.g., loss of containment of the waste.	Site Operative	
28. If the volume of waste stored on any Elis UK Limited site is near to the capacity of the storage bins provided, then the operator may choose to not collect anymore waste until there is sufficient free storage capacity on site.		
<b><u>Tracking and Records</u></b>		
29. The Site has a system for waste inventory and stock control for incoming wastes. The system contains the following information as a minimum: <ul style="list-style-type: none"> <li>• The date the waste arrived on Site.</li> <li>• The original producer's details (or unique identifier).</li> <li>• Waste Transfer Note number.</li> <li>• Waste pre acceptance and acceptance information</li> <li>• The intended disposal routes</li> <li>• The nature and quantity of wastes held on site</li> <li>• Where the waste is physically located on site</li> <li>• Details that link to relevant transfer notes</li> <li>• Details of any non-conformances and rejections.</li> </ul>	Site Manager	
<b><u>All Waste Collection Vehicles</u></b>		
30. Elis UK Ltd are a registered waste carrier and collect waste from their customers washrooms.		
31. All third-party hauliers used for transporting waste off site must be a registered waste carrier.	Site Operative	Waste Transfer Note
32. Details of third-party haulier waste carrier registrations will be retained in the Site office.	Site Operative	
33. Periodic checks should be completed on waste carrier registration certificates of third-party hauliers to ensure they remain valid. If the registration has expired, a copy of the renewed registration is requested.	Site Operative	
<b><u>Consequences</u></b>		
34. The consequence of not following this procedure may result in unsuitable waste being accepted on to the sites. This may constitute a breach in the conditions of the Environmental Permits, in addition to causing potential contamination of the sites		

**Table 2.1.2 Permitted Waste Types Wales**


Waste code	Description
<b>18</b>	<b>Healthcare waste</b>
<b>18 01</b>	<b>Natal care – diagnosis – treatment or prevention of disease in humans</b>
18 01 01	Sharps (except 18 01 03)
18 01 04	Waste whose collection and disposal is not subject to special requirements in order to prevent infection (for example dressings, plaster casts, linen, disposable clothing, diapers) Feminine hygiene products, nappies, bandages, and similar items.
18 01 09	Medicines other than those mentioned in 18 01 08
<b>18 02</b>	<b>Research – diagnosis – treatment or prevention of disease involving animals</b>
18 02 01	Sharps (except 18 02 02)
18 02 08	Medicines other than those mentioned in 18 02 07
<b>20</b>	<b>Municipal and similar materials from commerce and industry</b>
20 01	Separately collected fractions (except 15 01)
20 01 32	Medicines other than those mentioned in 20 01 31
20 01 99	Non-infectious sharps, dead animals, vomit, feminine hygiene products, nappies, bandages, and similar items. Or other non-hazardous fractions not otherwise specified.

	<b>ENVIRONMENTAL MANAGEMENT SYSTEM- UK</b>	<b>EM 2.2</b>
<b>Waste Rejection</b>		
<b>LEGAL REQUIREMENT:</b> Environmental permitting regulations 2016.		
<i>Purpose: To ensure non-compliant waste is rejected and that records of rejected loads are kept.</i>		
<p><b><u>Reasons for non-collection of waste</u></b></p> <p>1. Waste will not be collected if it contains any unsuitable waste or is malodorous.</p> <p><b><u>Notifications and Records</u></b></p> <p>2. A copy of the Waste Rejection Form containing the reasons for the rejection will be provided to the customer.</p> <p>3. Elis UK Limited may contact the appropriate environmental regulator regarding the rejection of the waste if it has or has the potential to cause significant environmental pollution.</p> <p>Details provided to the environment regulators include:</p> <ul style="list-style-type: none"> <li>• Nature and quantity of waste involved.</li> <li>• Time and date of receipt.</li> <li>• Name and address of Customer/Producer.</li> </ul> <p>4. Details and records relating to the storage and removal of unauthorised waste will be recorded and retained for Duty of Care purposes.</p>	<p><b>RESPONSIBLE PERSON</b></p> <p>Site Manager</p> <p>Site Manager</p> <p>Site Manager</p>	<p><b>RECORD</b></p> <p>Procedure No 2.1 Waste Acceptance</p> <p>Procedure No. 5.2 Notifications to Regulators</p> <p>Form No. 2.2a Waste Rejection / non collection</p> <p>Waste Transfer Note</p>




**Form No. 2.2a Waste Rejection / non collection**

Customer site:			
Contact:			
Phone:			
Fax:			
Email:			
Transfer Note No:			
Reason for Rejection:			
Actions Taken:			
You MUST inform the site Manager or other member of management before taking any further action.			
Manager Informed:			
Destination for Waste:			
Hazardous:	Yes / No		
Signed		Date	
Name		Position	

	<b>ENVIRONMENTAL MANAGEMENT SYSTEM- UK</b>	<b>EM 2.4</b>
<b>Waste Storage Wales</b>		
<b>LEGAL REQUIREMENT:</b> Environmental permitting regulations 2016.		
<i>Purpose: To ensure that waste is stored and handled securely and prevented from escape on the sites covered by this EMS.</i>		
<p><b><u>Storage of Waste</u></b></p> <p>9. The Environmental Permit limits the operations on site in terms of the amount of waste. No more than 50 tonnes of waste will be stored on site at any one time.</p> <p>10. To ensure storage limits are not exceeded the storage bins are visually inspected.</p> <p>11. Bagged washroom waste will be stored in sealed bins on impermeable concrete surfacing and will not be stored for longer than 7 days.</p> <p>12. Sealed sharps bins are stored in dedicated storage containers. Sharps will be stored for no longer than 1 month.</p> <p>13. Sealed blue-stream pharmaceutical waste bins containing medicinal waste are stored in dedicated storage containers. Medicinal waste will be stored for no longer than 1 month.</p> <p>14. Batteries (imported under an exemption) are stored in sealed containers inside a building. No more than 10 tonnes of batteries will be stored on a site at any one time, for no longer than 6 months.</p> <p>15. Waste storage containers will not be overfilled. If waste storage containers are full the Operator can choose to not collect waste until there is sufficient storage available.</p> <p>16. Waste storage areas are inspected regularly as part of the Site inspection regime.</p>	<p><b>RESPONSIBLE PERSON</b></p> <p>Site Operative</p> <p>Site Operative</p> <p>Site Manager</p> <p></p> <p></p> <p></p> <p></p> <p>All</p>	<p><b>RECORD</b></p> <p></p> <p>Form No. 3.1a Inspection Checklists</p> <p></p> <p></p> <p></p> <p></p> <p>Procedure No. 3.1 Maintenance</p> <p>Form No. 3.1a Inspection Checklist</p>

