



# **ENVIRONMENTAL PERMIT MANAGEMENT SYSTEM MANUAL**

**Environmental and sustainability solutions provided to  
BRYN RECYCLING LTD**



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## CONTENTS

<b>1.0</b>	<b>INTRODUCTION .....</b>	<b>1</b>
<b>2.0</b>	<b>SITE DETAILS .....</b>	<b>2</b>
2.1	Site Address.....	2
2.2	Operational Location .....	2
2.3	Site Description.....	2
2.4	Plans.....	3
2.5	Permits .....	3
2.6	Planning History .....	3
2.7	Calculated Capacity.....	3
<b>3.0</b>	<b>PURPOSE OF WORK.....</b>	<b>3</b>
3.1	Exempt Activities .....	4
3.2	Hours of Operation .....	5
<b>4.0</b>	<b>STAFFING, ROLES &amp; RESPONSIBILITIES AND COMPETENCE.....</b>	<b>5</b>
4.1	Staff.....	5
4.2	Training .....	6
4.3	Competence.....	6
4.4	Site Identification Board.....	7
4.5	Site Security .....	7
4.6	Reporting to Natural Resources Wales .....	7
<b>5.0</b>	<b>SITE ENGINEERING.....</b>	<b>8</b>
5.1	Access and Parking.....	8
5.2	Site Office.....	8
5.3	Site Operational Area .....	8
5.4	Storage Area .....	9
<b>6.0</b>	<b>OPERATIONAL PROCEDURES.....</b>	<b>9</b>
6.1	Document Control .....	9
6.2	Operational Monitoring .....	10
6.3	Complaints.....	11
6.4	Contingency .....	11

6.5	Compliance Audit .....	11
6.6	Management Review .....	11
<b>7.0</b>	<b>SITE PROCEDURES .....</b>	<b>12</b>
7.1	Waste Acceptance.....	12
7.2	Waste Rejection .....	12
7.3	Waste Recovery .....	12
<b>8.0</b>	<b>POLLUTION CONTROL.....</b>	<b>12</b>
8.1	Infrastructure Maintenance .....	12
8.2	Maintenance .....	13
8.3	Emissions.....	13
8.4	Odour.....	13
8.5	Spills .....	13
8.6	Contamination .....	13
8.7	Noise and Vibration .....	14
<b>9.0</b>	<b>RECORDS.....</b>	<b>14</b>
9.1	Monitoring.....	14
9.2	Site Diary .....	14
9.3	Waste Acceptance Records.....	15
9.4	Training Records.....	15
9.5	Site Waste Returns .....	15
9.6	Complaints.....	15
9.7	Site Operations .....	16

## 1.0 INTRODUCTION

This Management System has been prepared in accordance with the Environmental Permitting Regulations 2016 (England and Wales). The Management System sets out the considerations that are relevant to the recovery of up to 420,000m<sup>3</sup> of inert waste material by Bryn Recycling Ltd (hereon referred to as Bryn Recycling) at Gelliargwellt Farm. It details the nature of the site, relevant site and infrastructure works, methods of operation and environmental controls. The inert waste material will be permanently recovered at Gelliargwellt Farm over a period of approximately 5 years.

The inert waste material will be permanently recovered for the extension of the materials processing and storage yard at the existing Materials Recycling Facility and for the creation of a screening bund surrounding the southern and southwestern boundaries of this storage yard. These operations are required to enable higher recycling rates from the material being received at the MRF.

This document has been produced in conjunction with the following documents:

- BRY-A01 Waste Recovery Plan
- BRY-A02 Non-Technical Summary
- BRY-A03 Site Condition Report
- BRY-A04 Environmental Setting and Site Design Report
- BRY-B02 Environmental Risk Assessment
- BRY-B03 Dust Management Plan
- BRY-B04 Fugitive Emissions Management Plan
- BRY-B05 Noise & Vibration Management Plan
- BRY-B06 Accident Management Plan
- BRY-OP01 Environmental Permit Reporting
- BRY-OP02 Waste Acceptance Procedure
- BRY-OP03 Waste Recovery Procedure
- BRY-OP04 Maintenance Schedule
- BRY-OP05 Monitoring Schedule
- BRY-OP06 Recording Procedure

