

**Report 3
Summary
Environmental
Management System**

**SSQ MATERIALS
RECYCLING FACILITY
LLANWERN**

Report Number 2473r3v1d1224

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1 INTRODUCTION

An Environmental Management System (EMS) is a structured system which, once implemented, helps an organisation to identify the environmental impacts resulting from its business activities. It also helps manage and reduce those impacts, so that the environmental performance of the organisation is improved. An EMS should provide a methodical approach to planning, implementing and reviewing an organisation's environmental management.

Under the Environmental Permitting Regulations, DLS is required to have an appropriate EMS in place while it is holding a Permit. The EMS must set out in detail, how all the activities relating to the Permit, and specifically waste management and pollution control will be managed.

At this stage of the application process, NRW requires a summary of the management system to be in place when the site is operational. By the time the Permit is issued, NRW will expect DLS to have the management systems in place as it will be part of the first NRW site inspection.

Central to the EMS will be a set of Procedures and Standard Forms which will need to be implemented when the site is operational. In this summary EMS, the range of procedures that will be required are detailed and the type of forms that will be implemented provided. As DLS will process waste to produce aggregates in accordance with Quality Protocols, a Factory Production Control system will also be in place when the site is operational.

1.1 Objectives

DLS already successfully operates an integrated management system produced to achieve the benefits from management system standards ISO 9001:2008 and ISO 14001:2004.

The EMS that will ultimately be in place will be aligned with these standards. This site specific EMS does not attempt to duplicate the procedures already documented in the integrated company EMS and which will also ultimately apply at the site. Rather, this summary EMS outlines the measures that will be adopted to ensure that the management of the waste is being controlled and risks to the environment managed.

2 THE SITE SETTING

2.1 History

The different areas forming part of the wider land ownership of Tata to the south of Queensway are identified on Figure 2-1.

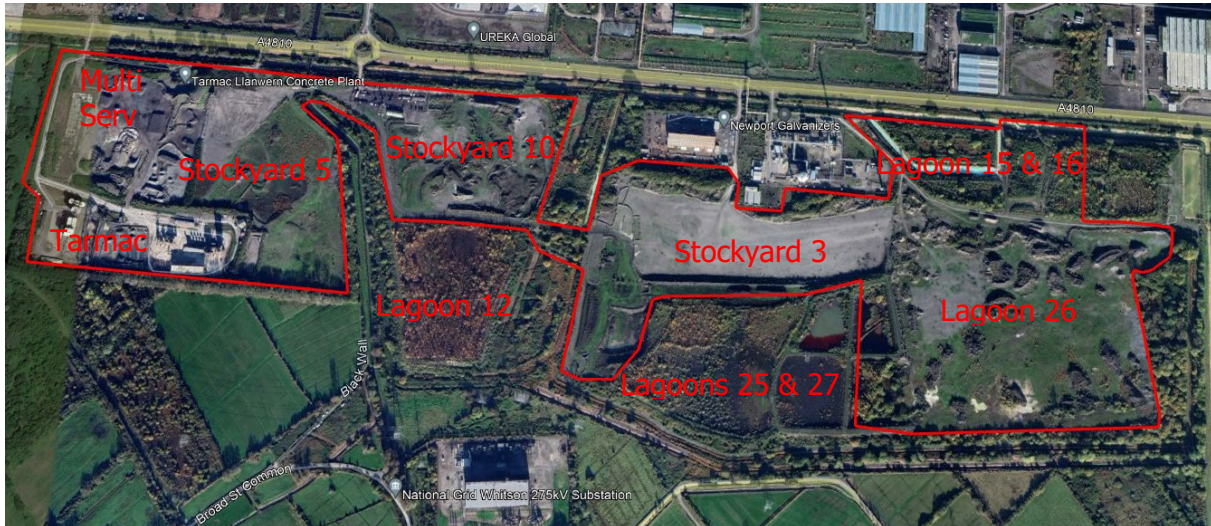


Figure 2-1 Annotated Site Plan

Prior to placement of a slag aggregate hardstanding, the ground surface comprised poorly drained pasture land dissected by a number of shallow ditches which were part of the reën system of the Gwent levels. Utilisation of the area was initially confined to the western part and the gases manufacturing plant (the current Wedge Group Galvanising Plant). However, the utilisation expanded over the years and saw the construction of a bunded landfill for ferruginous sludges created in 1979 at Lagoon 12 and then expansion on the east.