### **3. Site Management**

	<b>ENVIRONMENTAL MANAGEMENT SYSTEM- UK</b>	<b>EM 3.1</b>															
<b>Maintenance</b>																	
<b>LEGAL REQUIREMENT:</b> Environmental permitting regulations 2016.																	
<i>Purpose: To ensure that Elis UK Limited maintains infrastructure and equipment to ensure pollution prevention.</i>																	
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**Form No. 3.1a Inspection Checklists**

Daily Inspection Checklist			
Item for Visual Inspection	Aspects for Inspection	Checked Y/N	Remedial Action Required (Y/N, describe)
Litter	None present within waste storage areas		
	None present along or outside site boundaries (fencing etc.)		
Fire	Fire watch (No evidence of heating, smoke or fire)		
Dust emissions	No dust emissions escaping the boundary of the site		

Date: \_\_\_\_\_

Completed by: \_\_\_\_\_

Signature: \_\_\_\_\_

Weekly Inspection Checklist			
Item for Visual Inspection	Aspects for Inspection	Checked Y/N	Remedial Action Required (Y/N, describe)
Site Security	CCTV system is operational.		
	Fencing around site perimeter is in good condition.		
	Lock on gated entrance is working and no signs of corrosion.		
Waste Storage	Waste storage areas are not exceeding the dimensions included in the Fire Prevention Plan.		
	Waste storage areas are free from build-up (litter, loose waste, fluff, dust).		
Weather	Weather forecast has been checked for coming week to determine if waste operations will be impacted.		
Odour Monitoring	Odour monitoring using the sniff test and recorded on the Odour Monitoring Form  (during periods of extreme warmer weather above 25 degrees C odour monitoring will take place more frequently).		
Waste Storage (Sanitary)	Waste stored on site does not exceed maximum storage time (7 days).		

Date: \_\_\_\_\_

Completed by: \_\_\_\_\_

Signature: \_\_\_\_\_

Monthly Inspection Checklist			
Item for Visual Inspection	Aspects for Inspection	Checked Y/N	Remedial Action Required (Y/N, describe)
Impermeable surfacing	Free from cracks which may allow water to reach the ground below.		
Containers	Containers free from cracks which may result in loss of containment.		
Waste storage (Sharps, Medicine, Ancillary)	Waste stored on Site does not exceed maximum storage times (1 month)		
Fire	Fire bell is in good working order.		
Drains	Drains are free from blockages.		
Electrics	Wires are not frayed / damaged.		
	Sockets are not overloaded.		

Date: \_\_\_\_\_

Completed by: \_\_\_\_\_

Signature: \_\_\_\_\_


Annual Inspection Checklist			
Item for Visual Inspection	Aspects for Inspection	Checked Y/N	Remedial Action Required (Y/N, describe)
Site Security	The gates to the site are in working order and are lockable.		
Waste Storage Bins / Containers	No cracks or imperfections which could cause waste to escape.		
	Locks are working.		
Electrics	Electrics to be inspected and certified by a qualified electrician.		
Fire	Fire extinguishers in place and no obvious damage.		


Date: \_\_\_\_\_

Completed by: \_\_\_\_\_

Signature: \_\_\_\_\_



	<b>ENVIRONMENTAL MANAGEMENT SYSTEM- UK</b>	<b>EM 3.2</b>
<b>Housekeeping, Litter, Pest, and Vermin Control</b>		
<b>LEGAL REQUIREMENT:</b> Environmental permitting regulations 2016.		
<i>Purpose: To ensure good housekeeping and control of litter, pests, and vermin throughout Elis UK Limited sites.</i>		
	<b>RESPONSIBLE PERSON</b>	<b>RECORD</b>
<b><u>Housekeeping and Litter</u></b>		
1. Waste accepted will be triple contained, therefore is unlikely to produce significant quantities of litter	Site Operative	Procedure No. 2.1 Waste Acceptance
2. All sites are inspected regularly for litter, foodstuffs, and other waste. Necessary actions are taken to ensure that litter does not build up on the sites.	All	Procedure No. 3.1 Maintenance
3. Waste is stored in sealed bins and is not allowed to escape from the boundary of any site. If litter does escape from a site, this is collected up.	All	
4. On-site litter is collected and disposed of regularly to keep the sites tidy. Windblown material caught in boundary hedging / trees is cleared regularly	All	Procedure No. 3.1 Maintenance
5. Waste storage bins are cleaned regularly to ensure that residue waste does not build up and odour is minimised.		
<b><u>Pests and Vermin Control</u></b>		
6. Waste imported on to the sites should not contain putrescible materials attractive to pests, vermin, or birds.	Site Operative	Procedure No. 2.1 Waste Acceptance
7. The sites are inspected regularly for evidence of pest and vermin infestations and the findings recorded. If evidence of any of these is found, an appropriate specialist contractor shall be called in to manage or eradicate the problem.	Site Operative	Procedure No. 3.1 Maintenance

	<b>ENVIRONMENTAL MANAGEMENT SYSTEM- UK</b>	<b>EM 3.3</b>									
<b>Site Security</b>											
<b>LEGAL REQUIREMENT:</b> Environmental permitting regulations 2016.											
<i>Purpose: To ensure the sites covered under this EMS provide protection of facilities and the personnel on site of critical importance.</i>											
<ol style="list-style-type: none"> <li>Laptop computers, company mobile phones, personal and/or confidential data is not left unattended anywhere in plain sight for any length of time, particularly on a desk, in cars or public areas. They are always locked away out of sight and kept out of direct sunlight and away from excessive heat, liquids, smoke, and food.</li> <li>Backup copies of the electronic (or equivalent) reporting system are stored in another secure location off all sites.</li> <li>All sites operating under this EMS are surrounded by secure fencing. The condition of the entrance gates is checked as part of the Maintenance procedure.</li> </ol> <p><b><u>Security Breaches</u></b></p> <ol style="list-style-type: none"> <li>A security breach is a break in or unauthorised entry.</li> <li>The sites Manager will be contacted immediately following a security breach.  If necessary, the Manager of the site will contact the police to inform them of the incident, provide any evidence on damage / items stolen and request a crime reference number.</li> <li>In the event of an alarm being activated staff from a security breach, staff will only enter the sites Office if they are accompanied by either another member of staff or the police.</li> <li>The Manager of the site should assess the situation and any damage caused. A list should be made of the damaged or stolen items and where possible photos of the damage.</li> <li>The Accident / Incident Form should be completed.</li> </ol>	<table border="1"> <thead> <tr> <th>RESPONSIBLE PERSON</th> </tr> </thead> <tbody> <tr> <td>Site Operative</td> </tr> <tr> <td>Site Operative</td> </tr> <tr> <td>Site Manager</td> </tr> <tr> <td>All</td> </tr> <tr> <td>Site Manager</td> </tr> </tbody> </table>	RESPONSIBLE PERSON	Site Operative	Site Operative	Site Manager	All	Site Manager	<table border="1"> <thead> <tr> <th>RECORD</th> </tr> </thead> <tbody> <tr> <td>Procedure No. 3.1 Maintenance</td> </tr> <tr> <td>Form No. 4.3b Accident / Incident Form</td> </tr> </tbody> </table>	RECORD	Procedure No. 3.1 Maintenance	Form No. 4.3b Accident / Incident Form
RESPONSIBLE PERSON											
Site Operative											
Site Operative											
Site Manager											
All											
Site Manager											
RECORD											
Procedure No. 3.1 Maintenance											
Form No. 4.3b Accident / Incident Form											