## 2.0 SITE DETAILS

### 2.1 Site Address

Bryn Recycling Ltd  
Gelliargwellt Farm,  
Gelligaer Rd,  
Hengoed  
CF82 8FY

### 2.2 Operational Location

Site Grid Reference: ST 12393 96501

### 2.3 Site Description

Gelliargwellt Farm is located near the village of Gelligaer, near Caerphilly. Access to the site is gained via Gelligaer Road. The primary vehicle access is from Gelligaer Road, which is located to the northwest of the site. It also connects neighbouring towns including Gelligaer and Penpedairheol which are located approximately 800m and 2,000m respectively, to the northeast of the site. Penybryn is located approximately 1,300m to the east, with the Penallta Industrial Estate located slightly further east. Caerphilly is located approximately 8.5km south of the site. In the immediate vicinity of the site are light industries connected with waste and recycling activities whilst the area beyond is largely agricultural in nature.

The site is bound to the south by agricultural land and Parc Penallta Country Park, which comprises an area of public open space and woodland is located approximately 850m to the southeast. Nelson Bog Site of Special Scientific Interest (SSSI) is located 550m to the southeast of the site. Waun Rydd Site of Importance for Nature Conservation (SINC) is located to the east of the site and Coed Gelliau'r – Gwellt SINC is located immediately adjacent (west) to the site and comprises an ancient woodland.

The wider farm site contains an anaerobic digestion facility to the north of the deposit for recovery site with a sandstone quarry to the east. Immediately east of the site is a Materials Recycling Facility (MRF). Part of the deposit for recovery site lies within the permit boundary of the MRF (permit reference number EPR/WB3993HE).

The deposit for recovery site is largely agricultural in nature, used for grazing cattle, and it has an area of approximately 64,500m<sup>2</sup>.

## 2.4 Plans

Reference Drawings: EPR\_001 Site Location Plan  
EPR\_002 Site Layout Plan

## 2.5 Permits

Bryn Recycling hold a Bespoke Environmental Permit for the recovery of 420,000m<sup>3</sup> of waste. The waste will be recovered on the land for the extension of the materials processing and storage yard at the existing Materials Recycling Facility and for the creation of a screening bund surrounding the southern and southwestern boundaries of this storage yard. The Materials Recycling Facility operates under an environmental permit (permit reference number EPR/WB3003HE).

## 2.6 Planning History

Planning permission was previously granted for the permanent operation of the MRF together with the erection of a new processing building and associated material storage bays (APP/K6920/A/12/2173010 – LPA Ref 11/0226/FULL) in 2012.

An application for planning permission for the extension of the materials processing and storage yard and for the creation of a screening bund surrounding the southern and southwestern boundaries of this storage yard was submitted on 24/06/2022 and was validated on 27/06/2022 (reference number 22/0567/FULL).

## 2.7 Calculated Capacity

Up to 420,000m<sup>3</sup> of inert waste in total will be imported onto the site for recovery.

The materials that will be used within this proposed development are wastes that have been brought to site directly by small local landscaping contractors or utility companies via the MRF, anticipated to be mostly soils and stones. This equates to approximately 672,000 tonnes (using a conversion factor of 1.6 tonnes per m<sup>3</sup>).

## 3.0 PURPOSE OF WORK

Bryn Recycling propose to recover approximately 420,000m<sup>3</sup> or 672,000 tonnes (using a conversion factor of 1.6 tonnes per m<sup>3</sup>) of inert waste material for the extension of the existing material processing and storage yard at the MRF and creation of a screening bund to the south and southwest at Gelliargwellt Farm. An additional 3,000 tonnes of non-waste (PAS 100



accredited compost) will be used as a top layer on the screening bund to provide a growing medium for the planting of native broadleaf woodland linking to the existing Coed Gelliau'r-gwellt to the south and west. However, these 3,000 tonnes of compost are not considered in this WRP on the basis that it is not a waste material. This WRP and associated bespoke environmental permit application seeks to enable Bryn Recycling to make improvements to the way in which recycled material is stored which will increase the quality and recovery rate of sorted and recovered recycled materials and the proposed landscape bund would also provide better screening of the fire prevention wall serving the MRF.

