

Summary of Management Systems

Morris & Co (Handlers) Ltd

Neath Abbey Wharf

Skewen

Neath

Castell-nedd Port Talbot

SA10 6BL

Permit number: Application submitted October 2018

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**THIS IS NOT A LIVE DOCUMENT - WRITTEN IN PREPERATION FOR THE SITE TO
OPERATE UNDER AN ENVIRONMENTAL PERMIT.**

Revision History

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1 - INTRODUCTION

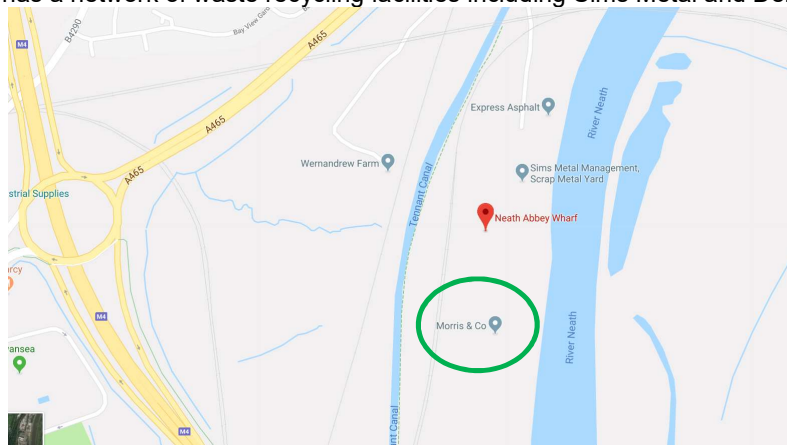
The site currently operates 3 core documents relating to mitigating environmental risks within the company's environmental management system:

- Summary of Management Systems - this document highlights the steps taken to control day to day environmental risks.
- Accident Management Plan – this document considers the company's response to accidents on site.
- Fire Prevention & Mitigation Plan – this document identifies the potential Environmental hazards with a review to meeting the 3 National Resources Wales (NRW) objectives:
 - minimise the likelihood of a fire happening
 - aim for a fire to be extinguished within 4 hours
 - minimise the spread of fire within the site and to neighbouring sites

Please note that the 3 above documents should be read in conjunction with the procedures and controlled document list held within the environmental management system.

1.1 - Overview of the Site

The site is located on an existing industrial area located at Neath Abbey Wharf, Skewen, Neath, Castell-nedd Port Talbot, SA10 6BL. The site is located with easy access to the M4 and A465 road networks. The Neath Abbey Wharf area has a network of waste recycling facilities including Sims Metal and Derwen Group.



Please see Site Location Plan (drawing no 02).

1.2 – Drawings

Copies of the drawings for the site are displayed in the weighbridge office. All new staff are shown the site drawings to make them familiar with the site.

The drawings for the site are:

| Drawing Title | Drawing Number | Relevant to Neath |
|--|----------------|----------------------|
| Site Planning Permission Boundary Plan | 01 | N/A |
| Site Location Plan | 02 | Yes |
| Site Ownership Boundary Plan | 03 | N/A as rented land |
| Environmental Permit Boundary | 04 | Yes |
| Fire Hydrant Locations | 05 | N/A as not available |
| Fire Protection Plan | 06 | Yes |
| Site Infrastructure Plan | 07 | Yes |
| Material Storage Plan | 08 | Yes |
| Site Drainage Plan | 09 | Yes |
| Receptor Plan 1km | 10 | Yes |
| Odour Plan | 11 | N/A |
| Habitat Plan | 12 | Yes |

2 – MANAGEMENT

2.1 General management

The licence requires the site to have cover by competent staff. To satisfy this Morris & Co have:

- Experienced directors and staff with years of waste management experience
- WAMITAB qualified staff – Richard Muir level 4 Haz Waste - 25% time cover required
- Induction and Training programme (see training matrix)

All documents, procedures and records within the company's Environmental Management System is held on the Compliance Drive and is readily available to staff.

2.2 Staff training and awareness

Training of new and existing employees is undertaken as per the Training Procedure (ProTrain) and is the responsibility of the Site Manager or Finance Officer dependent on role.

All new employees are inducted. There is an induction program which includes (but not limited too):

- Company awareness including no smoking policy
- Health and Safety
- Environmental permit awareness
- Emergency evacuation procedure

Following induction the employee is added to the company Training Matrix, where key training requirements are added dependent on role. The Training Matrix provides the full list of training available, trained, in progress or requiring training, all staff should make themselves familiar with this document, it is a live document and updated on an ongoing basis. The Training Matrix includes details of internal training, external training, SSOW¹/RA²/COSHH training one to one mentoring, toolbox talks or practice drills completed.

An illustration of the Training Matrix is below, further training is carried out than listed below, this is just an illustration. Also the names of the site staff are completed in the live document and a copy of the Training Matrix for the Neath site is readily available on the Compliance Drive.