The area to the south of Queensway was historically the waste processing and waste disposal area for the works. In addition, the site provided a safe and level area for some of the essential ancillary services which supported the steelworks operations. These included the gases manufacturing plant (formerly BOC but now Air Products), the heavy vehicle maintenance garage, a concrete and asphalt plant (which used slag aggregates in the manufacturing) and a cement and concrete plant (also used slag in the manufacturing process). In 2004, part of the BOC works was converted to become a commercial galvanising plant which also provides services to the works.

2.2 Current Topography

The current topography of each area is characterised by wide open spaces of level ground that is covered with numerous stockpile of various size and orientation.

2.3 Ground Conditions

The ground conditions across the whole of SSQ and the three processing areas is consistent and very well understood. In summary, the following sequence of strata is consistently present:

<u>Strata</u>	<u>Thickness(m)</u>
Infilled Ground – Slag	0.30 – 3.00
Estuarine Alluvium – Upper Marine Clay	3.10 – 7.00
Estuarine Alluvium – Peat	1.00 – 2.00
Estuarine Alluvium – Lower Marine Clay	1.00 – 4.10
Triassic Bedrock	>5.20

A Holocene sequence of low permeability clays and peat overlie bedrock at the site. This sequence of clays and peats are typically 10 to 15 meters thick across the Gwent levels and were formed within the last 10,000 years or so. At the site, these sediments have been found to be locally up to 17 meters thick and to comprise an upper and lower clay layer separated by a peat horizon.

2.4 Current Land Quality

The land quality in each area has been investigated. The full results of these investigations are presented in the Site Condition Report that will be maintained during the lifetime of the Permit and used to inform Surrender. Analysis of site materials has shown that it is suitable for a commercial land use.

2.5 Hydrogeology

The strata below and near the site is considered by NRW as a non-aquifer. Both the Holocene sediments and the underlying Mercia Mudstone are of low to extremely low permeability, which supports their classification of the area as a Non-Aquifer. There is no known licensed or unlicensed groundwater abstraction from strata underlying the Caldicot Levels.

The absence of any groundwater abstractions from this hydrogeological setting, in an area where mains supply requires significant investment in infrastructure, supports the assertion that groundwater is not a viable resource in this low permeability setting. The site is located in an area of low groundwater vulnerability.

2.6 Hydrology

There are no surface water features in any of the areas to be Permitted.

There are two primary watercourses present in the area, the Hundred Perches Reen and Monks' Ditch. Both are classified as Main Rivers, which means that they fall under the responsibility of Natural Resources Wales (NRW). Smaller watercourses include Oxleaze Reen that is located directly north of the South Wales main railway line.

The Hundred Perches Reen flows from north to south along the far eastern boundary of the steelworks and into Middle Road Reen which discharges to the estuary by way of Elver Pill Reen and Windmill Reen. This reen is over 1km east of the site. The Monks' Ditch flows from north to south approximately 350m west of the Westland site, along the eastern edge of

Stockyard 5. Both watercourses ultimately discharge into the Severn Estuary, which lies approximately 4km to the south.

The network of ditches and reens immediately surrounding the site are shown on Figure 2-2. These form part of the Gwent Levels which comprises an extensive low-lying area of estuarine alluvium located on the north side of the Severn Estuary between Cardiff and the River Rhymney in the west and Chepstow on the River Wye in the east. The presence of these ditches reflects the very low permeability of the upper clay.