## **4. Environmental Protection & Emergency Provisions**

ISSUE No: 1  
ISSUE DATE: 21/06/2022  
REVISION No: 0  
REVISION DATE:  
REASON FOR REVISION:

	RESPONSIBLE PERSON	RECORD
12. Good housekeeping measures are implemented at all sites to further reduce any risks of malodour.		Procedure No. 3.2 Housekeeping, Litter, Pest, and Vermin Control
13. Waste storage bins are cleaned on a regular basis to remove any odour.		Procedure No. 3.2 Housekeeping, Litter, Pest, and Vermin Control
14. In the event of a complaint of odour being received, the Accident, Incidents and Complaints Procedure should be followed.		Procedure No. 4.3 Environmental Accidents / Incidents / Complaints

ISSUE No: 1  
ISSUE DATE: 21/06/2022  
REVISION No: 0  
REVISION DATE:  
REASON FOR REVISION:



	RESPONSIBLE PERSON	RECORD
9. In the event of a complaint of odour being received, an Odour Complaint Form should be complete.	Site operative	Form No. 4.2b Odour Complaint

**Form No. 4.2a Odour Monitoring**

Date and time		Assessor	
Weather conditions and temp		Wind direction and strength	

Location	Time of test	Odour				
	Start/Finish	Y/N	Intensity	Extent	Description	Source
Site entrance						
Permit boundary						
Other (e.g. location closest to any complaint, if applicable)						
Action taken?						
Comments:						
Action required/taken?						

Intensity Scale	0. No odour	1. Very faint odour	2. Faint odour	3. Distinct odour	4. Strong odour	5. Very strong odour	6. Extremely strong odour
Extent classification	I: Intermittent				P: Persistent		

Intensity of 3 or above, action must be taken to identify the cause and take preventative steps to prevent an odour emission.

Persistent intensity of 4 or above will require remedial action i.e. removal of waste from site.

Intermittent intensity of 6 will require investigative action with potential for remedial action (removal from site)




**Form No. 4.2b Odour Complaint**

Odour Complaint Report Form	
Time and Date of Complaint:	Name and address of complainant:
Telephone number of complainant:	

Date of odour:	
Time of odour:	
Location of odour, if not at above address:	
Weather conditions (i.e., dry, rain, fog, snow):	
Temperature (very warm, warm, mild, cold, or degrees if known):	
Wind strength (none, light, steady, strong, gusting):	
Wind direction (e.g., from NE):	
Complainants' description of odour:	
○ What does it smell like?	
○ Intensity (see below):	
○ Duration (time):	
○ Constant or intermittent in this period:	
○ Does the complainant have any other comments about the odour?	
Are there any other complaints relating to the site or to the location? (either previously or relating to the same exposure):	
Any other relevant information:	
Do you accept that odour likely to be from your activities?	
What was happening on site at the time the odour occurred?	
Actions taken:	
Form completed by:	Date: Signed

**Intensity**

0 No odour	2 Faint odour	4 Strong odour	6 Extremely strong odour
1 Very faint odour	3 Distinct odour	5 Very strong odour	

	<b>ENVIRONMENTAL MANAGEMENT SYSTEM- UK</b>	<b>EM 4.3</b>	
<b>Environmental Accidents / Incidents / Complaints</b>			
<b>LEGAL REQUIREMENT:</b> Environmental permitting regulations 2016.			
<i>Purpose: To ensure that all environmental accidents, incidents, and complaints are reported and investigated.</i>			
<p><b><u>Incidents and Accidents</u></b></p> <ol style="list-style-type: none"> <li>Accidents and incidents are unplanned negative events that may result in property damage and may cause illness or injury to persons working.</li> <li>Examples of accidents and incidents include injuries, near misses, dangerous occurrences, spillages, complaints, material damage, and pollution incidents.</li> <li>An incident also includes non-conformances such as a breach of the Environmental Permits, other sites authorisation or procedure within this Management System.</li> <li>On discovery of the accident the sites Manager must be informed.</li> <li>If possible, efforts should be made to reduce the impact of the accident i.e., stop the substance being released and containing the spillage or emissions.</li> <li>The Accident / Incident Form needs to be completed for all occurrences on any site and retained in the sites Office. In the event of the following accidents and incidents, it is also reported to the relevant regulatory authority:               <ul style="list-style-type: none"> <li>Any malfunction, breakdown of failure of equipment or techniques, accident or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution.</li> <li>The breach of a specified limit in the permit.</li> <li>Any significant adverse environmental effects.</li> </ul> </li> <li>The site Manager will contact or instruct another member of staff to contact neighbouring residents / businesses if necessary.</li> </ol> <p><b><u>Complaints</u></b></p> <ol style="list-style-type: none"> <li>Any complaint received will be dealt with by the site Manager or Director. A complaints form will be completed to record all information concerning the complaint, issues giving rise to the complaint and what was done in response to the complaint.</li> </ol>		<b>RESPONSIBLE PERSON</b>	<b>RECORD</b>
		<p>All</p> <p>All</p> <p>All</p> <p>Site Manager</p> <p>Site Manager</p>	<p>Form No. 4.3b Accident / Incident Form</p> <p>Procedure No. 5.2 Notifications to Regulators</p> <p>Form No. 4.3a Key Contacts</p> <p>Form No. 4.3c Complaints Form</p>

**Form No. 4.3a Key Contacts**


SITE DETAILS		
Location: Elis UK Limited		
Postcode:		
Site Access Grid Reference:		
SITE CONTACTS	Name	Contact No.(s)
Directors:		
Site Manager		
EMERGENCY SERVICES		Contact No.(s)
Emergency:		999
Police:		999
Fire:		999
REGULATORS		Contact No.(s)
Health and Safety Executive (HSE); Incident Contact Centre:		0345 300 9923
Local Authority		
Environment Agency: Floodline:		03708 506506 0345 988 1188
EA (24-hour emergency hotline):		0800 80 70 60
Natural England:		0845 600 3078
Natural Resource Wales:		0300 065 3000
Scottish Environment Protection Agency:		0300 099 6699
UTILITY / KEY SERVICES		Contact No.(s)
Water undertaker:		
Gas supplier:		
Electricity supplier:		
Oil supplier:		
Fuel supplier:		
Chemical supplier:		
Oil spill contractor:		
Electrician:		
Plumber:		
Insurance Provider		
OTHER KEY CONTACTS	Name	Contact No.(s)
Office:		
Environmental Consultant	Tracey Westbury Westbury Environmental Ltd.	01952 879705
Planning Consultant		
Adjacent landowners / Neighbours		


**Form No. 4.3b Accident / Incident-Form**

<b>Date and time of the accident / incident</b>	
What happened? What was it about?	
Was anyone else aware of this? Were there any witnesses? If so, who?	
What caused it?	
What have you done to make sure that it does not happen again?	
Was there any significant pollution or environmental damage to land, water, or protected areas - for example: dust, odour or noise pollution outside the Site or spillage of polluting liquids onto the ground, or at a site of special scientific interest, or into a drain or watercourse? If so, what?	
If so, then you must take steps to prevent further damage and notify the relevant regulators ASAP.  Have you done so? Yes <input type="checkbox"/> No <input type="checkbox"/>	Who did you phone?  At what time did you phone?
You must also write or send an email to confirm this to your local Environmental regulatory office.  Have you done so? Yes <input type="checkbox"/> No <input type="checkbox"/>	What date did you contact?
Please print and sign your name.	