Illustration only – Training Matrix:

| STAFF TRAINING MATRIX | | | | | | | | | | | | | | | | | | | | |
|-----------------------|-------|-------------------|-----------------|-------------------|--|---|---------------------------------------|----------------------|----------------------|-----------------------------------|-----------------------------------|----------------|-----------------------|--------------------------------------|---|------------------------------------|---|--|------------------|---------------------|
| Name | Skill | Induction Inc H&S | Manual Handling | EA Technical Comp | Wamitab Continuing Competence Certificate Transfer/Treatment of HW | Load Acceptance and Rejection Procedure | Waste Receipt, Separation and Storage | Env Permit Awareness | Fire Prevention Plan | Fire Marshal & Extinguisher Users | Evacuation and emergency response | Spill Response | Noise Management Plan | Daily Checks and Maintenance - Baler | Daily Checks and Maintenance - shredder | Daily Checks and maintenance - 360 | Daily Checks and Maintenance - Wheeled Loading Shovel | Daily Checks and maintenance - Counter Balance Forktruck | Plant re-fueling | Loading / Unloading |
| Site Manager | | | | | | | | | | | | | | | | | | | | |
| Site Supervisor | | | | | | | | | | | | | | | | | | | | |
| Operator 1 | | | | | | | | | | | | | | | | | | | | |
| Operator 2 | | | | | | | | | | | | | | | | | | | | |
| Operator 3 | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | |
| Trained | | | | | | | | | | | | | | | | | | | | |
| Training in Progress | | | | | | | | | | | | | | | | | | | | |
| Able to Train Others | | | | | | | | | | | | | | | | | | | | |
| Training Required | | | | | | | | | | | | | | | | | | | | |

Visitors are supervised whilst on site. At the visitors sign in area, there is an instruction sheet to the site that makes them aware of the correct safety and fire prevention procedures whilst on site.

¹ Safe System of Work

² Risk Assessment

2.3 Maintenance

The site has a preventative maintenance programme which includes:

- Daily check of all machinery and plant before work commences with sign off sheet
- In-house service and inspection completed every 4 months
- Annual inspections completed by 3rd party contracted company with full maintenance report

The Preventative Maintenance Procedure (ProMaintenance) should be followed at all times and all required paperwork completed and filed as either hard copy or a scanned copy record on the Compliance Drive (as per the Document and Record Control Procedure).