The waste will be recovered in line with the requirements set out in this permit. Waste accepted onto site, following the strict protocols in the Waste Acceptance procedure which makes up part of the environmental management system, will be immediately deposited at its final location using a shovel loader and other agricultural and construction vehicles. If waste materials were not used, then non-waste materials would be used instead. The most likely source of an alternative would be to purchase virgin or recycled aggregates, clays and subsoil. These materials will likely come at a higher environmental cost.

The materials that will be used within this proposed development are wastes that have been brought to site directly by small local landscaping contractors or utility companies via the MRF. These wastes will not contain any hazardous materials. The recovery of discarded material is justifiable as it potentially diverts waste that would normally be going to landfill for disposal.

The work proposed in this application is for the purpose of creating a level area on which the existing MRF processes could be extended by means of a material processing and storage yard. In order to do this, the profile of the land on which the processing and storage would be needs to be altered to create a plateau. This would be done by means of steepening the existing hillslope in the form of a bund to create a plateau at the top. The bund will not only screen the extended material processing and storage yard and help to reduce the risk of fugitive releases from the extended area but it will also help to visually screen some of the existing infrastructure on the wider farm site.

The list of the allowable waste inputs onto site can be seen in *BRY-OP02 Waste Acceptance*.

### 3.1 Exempt Activities

Bryn Recycling do not currently undertake any exempt activities on the site.

### 3.2 Hours of Operation

Site operational hours for the facility will be as identified below:

**Table 1 - Operational Hours**

Day(s)	Hours
Monday to Friday	07:00 and 18:00
Saturday	07:00 and 13:00
Sunday and Bank Holidays	Closed

## 4.0 STAFFING, ROLES & RESPONSIBILITIES AND COMPETENCE

Bryn Recycling shall ensure that sufficient personnel, who are suitably trained and competent, are present to manage and operate the site safely and without causing pollution. Personnel must be fully familiar with the requirements of the Permit as is relevant to their specific duties. Personnel shall have clearly defined roles and responsibilities.

The site is operated under the ultimate control of the site's owner, and day to day responsibility rests with the Site Manager, Jennifer Price. The facility has 54 full time employees. Staff numbers are maintained at a level sufficient to operate and supervise the waste recovery operations effectively and throughout periods of employee sickness and holidays.

### 4.1 Staff

The Site Manager and operatives will be appropriately trained and will be conversant with the requirements of the Environmental Permit and Management System, with particular regard to:

- Waste acceptance/rejection procedures;
- Operational controls;
- Carrying out landscaping, construction and levelling activities;
- Undertaking regular inspections to ensure the site is safe;
- Reporting any machinery defects and faults to the Site Manager;
- Reporting any incidents, dangerous occurrences and near misses to senior staff; and,
- Notification to regulatory authorities.

A copy of the Environmental Permit and Management System will be kept at the site office and will be readily available for reference by site staff, other company staff, and regulatory authorities.

## 4.2 Training

Bryn Recycling shall provide the necessary training for staff to carry out their roles safely. Records of training shall be retained on the site.

Training should be reviewed annually, at a minimum, and more frequently if a need for training becomes apparent.

## 4.3 Competence

A designated person will hold a suitable qualification in order to operate the site compliantly (see Table 2 below). The suitably qualified person's actual attendance hours on site will be recorded in the Site Diary.

**Table 2 - Technical Competence Qualifications**

Name	Qualification
Jennifer Price	LIN – Open Inert Landfill – CIWM (WAMITAB) Level 4 Medium Risk Operator Competence for Non- Hazardous Waste Treatment and Transfer (MROC1)

The requirement is for a Technical Competent Manager (TCM) to be present for at least 8 hours per week. If the TCM is not available for the required minimum period, an alternative TCM will provide management cover.

Any changes in technically competent management at the site, and/or the name of any incoming personnel, together with any evidence that such personnel has required technical competence, shall be submitted to the Natural Resource Wales within 5 working days of change in management. No site operations shall take place unless there is sufficient, trained and competent staff on site.