**Form No. 4.3c Complaints Form**


Who made the complaint?	Name:	
	Address:	
	Phone No.:	
Date and time they made the complaint:		
What happened? What was it about?		
Was anyone else aware of this – other neighbours or your staff? If so, who?		
Did the complaint relate to your site? If so, what happened? What went wrong?		
What have you done to make sure that it does not happen again?		
Was there any significant pollution – for example: dust, odour or noise outside the Site or spillage of polluting liquids onto the ground, into a drain or a watercourse?		
If there was, then you must notify the relevant regulators.  Have you done so?    Yes <input type="checkbox"/> No <input type="checkbox"/>		At what time did you phone?
You must also write or send an email to confirm this to your local Environment regulators office.  Have you done so?    Yes <input type="checkbox"/> No <input type="checkbox"/>		What date did you contact?
Please print and sign your name:		

	<b>ENVIRONMENTAL MANAGEMENT SYSTEM- UK</b>	<b>EM 4.4</b>
<b>Flood Management</b>		
<b>LEGAL REQUIREMENT:</b> Environmental permitting regulations 2016.		
<i>Purpose: To ensure the correct action is taken in case of a flood.</i>		
<ol style="list-style-type: none"> <li>Flooding could occur from:             <ul style="list-style-type: none"> <li>Excess rainfall</li> <li>Storm Surges</li> <li>Storm water flows</li> <li>Fire water generation</li> </ul> </li> <li>To determine the risk of a flood, flood line and/or local authorities should be contacted. Staff are informed of any period of increased flood risk.</li> <li>Waste is stored in sealed bins / closed containers, therefore in the event of a flood, waste will be contained and is unlikely to enter the flood water or cause significant contamination.</li> <li>The surfacing on all sites where waste is stored is concrete, as such water will collect in drains and minimise standing water. A flood event may occur if the groundwater level is high or if the water holding capacity of the drains is exceeded.</li> <li>Staff are trained in who to contact, utility service cut off points and protective actions to be completed in the event of a flood.</li> <li>During a flood, the site may contact the relevant Floodline contact number, customers, and the Local Authority, depending on the severity of impact. The relevant environmental regulator and customers will be contacted if the flooding disrupts normal operations.</li> <li>In the event of a flood, isolation of water supplies may prevent the escalation of the emergency and prevent further hazards.</li> <li>Staff complete protective actions to prevent material damage to stock, equipment, and possessions, and minimise the environmental impact of flooding.             <ul style="list-style-type: none"> <li>Computer and files/records in the site's office- electronic equipment and physical files will be removed off site in a significant flood event. Copies of records will be kept off site and backed up electronically when necessary.</li> </ul> </li> </ol> <p><b><u>Recovery after a Flood</u></b></p> <ol style="list-style-type: none"> <li>Following a flooding event, the integrity of affected buildings, storage bins and equipment will be inspected and assessed. Any flood damage may be reported to the insurance provider and will be repaired.</li> <li>If required, after a flood, the relevant regulator and customers will be contacted to confirm the resumption of operations.</li> </ol>	<b>RESPONSIBLE PERSON</b>	<b>RECORD</b>
	Site Manager	Form No. 4.3a Key Contacts
	Site Manager	Procedure No. 1.1 Environmental Training
	Site Manager	Form No. 4.3a Key Contacts
	Site Manager Site Operative	
	All	

	<b>ENVIRONMENTAL MANAGEMENT SYSTEM- UK</b>	<b>EM 4.5</b>													
<b>Fire</b>															
<b>LEGAL REQUIREMENT:</b> Environmental permitting regulations 2016.															
<i>Purpose: To ensure necessary action is taken in the event of a fire, to minimise the environmental impact.</i>															
<ol style="list-style-type: none"> <li>Implementation of EMS procedures will minimise the occurrence of fire on all site's including the following:             <ul style="list-style-type: none"> <li>Implementing the Waste Acceptance Procedure.</li> <li>Unauthorised combustible wastes are rejected in accordance with the Waste Rejection procedure.</li> <li>Effective management of common causes of fire which can occur on all sites.</li> <li>Smoking is not authorised in waste storage areas</li> </ul> <p><b><u>Fire Detected on Vehicle at Waste Reception Area</u></b></p> <li>Elis UK Limited accepted washroom waste for the purpose of transfer. It is unlikely that an incoming load will be on fire. However, in the unlikely event that a 'hot load' is discovered, the following procedure should be carried out.</li> <li>If it is safe to move the vehicle it should be directed to the emergency offloading area (quarantine). Once in the emergency offloading area, the load shall be ejected from the vehicle.</li> <li>If it is not safe to move the vehicle, then the sites Office building may need to be evacuated.</li> <li>The unloaded material should be smothered out with firewater to reduce any spreading of the fire.</li> <li>The vehicle that brought the load shall be thoroughly checked to ensure that all burning/smouldering material has been unloaded.</li> <li>Once the material is no longer burning / smouldering and vehicle is in a fit state the waste shall be reloaded onto the vehicle and rejected off the site.</li> <li>The relevant regulator and the Health and Safety Manager must be informed of the incident as soon as reasonably possible and record the details of the incident in the site Diary and complete the appropriate Accident / Incident /Complaints Form. All instances will require full accident investigation and revision of the Environmental Accident Management Plan.</li> </li></ol> <p><b><u>Recovery after a Fire</u></b></p> <li>After a fire is extinguished, it should be monitored until it is certain that it is completely out and poses no risk of causing a secondary fire.</li> <li>All burnt materials will be placed in a suitable container or quarantined, when safe to do so, and removed from the site as soon as possible. Burnt materials will then be sent off site to a suitably licensed waste facility.</li>	<table border="1"> <thead> <tr> <th>RESPONSIBLE PERSON</th> <th>RECORD</th> </tr> </thead> <tbody> <tr> <td>All</td> <td>           Procedure No. 2.1 Waste Acceptance             Procedure No. 2.2 Waste Rejection             Procedure No. 3.1 Maintenance         </td> </tr> <tr> <td>Site Manager</td> <td></td> </tr> <tr> <td>Site Manager</td> <td></td> </tr> <tr> <td>Site Manager</td> <td>Procedure No. 2.2 Waste Rejection</td> </tr> <tr> <td>Site Manager</td> <td>Form No. 4.3a Key Contacts Form No. 4.3b Accident / Incident / Complaints Form Form No.5.2a Notification Form</td> </tr> <tr> <td>Site Manager</td> <td></td> </tr> </tbody> </table>	RESPONSIBLE PERSON	RECORD	All	Procedure No. 2.1 Waste Acceptance  Procedure No. 2.2 Waste Rejection  Procedure No. 3.1 Maintenance	Site Manager		Site Manager		Site Manager	Procedure No. 2.2 Waste Rejection	Site Manager	Form No. 4.3a Key Contacts Form No. 4.3b Accident / Incident / Complaints Form Form No.5.2a Notification Form	Site Manager	
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Site Manager															