Preventative Maintenance Procedure – ProMaintenanceV1

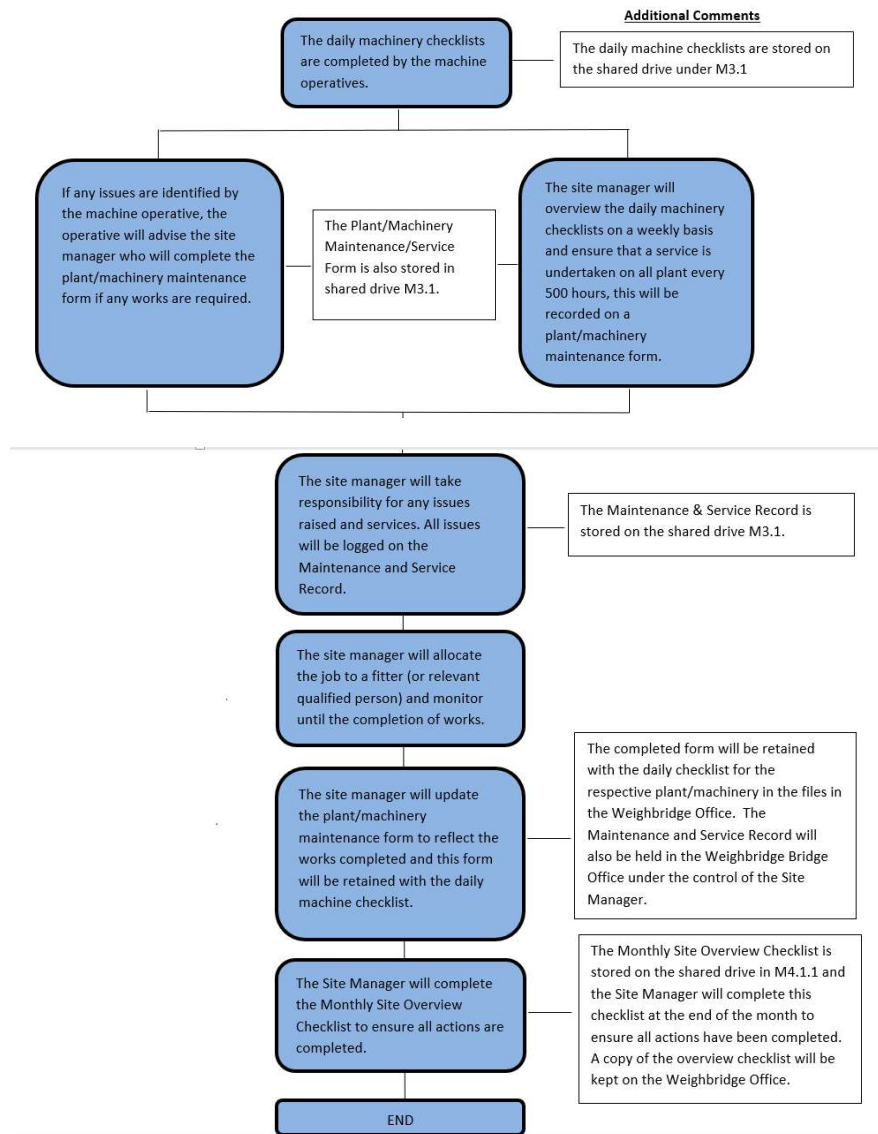


Plant Maintenance Procedure



| No. | Procedure |
|-----|---|
| 1.1 | <p><u>Definition</u></p> <p>The operations performed by Morris & Co (Handlers) Ltd require the company to have a structure in place for housekeeping in relation to the site, plant and equipment.</p> |
| 1.2 | <p><u>Responsibilities</u></p> <p>The scope of this procedure applies to all staff. The company adopt two levels of control in respect of Plant Maintenance. The Site Manager is responsible for the completion of the weekly Environmental Site Checklist and the Machine Operatives will complete the various daily Plant/Machinery Checklists. The Site Manager will then complete a monthly overview checklist to confirm all actions have been carried out.</p> |
| 1.3 | <p><u>Procedure</u></p> <p>Refer to the flowchart below (Figure 1.5).</p> |
| 1.4 | <p><u>Review</u></p> <p>This procedure will be reviewed at Management Review Meetings and only amended if required.</p> |

Plant Maintenance Procedure (Figure 1.5)



3 – OPERATIONS

3.1 – Overview of the Operation

The site receives incinerator scrap, steel UBCs and aluminium UBCs.

The incinerator scrap goes through a treatment shredding operation to separate and extract different metal grades to increase the recycling rate. The steel and aluminium UBCs are baled for onward sale.

Operational hours

| Day | Staff on site | Operational hours | Weighbridge hours |
|-----------|---------------------------------|-------------------|-------------------|
| Mon – Fri | 6.30 – 18.00 | 7.00 - 17.00 | 7.00 – 16.30 |
| Sat | 6.30 – 13.00 | 7.00 - 12.00 | Closed |
| Sun / BH | Maintenance only as required | Closed | Closed |

3.2 Permitted activities

Waste management operations shall be undertaken in accordance with the Environmental Permit and Environmental Management Systems.

Environmental Permit – EPR/ (TBC)

A copy of the environmental permit is available in the site office and all staff should be familiar with it. The key points of the environmental permit and operation include:

- To permit the operation of a Metal Recycling Site
- To permit the acceptance of 150,000 tonnes per year.
- Metal recyclables will predominately be received loose on articulated or bulk carrier vehicles. Loose material, once checked and accepted upon delivery, will be stored inside the building.
- Material following treatment will be stored either in the building or on the outside yard area in dedicated sealed bays.
- Treatment of metal waste including sorting, separation, grading, baling, shearing, compacting, shredding (less than 75t/hour), crushing or cutting of waste into different components for recovery.
- Clean surface water from roofs, or from areas of the site where the water can not run off stored waste or from areas not connected with treating waste, will be discharged directly to groundwater by seepage through the soil via a lagoon and soakaway.
- All material is removed from site within 3 months (see Fire Prevention & Mitigation Plan for further details on material storage and rotation).

3.3 The site boundary

The activities on site shall not extend beyond the site boundary.

Boundaries are made up as follows:

- East - 3m high palisade security fencing on the top of 4m high earth bank, backs onto river.
- South - 3m high palisade security fencing on the top of 4m high earth bank, backs onto marsh land.
- West - 3m high palisade security fencing and steel clad building.
- North – mixture 3m high palisade security fencing and concrete block panels topped with barbed wire, backs onto Sims Yard.

The proposed site environmental permit boundary is shown on drawing 04.

3.4 Waste acceptance/rejection

Procedure ProLoadAcc/Rej details the company's procedure for accepting waste materials on site and when material should be rejected. Only permitted wastes as specified by the environmental permit will be accepted on site. All waste received is inspected upon delivery to ensure it conforms to type and quality purchased. Any waste which does not conform to the environmental permit or does not meet the specification of the material purchased will be rejected from site.

3.5 Site security

CCTV - The site has CCTV which records 24/7. Multiple camera images from the CCTV are displayed in the office and the images are recorded to a hard drive in the office.

The CCTV on site is owned by the landlord and monitored by ADT. CCTV is situated on external areas on the site and is used to monitor both H&S and security aspects. When the cameras are being monitored at night, the cameras are triggered on movement and the monitoring company call persons via mobiles as per their response list. The monitoring company is also required to view the whole site at least every 30 minutes out of hours and to raise any concern i.e steam or change in conditions in the building. The monitoring company are required to call persons on their response list or to call the Fire and Rescue Service as necessary.

This is checked daily as part of our environmental monitoring regime and recorded on the Environmental Site Checksheet.

Arson – the gate at the side of the building is locked out of hours.

All reasonable precautions are taken to prevent unauthorised access to the site. Condition of fencing, gates and security are performed daily and recorded on the Env Site Checklist. If fences and gates are damaged and their integrity is impaired, they shall be repaired within 7 working days. Where it is not possible to make proper repairs within the working day, temporary measures are implemented.