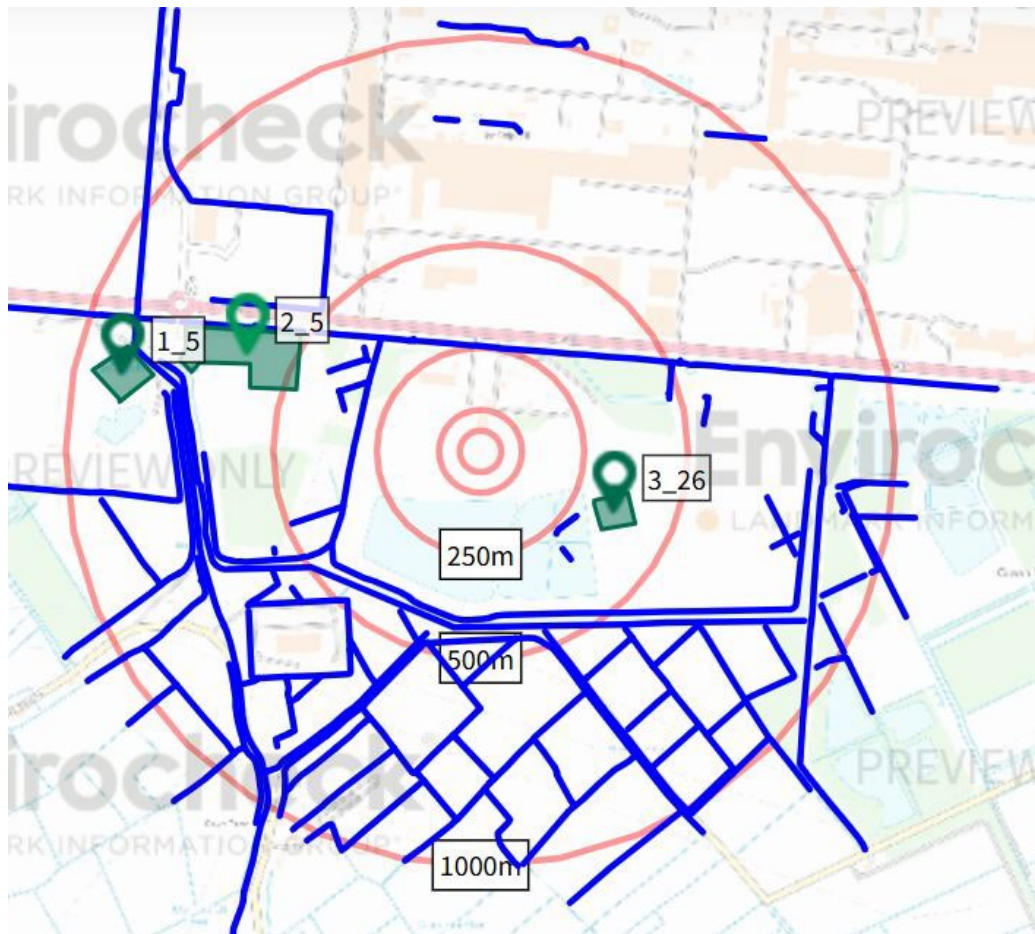


Figure 2-2 Surface water features around each site

Almost all the annual recharge falling on the SSQ site and surrounding Gwent Levels leaves via surface runoff due to the low permeability nature of upper clay soils and the underlying low permeability Holocene sediments.

On site, infiltration falling on the hardstanding to be used for storage and processing in each of the areas will ultimately be captured into the same network of ditches but will first infiltrate through the slag development platform and slowly migrate along the upper surface of the upper clay. Such seepage will eventually migrate to one of the surface water ditches excavated into the low permeability upper clay that encompass SSQ. These ditches are designed to capture and divert such drainage to the Tata surface water treatment area, preventing escape to the wider environment.

As all of the drainage ditches surrounding SSQ are incised into the underlying low permeability alluvial clays they provide a protective barrier against the migration of potential contaminants from SSQ to the sensitive Site of Special Scientific Interest (SSSI) features to the South. The whole system is managed under Tata's environmental permit with routine maintenance including dredging and vegetation clearance as shown in Plate 2-1.



Plate 2-1 Ongoing clearance of inner ditch south of Lagoon 25 (12 November 2024)

2.7 Flood Potential

According to the mapping provided in the Envirocheck report parts of the site appear to be at risk of flooding.

2.8 Pollution Incidents

According to the Envirocheck report there are no recorded pollution incidents to surface water at the site or in the surrounding area.

2.9 Ground Instability

The placement of the slag aggregate hardstanding has allowed the site to be used for commercial purposes for several decades and no natural ground is currently present at ground surface within the site.

2.10 Environmental Sensitivity

The SSQ and the three sites lie adjacent to the Whitson Site of Special Scientific Interest (SSSI) and Nash And Goldcliff SSSI, notified in 1988 and 1987 respectively. These two SSSI's form part of a series between Chepstow and Cardiff, the whole area being referred to as the Gwent Levels. These two SSSI's were designated because they form part of an extensive reën system now rare within Wales which supports a rich assemblage of plants and animals. This is principally due to the variety of reën types and differing management regimes. The position of the SSSI relative to the three area is shown in Figure 2-3.