	RESPONSIBLE PERSON	RECORD
11. The discharge of fire water and other firefighting substances e.g., powder / foam that may be present on site will be managed according to the amount present and the level of contamination present.		
12. The risk of a secondary fire will be assessed, after deciding there is no foreseeable chance of further fire, the site will be cleaned up and re-opened.	Site Manager	
13. In all cases of a fire on any of the site's the cause of the fire will be investigated and recorded.		Form No. 4.3b – Accident / Incident / Complaints Form
14. As a result of the fire investigation, if appropriate, further measures will be taken to reduce the likelihood of a similar fire taking place in the future.	Site Manager	
<b><u>Fire Detection and What to Do</u></b>		
15. Fires will be detected by identifying visual (smoke and vapour etc), increased heat and burning odours. Upon detection of a fire, the site Manager will be notified immediately.	All	
16. A fire drill will be completed on a 6 monthly basis. The drills will go through what is to be done in the event of a fire and will typically include: <ul style="list-style-type: none"> <li>• Fire detection</li> <li>• Fire suppression techniques</li> <li>• Determination of locations to segregate burning wastes</li> <li>• Fire water containment</li> </ul>		
17. Records relating to fire drills will be retained.	Site Manager	Form No. 4.6.1a Fire Drill Checklist
18. The results of the fire drills will be reviewed. If it is determined that the fire response is inadequate, then this will be updated to ensure responses are efficient and effective. If necessary, the Environmental Accident Management Plan will be updated.	Site Manager	





	<b>ENVIRONMENTAL MANAGEMENT SYSTEM- UK</b>	<b>EM 4.5.1</b>
<b>Control of causes of fire (Wales - Chepstow)</b>		
<b>LEGAL REQUIREMENT:</b> Environmental permitting regulations 2016.		
<i>Purpose: To identify causes of fire on the Site and how these are controlled to minimise fire risk</i>		

	RESPONSIBLE PERSON	RECORD
1. Potential causes of fire on Site are: <ul style="list-style-type: none"> <li>Arson</li> <li>Plant and Equipment</li> <li>Electrical faults including damaged or exposed electrical cables</li> <li>Discarded smoking materials</li> <li>Ignition sources</li> <li>Leaks and spillages</li> <li>Build-up of loose combustible waste, dust, or fluff</li> <li>Waste acceptance and deposited hot load</li> <li>Hot or dry weather</li> </ul>		
<b><u>Arson</u></b>		
2. The Site has security measures in place and actions for when security is breached.	Site Operative	Procedure No. 3.1 Maintenance  Procedure No. 3.3 Site Security
3. Security measures are maintained to prevent breaches in security and the risk of arson from unauthorised access.	Site Manager	
<b><u>Plant and Equipment</u></b>		
4. There are no plant or equipment associated with waste treatment/storage of waste with the potential to be a source of ignition/fuel, stored on Site.		
5. There is a potential for vehicles entering the Site to leak fuels and oils.		
6. All vehicles will be maintained a minimum of 6m from combustible waste.		
7. <b><u>Electrical faults including damaged or exposed electrical cables</u></b>		
8. Electricity is used to power the CCTV. Checks to ensure cables are in a good condition and that sockets are not overloaded are completed. The results of the inspection are recorded on the Inspection Checklist.		
9. Any electrical works are completed by a suitably qualified person. Competency and other records relating to electrical works are retained by Elis UK Ltd.		
<b><u>Discarded Smoking Materials</u></b>		
10. No smoking is permitted in waste storage areas.	All	
<b><u>Ignition Sources</u></b>		
11. Vehicles of staff working on the wider Elis UK Ltd site are parked within the permitted area. All vehicles will be parked a minimum of 6m from combustible waste.	All	
12. There are no other sources of ignition located close to the permitted area.		

	RESPONSIBLE PERSON	RECORD
<b><u>Leaks and Spillages</u></b>		
13. Leaks and spillages have the potential to spread fire across the site.		
14. No fuel or oil is stored on site.		
15. There is a risk of fuel / oil leaks from vehicles parked adjacent to the site. All vehicles will be parked a minimum of 6m from combustible waste.		
<b><u>Build-up of loose combustible waste, dust, or fluff</u></b>		
16. Waste comprising mainly of dust are not accepted on site when applying the Waste Acceptance Procedure.	Site operative	Procedure No. 2.1 Waste Acceptance
17. Implementation of the housekeeping procedure ensures the site is tidy and that storage bins are fully emptied to reduce the likelihood to reduce the likelihood of loose combustible waste dust, or fluff.	Site operative	Procedure No. 3.2 Housekeeping, Litter, Pest, and Vermin Control
<b><u>Waste Acceptance and deposited hot loads</u></b>		
18. Waste accepted during collection from Elis UK Ltd is controlled by a waste acceptance procedure.	Site operative	Procedure No. 2.1 Waste Acceptance
19. Hot loads are managed with the Fire Suppression and Containment Procedure.		
<b><u>Hot or Dry Weather</u></b>		
20. Combustible waste will be stored in sealed bins out of direct sunlight.		