3.6 Site notice board

The site notice board is located at the site entrance and includes the following information:

- the permit holder's name (Morris & Co (Handlers) Ltd)
- an emergency contact name and telephone number
- a statement that the site is permitted by National Resources Wales
- the permit number
- National Resources Wales telephone number 0300 065 3000 (press 1 for the 24 hours incident hotline)

The boards are checked weekly and recorded on the Env Site Checklist.

3.7 Access to Permit

A copy of the permit is available either in the office or displayed on the notice board in the canteen.

4 – DRAINAGE

Please see Drainage Plan Drawing No.09 for an illustration of the drainage system on site.

Below is a summary of the site drainage and infrastructure:

Office – WC

- Foul connection to septic tank

Building

Drainage

- There are no internal drains in the building
- 1m dwarf wall around the entire internal wall line for containment as necessary
- 150mm depth sleeping policeman at roller shutter door entrances
- North top left corner of building is lower than the floor of the building to provide extra containment around baler equipment
- Roof water runs off existing gutters and drainpipes down the side of the building which connects to the existing groundwater/seepage system and lagoon

Infrastructure

- Fully impermeable pavement internally

External – Waste Storage Area

Drainage

- Pre-cast concrete wall around storage area, sealed to provide containment
- Pre-cast concrete wall extended into yard area to provide additional containment

- 2 x 150mm depth sleeping policeman, one parallel with the equipment and one at right angles with the end of the wall
- There is a drain at the top right hand corner of the sealed area where the equipment comes outside, this is connected to an over flow tank which is located at the side of the building. Water captured in the over flow tank could either be used in the building for dust suppression or tankered away from site. Water held within the over flow tank during a fire could also be used to recirculate on the fire if necessary.
- The extended length of the wall allows for spill management and a secondary containment system for water that may escape the sealed material storage area
- The material stored would soak up some water held in the area as it is an ash.

Infrastructure

- Fully impermeable pavement

External – Non-Waste Storage Area

Drainage

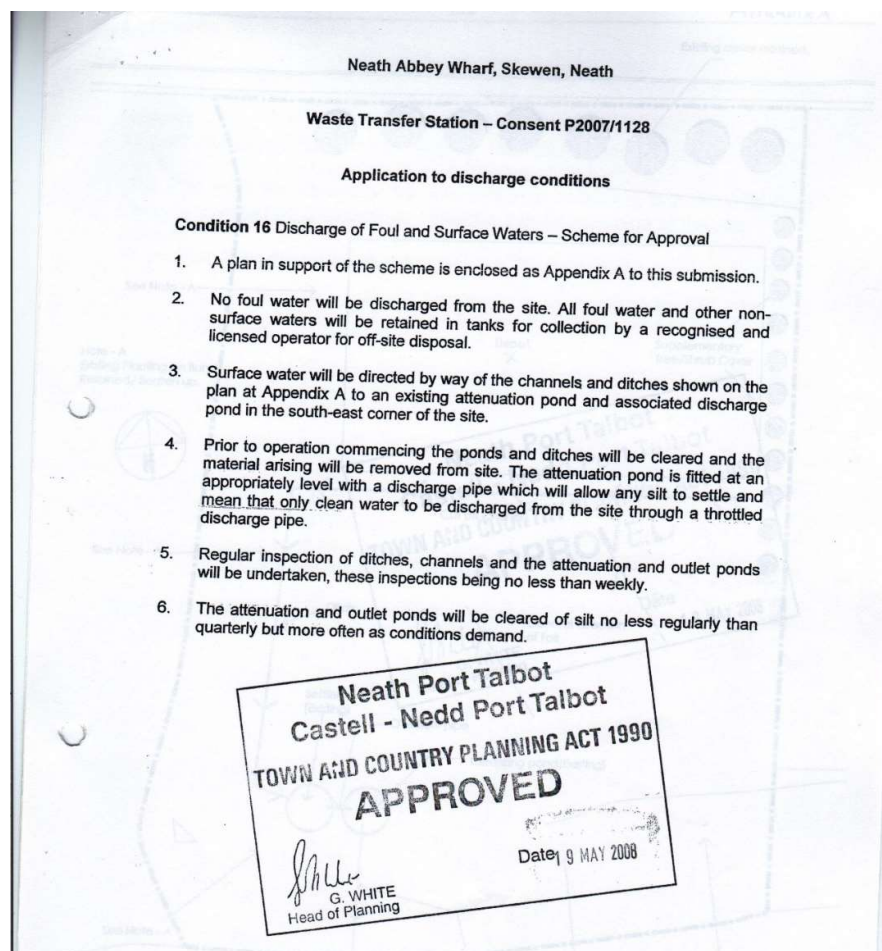
- Surface water run off to groundwater/seepage via the lagoon