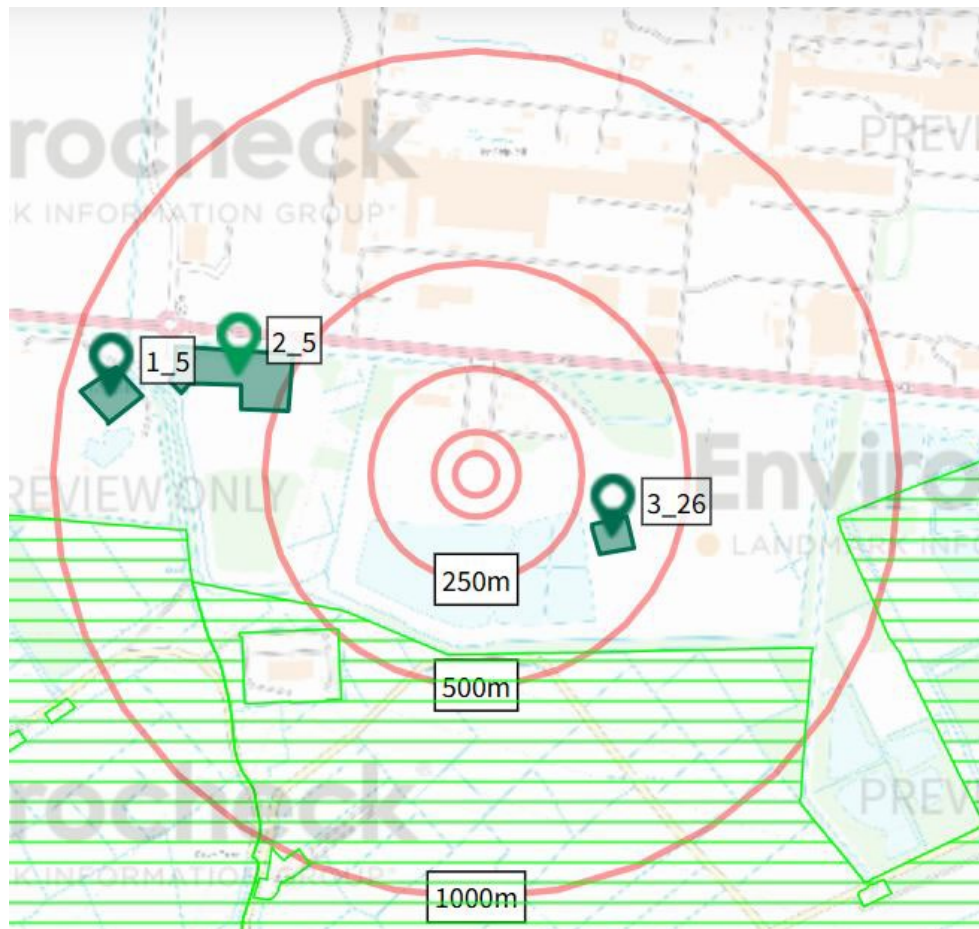


Figure 2-3 Position of SSSI (horizontal green line) relative to processing areas

The importance of these SSSI is enhanced by their proximity to the Severn Estuary which is also a protected area.

According to the Envirocheck report there are no other designated sites in proximity to the site. However, a Site of Importance for Nature Conservation (SINC), known as Spencer Works 3, was previously identified in the southeastern corner of SSQ. At this stage, it appears that this site is no longer designated as a SINC as it is not listed on the Newport Council website. As this area is no longer marshy grassland this may have resulted in its removal from the list of SINC's. Such SINC designations do not prevent developments, where there are no adverse impacts on the features for which a site is designated and on wider ecosystem

resilience. Where harm is unavoidable it should be minimised by mitigation measures and offset as far as possible by compensation measures.

2.10.1 Ancient Woodland

There is no ancient woodland in close proximity to the site.

2.11 Residential Properties

As shown on Figure 2-4, the SSQ area is remote and not directly connected to any residential areas. The closest properties are located approximately 700m southwest.