	<b>ENVIRONMENTAL MANAGEMENT SYSTEM- UK</b>	<b>EM 4.6</b>
<b>Reducing the Impact of a Fire (Wales - Chepstow)</b>		
<b>LEGAL REQUIREMENT:</b> Environmental permitting regulations 2016.		
<i>Purpose: To reduce the impacts of a fire on the Site if one were to occur.</i>		
<ol style="list-style-type: none"> <li>1. The site reduces the impact of fire by:             <ul style="list-style-type: none"> <li>• Minimising the storage time of combustible waste on site.</li> <li>• Maintaining a 6m distance between combustible wastes, buildings, and stationary vehicles.</li> <li>• Reducing fire spread by housekeeping, maintaining separation distances.</li> </ul> </li>   <li>2. Controlling the causes of fire effectively will reduce the likelihood of fires occurring and their impact.</li> </ol>	<b>RESPONSIBLE PERSON</b>          Site Operative	<b>RECORD</b>          Procedure No. 3.1 Maintenance  Procedure No. 3.3 Site Security

	ENVIRONMENTAL MANAGEMENT SYSTEM- UK	EM 4.6.1
Fire Detection and What to Do (Wales - Chepstow)		
<b>LEGAL REQUIREMENT:</b> Environmental permitting regulations 2016.		
<i>Purpose: To ensure measures are taken to detect a fire on the site and provide information on what to do in the event of a fire.</i>		
	RESPONSIBLE PERSON	RECORD
1. This procedure outlines fire detection measures used across different section of the site and actions to be taken following the detection of a fire.		
2. Fires will be detected by identifying visual (smoke and vapour etc), increased heat and burning odours. Fires or suspected fires may be detected when completing fire watches.	Site Operative	
3. Appropriate action will be taken to ensure the affected area is isolated and that vehicles and staff are prevented from entering the area.	Site Operative	
4. Waste will not be accepted on to the site in the event of a substantial fire. It may be necessary to not collect anymore waste loads so as not to disrupt the access and egress of the emergency services.	Site Operative	
<b><u>Detection and What to do During Operational Hours</u></b>		
5. Upon detection of a fire or suspected fire by staff or the CCTV system, the Site Manager will be notified immediately. The Site Manager will contact the Fire and Rescue Service.	Site manager	
6. It will take the Fire and Rescue Service within five minutes to attend the site once called.		
7. The fire will be isolated within the waste storage bin.		
8. Staff and any drivers will evacuate the area. If a full site evacuation is needed, people will assemble at the emergency assembly point.		
9. Staff will cover the drain in the Firewater Containment Area with a mat.		
10. Neighbours, Natural Resources Wales, and firewater removal company will be contacted in the event of a fire.		
The water undertaker, local Council and the police may be contacted in the event of a fire.		
<b><u>Detection and What to do During Non-Operational Hours</u></b>		
11. The site has a CCTV system which is monitored externally 24/7.  In the event of a fire the Manager of the site will be contacted immediately.		
12. The site Manager will contact the Fire and Rescue Service to attend the site.	Site manager	
13. If the site Manager arrives on site before the Fire and Rescue Service, they unlock the gates and provide access to the site.  If safe, the site Manager will start fire suppression.	Site manager	
14. The site Manager will cover the drain in the Firewater Containment Area with a mat.		

	RESPONSIBLE PERSON	RECORD
<b><u>Fire Drill</u></b>		
15. A fire drill will be completed on a 6-monthly basis. The drills will go through what is to be done in the event of a fire and will typically include: <ul style="list-style-type: none"> <li>• Checks that staff are trained on relevant procedures.</li> <li>• Fire detection</li> <li>• Fire suppression techniques</li> <li>• Firewater containment</li> </ul>	Site manager	Form No. 4.6.1a Fire Drill Checklist
16. Records relating to fire drills will be retained		
17. The results of the fire drills will be reviewed. If it is determined that the fire response is inadequate, then this will be updated to ensure responses are efficient and effective. If necessary, the Fire Prevention Plan will be updated.	Site Manager	


**Form No. 4.6.1a Fire Drill Checklist (Wales – Chepstow)**

Item	Aspect to be Checked	Checked?	Notes
EMS training	All staff members trained regarding fire procedures.		
	Staff evacuated to emergency assembly point.		
Fire detection	Visual, odour or heat signal used to detect fire		
	The CCTV system detected the fire		
	Fire and Rescue Service contacted.		
	Neighbours, Natural Resources Wales and firewater removal company contacted.		
Suppression of a fire	Fire extinguishers and hoses in place and in working order.		
Fire Water Containment	The drain in the firewater containment area has been covered by a mat.		

	ENVIRONMENTAL MANAGEMENT SYSTEM- UK	EM 4.6.2
Fire Suppression and Containment (Wales - Chepstow)		
<b>LEGAL REQUIREMENT:</b> Environmental permitting regulations 2016.		
<i>Purpose: To ensure that fires are suppressed, and steps are taken to reduce the spread of fires.</i>		
<ol style="list-style-type: none"> <li>Procedure No.4.5.1 Fire Detection and What to do should be followed in the event of a fire occurring on the site.</li> </ol> <p><b><u>Hot Loads</u></b></p> <ol style="list-style-type: none"> <li>A Hot Load is waste that catches fire, smoulder, or spontaneously combusts within the delivering vehicle.</li> <li>Drivers with Hot Loads report this to the site Manager, upon arrival to the site. The vehicle containing the hot load will be moved (if safe to do so) to the Fire Quarantine Area for tipping.</li> <li>The Hot Load is removed from the vehicle and placed in the waste quarantine bin. The vehicle is then checked to ensure the entire contents of the load has been ejected.</li> <li>If required, the fire and rescue service will be contacted to assist suppression of the Hot Load.</li> </ol> <p><b><u>Site Fires</u></b></p> <ol style="list-style-type: none"> <li>Site fires will be suppressed in accordance with the Fire Prevention Plan.</li> <li>During operational hours, fires will be suppressed using fire extinguishers and hoses connected to mains water.</li> <li>Only trained staff will use fire suppression equipment and all other staff will evacuate the Site.</li> <li>For fire during non-operational hours, the Fire and Rescue Services may be called.</li> <li>The Fire and Rescue Service will be contacted to suppress larger fires.</li> </ol> <p>The Fire and Rescue Service may connect to offsite hydrants using hoses to suppress larger fires on Site.</p> <p><b><u>Containment of Fire</u></b></p> <ol style="list-style-type: none"> <li>Fires are contained by preventing its spread. The waste quarantine bin will contain the fire until suppressed.</li> </ol>	RESPONSIBLE PERSON	RECORD
	Site Manager	Appendix A.3 Fire Prevention Plan

ISSUE No: 1  
ISSUE DATE: 31/01/2023  
REVISION No: 0  
REVISION DATE:  
REASON FOR REVISION:




	<b>ENVIRONMENTAL MANAGEMENT SYSTEM- UK</b>	<b>EM 4.7</b>
<b>Emergency / Abnormal Conditions</b>		
<b>LEGAL REQUIREMENT:</b> Environmental permitting regulations 2016.		
<i>Purpose: To ensure all staff are prepared in the event of an emergency or abnormal condition.</i>		
<p><b><u>Emergency / Abnormal Conditions</u></b></p> <ol style="list-style-type: none"> <li>For all emergency and abnormal conditions, the Site Manager will determine if operations can continue. If safe to do so, the continuation of operations is the preferred option.</li> <li>For some emergency and abnormal conditions, the Site Manager will obtain incident specific information before deciding if operations can continue.</li> <li>For some emergency and abnormal conditions, information can be obtained in advance allowing the Site Manager to make a proactive, informed decision about managing Site operations and implementing any control measures to facilitate the continuation of Site Operations.</li> <li>Some of the emergency and abnormal operations will require Government regulator e.g., the Environment Agency, Natural Resource Wales, Scottish Environmental Protection Agency and HSE.</li> </ol> <p><b><u>Preparation for an Emergency or Abnormal Conditions</u></b></p> <ol style="list-style-type: none"> <li>Key contacts in the event of an emergency or abnormal condition can be found in Form No. 4.3a Key Contacts.</li> <li>Elis UK Limited retains customer contact details so they can communicate with them in the event of emergency or abnormal conditions.</li> <li>Staff and customers will be made aware of any planned shutdowns in advance.</li> </ol> <p><b><u>During an Emergency or Abnormal Condition</u></b></p> <ol style="list-style-type: none"> <li>Emergency and abnormal conditions are:             <ul style="list-style-type: none"> <li>Aviation crash</li> <li>Train or Tram crash</li> <li>Bridge collapse or severe road accident</li> <li>Offsite explosion/fire</li> <li>Onsite fire</li> <li>Seismic activity</li> <li>Stormwater and offsite flooding</li> <li>Onsite flooding</li> <li>Spillage</li> </ul> </li> </ol>	<p><b>RESPONSIBLE PERSON</b></p> <p>Site Manager</p> <p>Site Manager</p> <p>Site Manager</p> <p></p> <p></p> <p>Site Manager</p>	<p><b>RECORD</b></p> <p></p> <p></p> <p></p> <p></p> <p>Form No. 4.3a Key Contacts</p>

	RESPONSIBLE PERSON	RECORD
<ul style="list-style-type: none"> <li>• Protester and Industrial action</li> <li>• Disease/pandemic</li> <li>• Loss of telecommunications i.e., landlines, mobile phones, and internet</li> <li>• Water supply failure</li> <li>• Electrical supply failure</li> <li>• Non-operational third-party haulier/Off-take facility</li> <li>• Severe accident or personal injury</li> <li>• Security Incident</li> </ul>		
9. Potential impacts from identified emergency and abnormal conditions can include:		
<ul style="list-style-type: none"> <li>• Damage to Site infrastructure</li> <li>• Damage to local road network</li> <li>• Injury and death to staff, third parties and/or emergency services</li> <li>• Pollution of air, land, drains, groundwater, and surface water features</li> <li>• Less effective communication between staff and to customers</li> <li>• Breach of the Environmental Permit and associated documents</li> <li>• Cessation of incoming material</li> <li>• Theft</li> </ul>		
10. For all emergency and abnormal conditions, the Site Manager will determine if operations can continue. If safe to do so, the continuation of operations is the preferred option.	Site Manager	
If operations can continue:		
<ul style="list-style-type: none"> <li>• The Site Manager will inform Site staff</li> <li>• If necessary, customers will be informed of continued operation of the Site</li> <li>• Site staff and customers will be informed if alternative transport routes are needed to access the Site.</li> </ul>		
If operations cannot continue:		
<ul style="list-style-type: none"> <li>• The Site Manager will inform Site staff that they need to leave Site</li> <li>• Staff member to inform incoming vehicles of the closure and divert away from Site.</li> <li>• Inform customers of the cessation of Site operations</li> <li>• Alternative Sites will be identified to customers if possible.</li> </ul>		
The relevant environmental regulator will be informed of Site closure.		
<b><u>Recovery after an Emergency or Abnormal Condition</u></b>		
11. The Site will only be re-entered once deemed safe by the Site Manager.	Site Manager	
12. The insurance provider may be contacted depending on the severity of the impact.	Director Site Manager	Form No. 4.3a Key Contacts
13. A suitably licensed contractor will remove any debris, caused by the emergency/abnormal condition, that may be on Site	Director Site Manager	
14. If documentation is lost or destroyed it should be replaced, there should be back-up copies in accordance with the Site Security Procedure.	Director Site Manager	Procedure No. 3.3 Site Security

	RESPONSIBLE PERSON	RECORD
<b><u>After Incident Report</u></b>		
15. After the emergency or abnormal condition, the Site Manager will complete an after-incident report. This internal document will help strengthen the response to an emergency or abnormal condition in the future and improve business continuity.	All	Procedure No. 1.1 Training, Awareness and Competence

## 5 Reporting

ISSUE No: 1  
ISSUE DATE: 21/06/2022  
REVISION No: 0  
REVISION DATE:  
REASON FOR REVISION:

	<b>ENVIRONMENTAL MANAGEMENT SYSTEM- UK</b>	<b>EM 5.2</b>										
<b>Notifications to Regulators</b>												
<b>LEGAL REQUIREMENT:</b> Environmental permitting regulations 2016.												
<i>Purpose: To ensure the relevant environmental regulators are notified on issues required by the Environmental Permit.</i>												
<ol style="list-style-type: none"> <li>1. A Notification is submitted to the regulator in the event of the following incidents:             <ul style="list-style-type: none"> <li>• Malfunction, breakdown or failure of equipment or techniques, accident, or emissions of a substance not controlled by emission limits which has caused, is causing or may cause significant pollution.                 <ul style="list-style-type: none"> <li>• Table (a) is completed for this incident.</li> </ul> </li> <li>• The breach of an emissions limit specified in the permit.                 <ul style="list-style-type: none"> <li>• Tables (b) are completed for this incident.</li> </ul> </li> <li>• Any significant adverse environmental effect.                 <ul style="list-style-type: none"> <li>• Tables (c) are completed for this incident.</li> </ul> </li> </ul> </li> <li>2. Part A of the Notification including tables (a), (b) or (c) is submitted to the regulator within 24 hours of detection.</li> <li>3. Part B is completed and submitted to the relevant environmental regulator as soon as practicable.             <p>Part B should include additional information regarding the incident of beyond what was provided in tables (a), (b) or (c):</p> <ul style="list-style-type: none"> <li>• Measures taken to prevent reoccurrence,</li> <li>• Measures taken to prevent environmental impact of the incident and any similar occurrence within the preceding 24 months.</li> </ul> </li> <li>4. If required, during normal working hours, the local environmental officer will be contacted. Outside of normal working hours the environmental authority will be notified on the 24 hour line.</li> </ol>	<table border="1"> <thead> <tr> <th>RESPONSIBLE PERSON</th> </tr> </thead> <tbody> <tr> <td>Site Manager</td> </tr> <tr> <td>Site Manager</td> </tr> <tr> <td>Site Manager</td> </tr> <tr> <td>Site Manager</td> </tr> </tbody> </table>	RESPONSIBLE PERSON	Site Manager	Site Manager	Site Manager	Site Manager	<table border="1"> <thead> <tr> <th>RECORD</th> </tr> </thead> <tbody> <tr> <td></td> </tr> <tr> <td>Form No 5.2a Notification Form</td> </tr> <tr> <td>Form No 5.2a Notification Form</td> </tr> <tr> <td>Form No. 4.3a Key Contacts</td> </tr> </tbody> </table>	RECORD		Form No 5.2a Notification Form	Form No 5.2a Notification Form	Form No. 4.3a Key Contacts
RESPONSIBLE PERSON												
Site Manager												
Site Manager												
Site Manager												
Site Manager												
RECORD												
Form No 5.2a Notification Form												
Form No 5.2a Notification Form												
Form No. 4.3a Key Contacts												