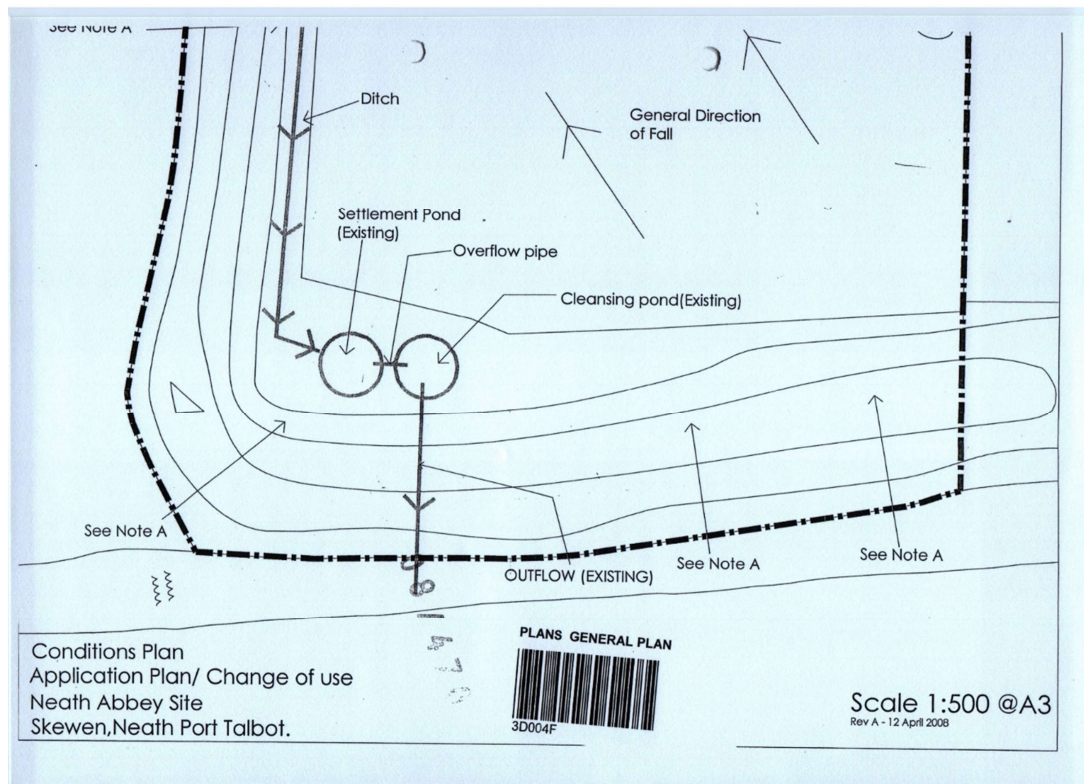
Infrastructure

- Impermeable pavement where vehicles enter the site and front of the building
- Gravel beyond the pre-cast concrete wall
- Rough asphalt to the permitted boundary

Lagoon

- The scheme to install the lagoon was approved by Neath Port Talbot Council on 19th May 2008. Planning consent P2007/1128. Details of the planning consent are below.





5 - EMISSIONS AND MONITORING

5.1 Fugitive emissions of substances

The following measures are in place to ensure the site operates to prevent and minimise any potentially polluting emissions:

- The majority of the waste received arrives from another waste facility and therefore weighbridge tickets with waste descriptions arrive with the waste. All paperwork for waste entering the site is checked before unloaded from the vehicle.
- The outside waste storage and treatment area is a fully impermeable pavement and sealed area. The nature of the material ensures that the area will remain free of standing water during normal weather events.
- The pitch on covered buildings ensures that rainwater is collected by guttering and drain pipes and fed to the existing groundwater drainage.

5.2 Storage areas of liquids

The site holds:

- 1 x 1000ltr IBC of used oil, stored in the bunded building around the baler area
- 1 x 1000ltr IBC of new oil for baler, stored in the bunded building
- 1 x 1000ltr IBC of new oil for machines, stored in the maintenance area.
- 4000ltrs of diesel for machines, 2000 in a steel tank and 2000 in IBCs, all stored in the bunded building
- All chemicals on site are stored in the locked CHEM store which is located in a storage container on site. In the event of a spillage inside the container, spill dry granules would be used to contain the spill.

All oil and diesel is kept within the building which is sealed with no internal drainage, please see Site Infrastructure Plan drawing No.7.

In the event of a spillage on site either inside buildings or on the outside storage areas, pallets of spill dry are available. The spill dry is used to contain any oil or contaminated waters. The contaminated granules are put in the allocated steel drum spill bin and disposed of to a hazardous waste disposal.

5.3 Inspection and maintenance of engineered containment

All areas are inspected at least monthly to ensure the continuing integrity and fitness for purpose of their construction. The inspections are reported on the Env Site Checklist. If any damage is detected which breaches the integrity of the engineered containment so that it no longer meets the specified standard, the issue will be brought to management attention and an action implemented to correct the issue.

5.4 Odour

If complaints were received regarding odour, the Complaint Form would be completed together with a record of the prevailing weather conditions (especially wind direction and speed) at the time. The complaint would be investigated, recorded and conclusions acted upon.

If odour complaints persisted, the company would implement an Odour Management Plan.