#### 4.4 Site Identification Board

In conformance with permitting regulations and the Management System, Bryn Recycling shall display a clear, all-weather, easily readable Site Notice at or near the entrance to the site. The Site Sign/Notice shall contain the following information:

- Company Name
- Permit Holder's Name
- Emergency Contact Name
- Permit Holder's Telephone Number
- Statement that the site is permitted by Natural Resource Wales
- The Permit Number
- NRW Telephone Numbers

The Identification Board shall be inspected at least once per week. In the event of damage or defect, the board shall be repaired or replaced within three working days.

#### 4.5 Site Security

The Gelliargwell Farm site has a chain link fence surrounding it with a gate at the site entrance which is locked when the site is closed. The main Gelliargwell Farm, on which the site office is located is secured with gates and fences to prevent access. The facility is also situated within a largely agricultural location.

All security measures will be subject to visual inspection by a trained operative. Any defects will be recorded in the site diary and rectified in the appropriate manner.

The boundary is checked on a regular basis for damage or signs of attempted entry. Such occurrences are entered in the site diary and any damage is repaired at the earliest opportunity.

All visitors will be required to sign in at the main farm Site Office on arrival and exiting the site.

#### 4.6 Reporting to Natural Resources Wales

All reporting required by the following shall be carried out in accordance with Environmental Permit Reporting. This shall include but is not limited to:

- Relevant convictions;
- Change of holder's or operator's details;

- Site performance and waste return information; and,
- Occurrence of an environmental incident.

## 5.0 SITE ENGINEERING

### 5.1 Access and Parking

The primary vehicle access is from Gelligaer Road, which is located to the northwest of the site. It also connects neighbouring towns including Gelligaer and Penpedairheol which are located approximately 800m and 2,000m respectively, to the northeast of the site. Parking facilities are provided on the approach to site.

### 5.2 Site Office

The site office is located on Gelliargwellt Farm. A printed copy of the environmental permit and Management System will be held in the site office. Toilets and washing facilities are provided.

The following information and equipment will be kept in the site office:

- Environmental permit;
- Management System;
- Emissions Management and Monitoring Plan;
- Current site diary;
- Visitor's book recording all visitors to the site;
- First aid kit;
- Conditions of site use for employees, visitors and contractors;
- In-house inspection sheets/monitoring forms;
- Accident book and first aid kit.

### 5.3 Site Operational Area

The deposit for recovery site is largely agricultural in nature, used for grazing cattle, and it has an area of approximately 64,500m<sup>2</sup>.



**Figure 1 - Aerial view of Gelliargwellt Farm**

#### **5.4 Storage Area**

Following waste acceptance , the material will be deposited immediately in the specific area of use to be shaped into the appropriate form.

### **6.0 OPERATIONAL PROCEDURES**

Site operations are carried out as per Section 3.0. The operational procedures are deemed appropriate for the site processes.

#### **6.1 Document Control**

All documents within the management system for the environmental permit shall be retained electronically, with physical copies retained onsite for reference. An electronic copy of all records shall also be maintained off-site on a separate computer system.

Access to the documents shall be controlled by the Site Manager and distributed in PDF format as required, following authorisation. Each document shall contain the relevant issue number and date on the front cover, quality control page and within page headers.

All documents shall be reviewed annually. If, at review, an amendment is required, the issue number, date and the description of change box on the quality control page shall be updated. If, at review, no amendment is required, the date is to be updated but issue number is to stay the same and the description of change box is to be updated with 'reviewed, no change'.

All documents which form the management system are as stipulated within Table 3 below.