**Form No. 5.2a Notification Form****Part A**

Permit Number	
Name of Operator	Elis UK Limited
Location of Facility	
Time and Date of the Detection	

<b>(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution.</b>	
To be notified within 24 hours of detection	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into environment took place	
Substance(s) potentially released	
Best estimate of the quantity or rate of release of substance(s)	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident	

<b>(b) Notification requirements for the breach of a limit</b>	
To be notified within 24 hours of detection unless otherwise specified below	
Emission point reference/source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop emission	

<b>(b) Time periods for notification following detection of a breach of a limit</b>	
Parameter	Notification Period

<b>(c ) Notification requirements for the detection of any significant adverse environmental effect</b>	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected.	
Substance(s) detected.	
Concentrations of substance(s) detected.	
Date of monitoring / sampling.	



## Part B- to be submitted as soon as practicable

Any more accurate information on the matters for notification under part A.	
Measures taken, or intended to be taken, to prevent reoccurrence of the incident.	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission.	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

\*Authorised to sign on behalf of the operator.



## **Appendix 6**

### Evidence of Technically Competent Management



CIWM

CIWM (WAMITAB)  
Qualifications



# HSEC Services

PROVIDING A BESPOKE WASTE MANAGEMENT EXPERIENCE



01502 712209



6b The Walk, Beccles, Suffolk NR34 9AJ

info@hsecservices.co.uk



www.hsecservices.co.uk

Mr Robert Sean Goldsworthy  
Elis UK Limited  
Intec 3  
Wade Road  
Basingstoke  
RG24 8NE

Date: 07/07/2022

**Notification of Registration with CIWM (WAMITAB) and Health, Safety & Environmental Compliance Services Limited.**

Dear Mr Robert Sean Goldsworthy

We are pleased to confirm that you have been registered with Health, Safety & Environmental Compliance Services Ltd and the Awarding Organisation "CIWM (WAMITAB)" for the below award / unit:

✓ **MROC16:** CIWM (WAMITAB) Level 4 Medium Risk Operator Competence for Non-Hazardous Clinical Waste Transfer

Please see below registration numbers and dates that you will be required to provide, when contacting either the Centre or the Awarding Organisation – CIWM (WAMITAB).

- ✓ Centre Delegate Number: H00432S
- ✓ CIWM (WAMITAB) Registration Number: 124172
- ✓ CIWM (WAMITAB) Registration Date: 06/07/2022
- ✓ Expiry Date: 06/07/2024

You now have 24 months from the above mentioned CIWM (WAMITAB) registration date to achieve your chosen award.

Your allocated Assessor will in touch over the coming weeks to schedule your induction. The Assessor will bring your portfolio and associated qualification materials to the meeting, as well as a hard copy of this letter and "HSEC0008 - Proof Of Registration Form", which contains your registration information, as well as contact information for your allocated Assessor and Internal Quality Assurer.

Please let us know if any information transmitted to you, such as address and most importantly names are incorrect as this is how your name will appear on any certificate claimed. Additionally if any personal information changes such as home address or place of work please contact [admin@hsecservices.co.uk](mailto:admin@hsecservices.co.uk) at your earliest opportunity, or alternatively complete "HSEC0155 – Change of details" which can be sent via a postal service and can be found in section 2 of your portfolio.

These details will remain on file for the duration of your chosen qualification and for a period as outlined in "HSEC0023 - GDPR Policy".

Good luck in the completion of your qualification, remember if you need anything or you have any queries don't hesitate to contact us.

Yours sincerely

*B. Saville*

Ben Saville  
Director / Centre Manager



Company Registration Number: 1123 7054



VAT Registration Number: 9467 63185



CIWM

CIWM (WAMITAB)  
Qualifications



HSEC Services



01502 712209



6b The Walk, Beccles, Suffolk NR34 9AJ

info@hsecservices.co.uk



[www.hsecservices.co.uk](http://www.hsecservices.co.uk)

Mr Robert Sean Goldsworthy  
Elis UK Limited  
Intec 3  
Wade Road  
Basingstoke  
RG24 8NE

Date: 29/06/2022

**Notification of Registration with CIWM (WAMITAB) and Health, Safety & Environmental Compliance Services Limited.**

Dear Mr Robert Sean Goldsworthy

We are pleased to confirm that you have been registered with Health, Safety & Environmental Compliance Services Ltd and the Awarding Organisation "CIWM (WAMITAB)" for the below award / unit:

- ✓ **Award:** CIWM (WAMITAB) Level 4 Certificate In waste and Resource Management – VRQ
- ✓ **Optional Unit 1:** VRQ406 – Principles and practices of managing a physical treatment processing facility (Transfer and Treatment of non-hazardous waste)

Please see below registration numbers and dates that you will be required to provide, when contacting either the Centre or the Awarding Organisation – CIWM (WAMITAB).

- ✓ **Centre Delegate Number:** H00432S
- ✓ **CIWM (WAMITAB) Number:** 124172
- ✓ **CIWM (WAMITAB) Registration Date:** 29/06/2022
- ✓ **Expiry Date:** 29/06/2023 – (Please do not input the expiry date into your question papers)

You now have 12 months from the above mentioned CIWM (WAMITAB) registration date to achieve the award. Should reregistration be required after this period, all work supplied and marked will be carried over, however this is subject to our terms and conditions and an additional reregistration fee will be incurred.

Prior to making any submission to [admin@hsecservices.co.uk](mailto:admin@hsecservices.co.uk) please ensure the above information is inserted into the top of each unit question paper (Section 1. Delegate). Please also ensure that you read the declaration page for each unit question paper "Declaration and Notes for Delegates" prior to signing section 2.

Please let us know if any information transmitted to you, such as address and most importantly names are incorrect as this is how your name will appear on any Certificate claimed. Additionally, if any personal information changes such as home address, place of work or names please contact [admin@hsecservices.co.uk](mailto:admin@hsecservices.co.uk) at your earliest opportunity, or alternatively complete "HSEC0055 – Change of details" which can be sent via a postal service and can be found at the back of section 2 in your portfolio.

These details will remain on file for the duration of your chosen qualification and for a period as outlined in "HSEC0023 - GDPR Policy".

Good luck in the completion of your qualification, remember if you need anything or you have any queries don't hesitate to contact us.

Yours sincerely

*B. Saville*

Ben Saville

Director / Centre Manager



Company Registration Number: 1123 7054



VAT Registration Number: 9467 63185