5.5 Noise and vibration

Details on how the company monitor and manage noise on site can be found in the Noise Management Plan (see separate document).

As site operations are performed inside the building, noise is considered a low impact. Residential development is more than 50m away and the neighbouring industrial businesses are waste facilities and heavy industrial and therefore the background noise of the industrial estate is elevated. All on site mobile plant and machinery complies with current legislative requirements.

If complaints were received regarding noise the Noise Complaint Form together with a record of any likely causes noted at the time should be completed. The complaint shall be investigated and a concluding record made.

Example Noise Complaint Form:



Noise Complaint Form

| | |
|---|----------------------------------|
| Complaint No: | |
| Time and date of complaint: | Name and address of complainant: |
| | Telephone number of complainant: |
| | Email of complainant: |
| Location of caller in relation to the site? | |
| Date of noise event: | |
| Time of noise event: | |
| Duration of offending noise: | |
| Weather conditions at the time of offending noise (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 (eg from NE): | |
| Complainant's description of noise: | |
| o What kind of noise is it? | |
| o Duration of the offending noise (time): | |
| o Is it a constant or intermittent noise in this period: | |
| o Does the complainant have any other comments about the noise? | |
| Are there any other complaints relating to this noise? (either previously or relating to the same exposure): | |
| Operating conditions at the time of the offending noise and any deviations from standard practices at the time: | |
| Do you accept that the noise is likely to be from your activities? | |
| What was happening on site at the time the noise occurred? | |
| Follow up, time and date caller contacted: | |
| Actions taken: | |
| Is an amendment to the Noise Mgt Plan required? | |
| Form completed by: | Date: Signed: |

Noise Complaint Form

Version 1

5.6 Flies

If complaints were received regarding flies, the Complaint Form would be completed. The complaint would be investigated, recorded and conclusions acted upon.

If fly complaints persisted, the company would implement an Fly Management Plan.

5.7 Pests, scavenging animals and birds

Pest control is completed via bait boxes across the site which are baited and inspected monthly. A record of the check is made on the Environmental checklist.

5.8 Control of mud and debris and loose waste

Vehicles do not come into contact with mud and therefore no mud would be carried onto the highway. There is also a long access route from the site to the highway and therefore any potential risk is minimised.

The majority of the material is delivered and collected in articulated and therefore waste is extremely unlikely to escape from the vehicle.

5.9 Control of litter

Regular litter picks are employed and a dedicated member of staff is allocated to recover any litter that may escape from the site. The level of litter and completion of litter picks are monitored daily and recorded on the Env Site Checklist.

5.10 Control, monitoring and reporting of dust, fibres and particulates

The incinerator waste received on site, can increase the level of dust particularly in dry weathers. Dust levels are reviewed and monitored daily on the Env Site Checklist. If the dust levels increase in the building, the incinerator waste watered down via mains supplied sprinklers and hoses when required. Any water used is soaked up in the waste.

The yard is swept regularly and if necessary mains water could be sprayed on the external yard surface.

6 - INFORMATION

6.1 Complaints

The complaint procedure should be followed at all times:

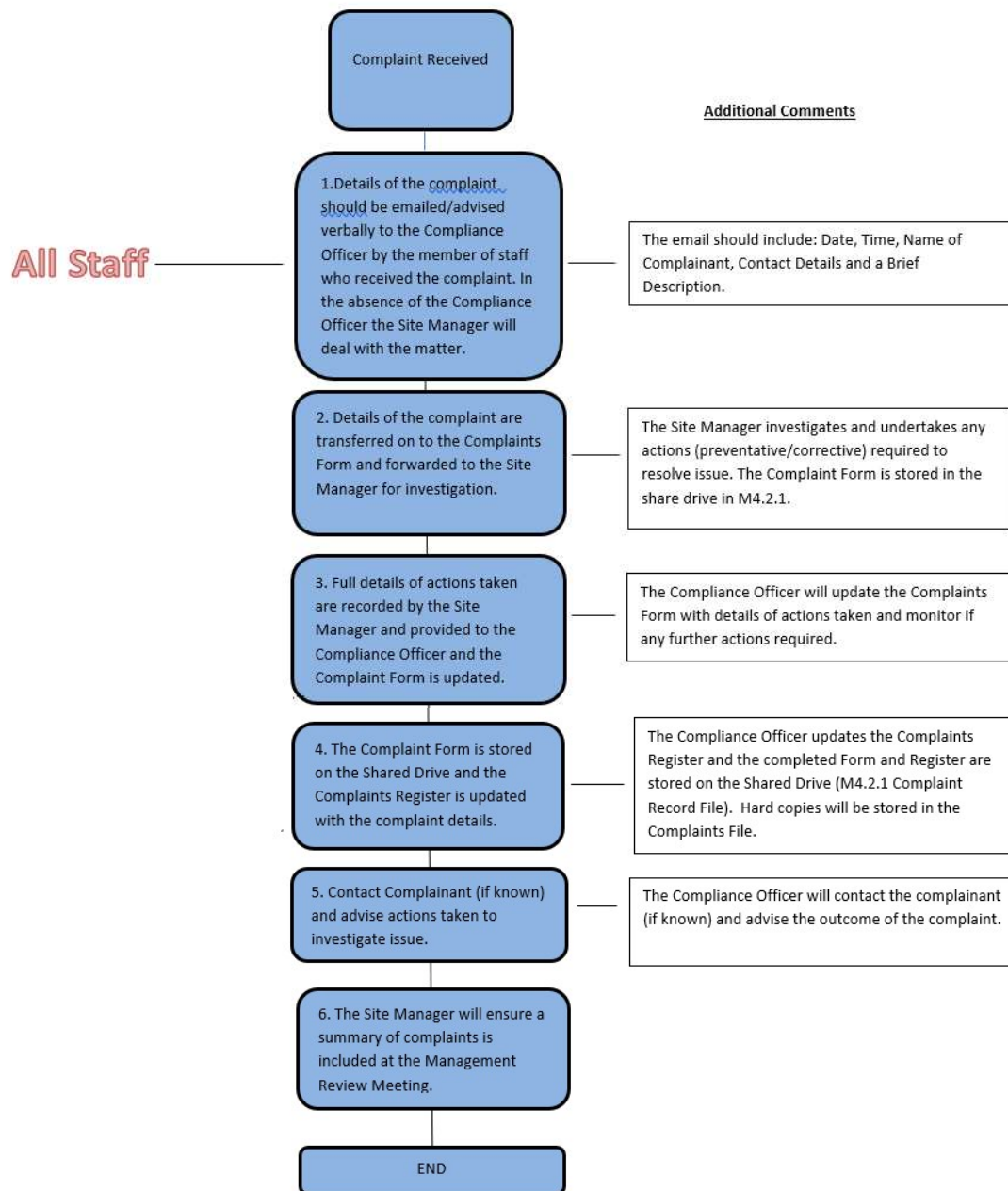


Complaints Procedure

| No. | Procedure |
|-----|--|
| 1.1 | Definition The operations performed by Morris & Co (Handlers) Ltd means that the company is monitored under the Environmental Permitting Regulations. A Permit requires that a complaints procedure is implemented and that all complaints are dealt with effectively and quickly. |
| 1.2 | Responsibilities The scope of this procedure applies to all staff, active customer accounts, regulatory bodies, 3 rd parties and neighbours. The Site Manager is responsible for the investigation of the complaint. In certain circumstances where the necessary action is of a strategic nature or may incur major changes to the organisation, temporary mitigating action may be taken to ensure immediate rectification, whilst a long-term solution is devised. It may also be that preventative action is appropriate. Whether the action taken is corrective or preventative the objective should be to avoid a recurrence of the situation that has led to the complaint. |
| 1.3 | Procedure <ul style="list-style-type: none"> A complaint is a statement that something is unsatisfactory or unacceptable. A complaint can be expressed verbally or in written form (email/letter). When a complaint has been received refer to the flowchart overleaf for guidance (figure 1.5) |
| 1.4 | Review This procedure will be reviewed at Management Review Meetings and only amended if required. |



Complaint Procedure (Figure 1.5)



Complaint Form

The Complaint Form (example below) can be found on the Compliance Drive. Completion of the complaint form should be made in compliance with the Complaints Procedure at all times.



Complaint Form

Complaint No:

| | |
|---|--|
| Who made the complaint: Name: | |
| Job Title: | |
| Address: | |
| ☎ Phone No: Mobile: Email: | |
| Member of staff who received complaint: | |
| Date & time of complaint: | |
| Weather conditions: | |
| Full Description: | |

| | |
|---|------------|
| Was anyone else aware of this: YES / NO | If so who? |
| What actions have been taken: | |
| Was there anything further to report i.e. damage, pollution: YES / NO If so, please provide details: | |
| Feedback given to complainant if known: | |
| Matter resolved: Yes / No <small>Continue overleaf or on a separate sheet if you do not have enough room</small> | |

Complaint Form

Version 1

6.2 Non-conformance procedure

The non-conformance procedure is used to record near miss accident or incidents on site, failure of the EMS system or breaches in site operating procedures. The non-conformance procedure should be followed at all times:

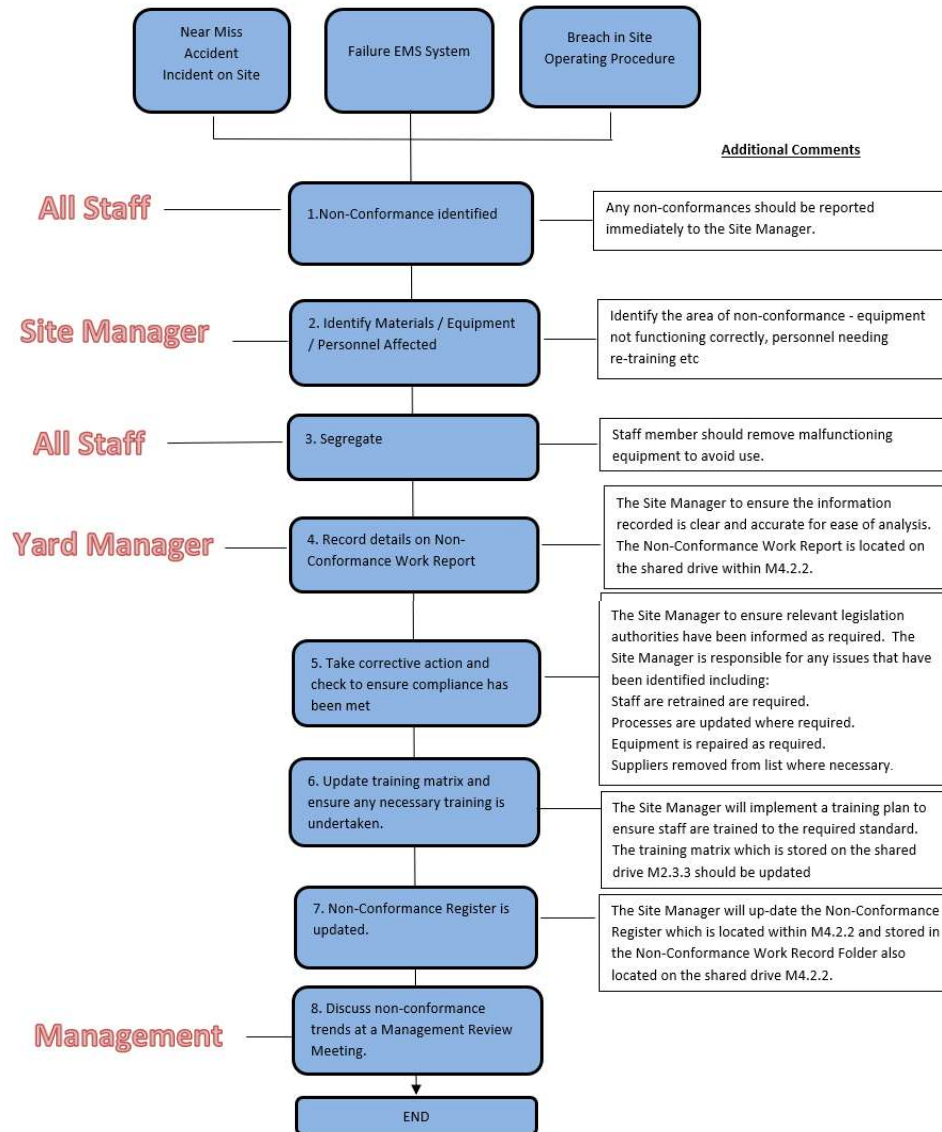


Non-Conformance Procedure

| No. | Procedure |
|-----|--|
| 1.1 | Definition <p>The operations performed by Morris & Co (Handlers) Ltd means that the company is monitored under the Environmental Permitting Regulations. A Permit requires that a non-conformance procedure is implemented and that all non-conformances are dealt with effectively and quickly.</p> |
| 1.2 | Responsibilities <p>The scope of this procedure applies to Management.</p> <p>The Site Manager is responsible for the investigation of any non-conformance that relates to the Site. In certain circumstances where the necessary action is of a strategic nature or may incur major changes to the organisation, temporary mitigating action may be taken to ensure immediate rectification, whilst a long-term solution is devised. It may also be that preventative action is appropriate. Whether the action taken is corrective or preventative the objective should be to avoid a recurrence of the situation that has led to the non-conformance.</p> |
| 1.3 | Procedure <p>When a non-conformance has been identified, refer to the procedure below (Figure 1.5)</p> |
| 1.4 | Review <p>This procedure will be reviewed at Management Review Meetings and only amended if required.</p> |



Non-Conformance Procedure (Figure 1.5)



The Non-Conformance Form can be found on the Compliance Drive. Completion of the non-conformance form should be made in compliance with the Non-Conformance Procedure at all times.

6.3 Records (Waste Receipt/Dispatch)

All records required relating to the receipt and dispatch of waste are legible, made as soon as reasonably practicable by the site and are retained for a minimum of 6 years. Events affecting the environment shall be kept until any permit approved is surrendered.

All waste entering the site is weighed and a weighbridge ticket is printed, this includes the following information:

- Time and date received
- Vehicle registration and waste carrier details
- Producers name and address
- Description of the waste by EWC category and quantity in tonnes

All waste leaving the site is weighed and a weighbridge ticket is printed, this includes the following information:

- Time and date removed
- Vehicle registration and waste carrier details
- Name of company accepting waste and the carrier
- Description of the waste by EWC category and quantity in tonnes
- Recycling facility accepting the waste

The weighbridge is inspected at least annually and a Certificate of Verification is issued. A contractor is employed to maintain the computer software. The weighbridge is maintained on a regular schedule.

6.4 Reporting

Quarterly Returns

The environmental permit requires quarterly reporting to National Resources Wales. A daily record of waste types and quantities received and removed from the site is maintained and is provided to NRW quarterly and in the format requested.

Notifications to National Resources Wales

Within 24 hours of any of the following incidents, Morris & Co must notify National Resources Wales:

- 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
- For any breach of a limit
- For the detection of any significant adverse environmental effect