**Table 3 - Document Control Table**

Document Reference	Document Title	Issue Number	Issue/Reviewed Date
BRY-B01	Permit Manual	2.0	24/10/2024
BRY-B02	Environmental Risk Assessment	3.0	24/10/2024
BRY-B03	Dust Management Plan	2.0	24/10/2024
BRY-B04	Fugitive Emissions Management Plan	1.0	24/08/2023
BRY-B05	Noise & Vibration Management Plan	1.0	24/08/2023
BRY-B06	Accident Management Plan	1.0	24/08/2023
BRY-OP01	Environmental Permit Reporting Procedure	1.0	24/08/2023
BRY-OP02	Waste Acceptance Procedure	2.0	24/10/2024
BRY-OP03	Waste Recovery Procedure	1.0	24/08/2023
BRY-OP04	Maintenance Schedule	1.0	24/08/2023
BRY-OP05	Monitoring Schedule	1.0	24/08/2023
BRY-OP06	Recording Procedure	1.0	24/08/2023

## 6.2 Operational Monitoring

Bryn Recycling shall undertake the monitoring as specified within BRY-OP05 Monitoring Schedule.

### 6.3 Complaints

Bryn Recycling shall determine and implement any necessary action in response to complaints or concerns raised by interested parties, including operatives, customers, clients, members of the public and regulatory authorities. All complaints shall be investigated and documented. The following shall be documented:

- Name and contact details of the person who expressed concern or made a complaint;
- Specific subject(s) of the concern or complaint;
- The source / location of where the complaint comes from;
- Date and time communicated to the producer and name of the person to whom it was communicated;
- Nature and date(s) of any actions and checks and who carried them out;
- Nature and date of any response to the person who expressed a concern or made the complaint; and;
- Name of the person who communicated the response.

### 6.4 Contingency

In the event that one source of inert waste ends, another source that meets the requirements of the permit and restoration plan would be found. Likewise, if a waste haulier used to bring waste onto site was no longer able to perform the duty, an alternative haulier would be found that had the requisite permissions and consents. If Bryn Recycling are unable to find either an alternative waste provider or waste carrier cannot be found, the site will cease accepting waste until one can be found.

### 6.5 Compliance Audit

Bryn Recycling shall ensure that all documents included in the management system for the waste permit are reviewed at least annually as part of an annual compliance audit. Documents should be reviewed early if either of the following occur:

- An environmental pollution event occurs; or
- An element of the waste transfer operation changes.

### 6.6 Management Review

Following the compliance audit, a management review shall be conducted. The management review should take place with company directors annually. All aspects of the audit results



should be covered during this review, including any complaints or incidents that have occurred on site over the previous year; a management plan should then be put in place to mitigate these issues going forward. The management review should also consider the measure in place to ensure that the waste used is produced and recovered in accordance with the waste hierarchy in Article 4 of the Waste Framework Directive. Records of the management review should be recorded and maintained.

## 7.0 SITE PROCEDURES

### 7.1 Waste Acceptance

Bryn Recycling will follow a strict pre-acceptance and waste acceptance procedure to ensure that only waste that fits the EWC codes allowed in the permit are accepted onto the site. *BRY OP02 Waste Acceptance Procedure* details the site's pre-acceptance and waste acceptance procedures and provides a full list of the waste types permitted to be accepted onto the site.

### 7.2 Waste Rejection

Wastes will be rejected immediately if they do not match one of the codes allowed in the environmental permit, or upon inspection do not match the assigned EWC code. Further details of the waste rejection procedure are given in *BRY OP02 Waste Acceptance Procedure*.

### 7.3 Waste Recovery

All waste accepted onto site, following the strict protocols in the Waste Acceptance procedure, will be directed to its final location by the site manager or the site operatives. Here, the operator will inform the driver as to where to unload the waste. All waste will be immediately deposited at its final location using a shovel loader and other construction vehicles. The recovery will follow the technical plans produced by the appropriately qualified person as part of the application for the environmental permit. Further information is given in *BRY - OP03 Waste Recovery Procedure*.

## 8.0 POLLUTION CONTROL

### 8.1 Infrastructure Maintenance

Please refer to *BRY-OP04 Maintenance Schedule* for frequency and description of required infrastructure maintenance.

## 8.2 Maintenance

Please refer to *BRY-OP04 Maintenance Schedule* for details of plant maintenance. Please note, the site operates a strict maintenance regime and all equipment used is of sufficient capacity to allow down time for routine maintenance and servicing as recommended by the manufacturer.

No plant may be operated unless full instructions and training have been given by a person competent to do so (see: Section 4.0).

## 8.3 Emissions

Emissions of substances not controlled by emission limits shall not cause pollution. Suitable measures shall be taken to prevent, where possible, and minimise emissions. These measures are detailed in *BRY-B04 Fugitive Emissions Management Plan*.

## 8.4 Odour

Emissions from the permitted activities relating to importing and recovering waste materials shall be free from odour at levels likely to cause pollution outside the site. Appropriate measures shall be taken to prevent, and if where not practicable, minimise odours.

## 8.5 Spills

Liquid wastes will not be accepted onto site. Should a load of liquid waste be brought onto site, it will be immediately rejected.

Any spillages of solid waste will be dealt with immediately through the use of a shovel loader.

Bryn Recycling will hold a spill kit on the site for use in the case of liquid spillages from a vehicle e.g. an oil leak. All spillages will be dealt with immediately. All plant and equipment used on site are operated and maintained in line with *BRY-OP04 Maintenance Schedule*, with one of the objectives preventing environmentally harmful leaks from occurring.

## 8.6 Contamination

Waste shall only be accepted if the waste is classified as inert and the following conditions have been satisfied:

- Appropriate measures have been taken to ensure that the waste is free from contamination;

- It has been identified as suitable waste for this use in the approved waste recovery plan; and,
- Its chemical, physical and biological characteristics make it suitable for its intended use on the site.

## 8.7 Noise and Vibration

Emissions from the waste activities on site shall not produce noise or vibrations at levels that are likely to create pollution outside the site.

Emissions of noise and vibration shall not cause pollution. Suitable measures shall be taken to prevent, where possible, and minimise emissions of noise. These measures are detailed in *BRY-B05 Noise and Vibration Management Plan*.

## 9.0 RECORDS

Bryn Recycling shall maintain records on site in line with *BRY-OP06 Recording Procedure* as well as the following section.

All records required as part of this permit shall:

- be legible;
- be recorded as soon as practicable;
- if amended, be amended so that the original and any amendments are still legible or are easily retrievable; and,
- be retained for a minimum of 6 years from the date the records were written.

Records, plans and the management system shall be held by the Bryn Recycling's site operator.

### 9.1 Monitoring

Bryn Recycling will undertake regular monitoring in line with *BRY-OP05 Monitoring Schedule*.

### 9.2 Site Diary

A Site Diary shall be maintained and retained in the site office. It shall record visitors, non-routine activities and other incidents. The permit holder shall check the Site Diary periodically to ensure its correct use. The Site Diary shall be readily available for inspection. Examples of activities recorded in the site diary include:

- Names of visitors onsite;
- Names of technically competent managers onsite;
- Any accidents resulting in injury;
- Any incident of fire;
- Any spillage incident;
- Any incidents causing pollution to the environment, harm to human health or detriment to the amenities of the locality;
- Any machinery breakdown;
- Any deposit of unsuitable waste at the site; and
- Incidence of litter, dust, pest, odour and noise problem.

### 9.3 Waste Acceptance Records

Records of all loads of waste received on the site shall be recorded and retained for a minimum of six years. The records shall include:

- Date of waste receipt;
- Volume / mass received;
- Source of waste;
- Time of delivery; and
- EWC code of waste.

### 9.4 Training Records

The Site Manager is responsible for reviewing and identifying training needs in relation to policies, objectives and operational procedures. Bryn Recycling shall maintain a record of all training undertaken by employees of the organisation. Any new staff joining Bryn Recycling will be required to undertake training as part of an induction.

### 9.5 Site Waste Returns

Quarterly returns shall be provided and stored at the site office in line with Environment Agency regulations. The reporting requirement shall be addressed through *BRY-OP01 - Environmental Permit Reporting Procedure*.

### 9.6 Complaints

Records of complaints should be maintained so that all complaints are traceable. The records

of complaints that Bryn Recycling receive shall be retained securely for a minimum of six years.

### 9.7 Site Operations

Records should be maintained so that all materials are traceable. The following records will be retained as required:

- Waste acceptance records;
- Waste rejection records;
- Analysis results;
- Tonnages of material brought onto site; and,
- Maintenance records.