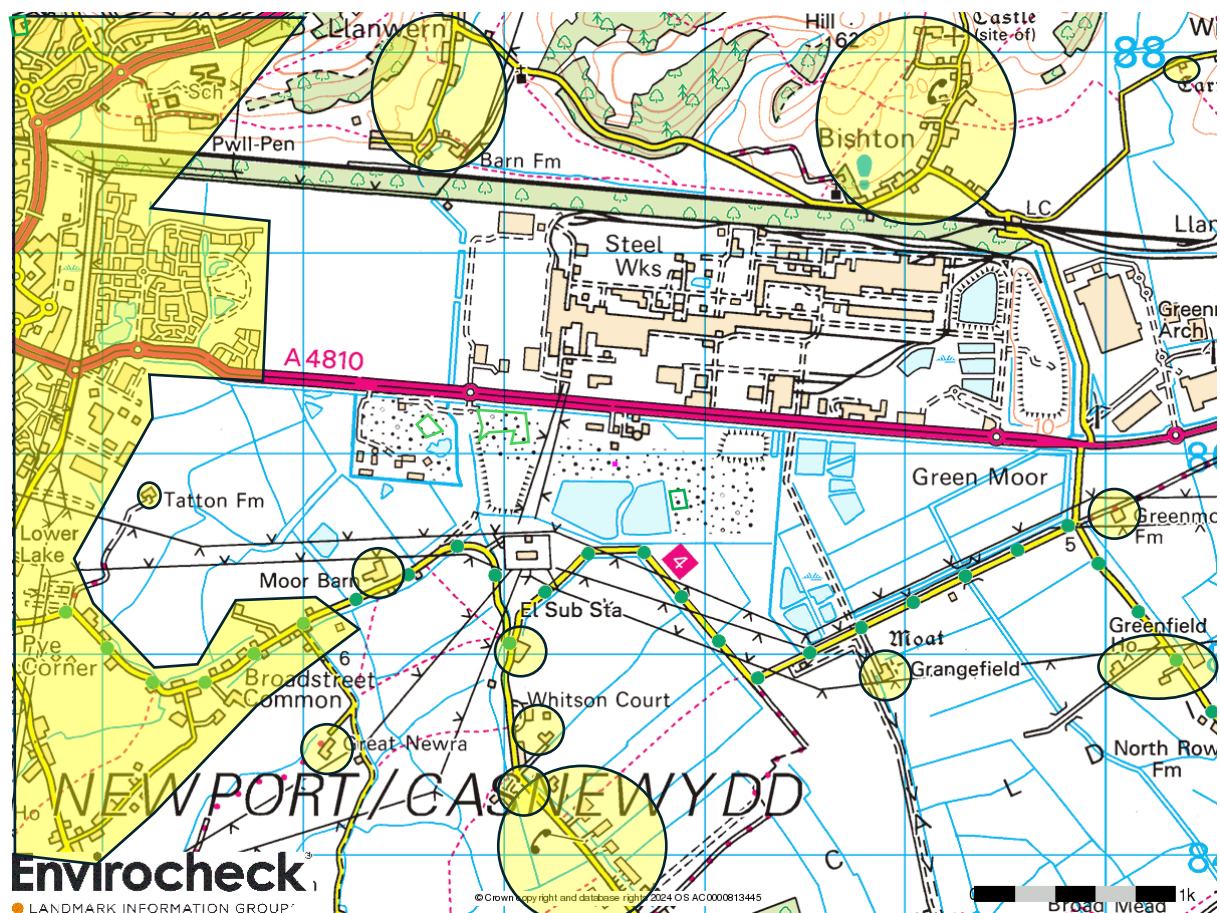


Figure 2-4 Residential properties in surrounding area

2.12 Waste Management

In the 1970's, Newport Borough Council issued a COPA licence for the disposal of waste materials from the steelworks within SSQ. The licence was never surrendered or rescinded and the licence transferred into the Waste Management regime (Licence 024/97). Various parts of the SSQ Waste Management site were subsequently taken into the IPPC permit for the steelworks, but this permit ceased with the cessation of steelmaking in 2002. Subsequently, Lagoon 27 was taken into the steelworks PPC Permit at the time (Permit BS3905). A Non-Hazardous landfill has also been permitted under the PPC regime within SSQ (PPC Permit GP 3331SV). This PPC landfill is referred to as South Side Queensway Non-Hazardous Landfill (SSQ NHL). This landfill has never entered its pre-operational phase.

Natural Resources Wales issued a Closure Notice (No. GR/EM4/01) for Llanwern Landfill, South Side Queensway (SSQ) which specified that the landfill must cease accepting waste for disposal as of 25 February 2008 and that it must be maintained, monitored and controlled as required by the conditions of the authorisation numbered 024/79. In response, Tata prepared a Closure Report and Aftercare Monitoring Plan that was accepted by NRW.

This means that none of the proposed treatment areas are covered by an operational Permit.

2.13 Other Regulated Activities

Alongside the regulation and permitting of landfills, there are many industrial activities in the area. These are related to the immediate activities to the north of SSQ and in the main steelworks. This includes the COMAH facilities at Air Products on the northern boundary of SSQ.

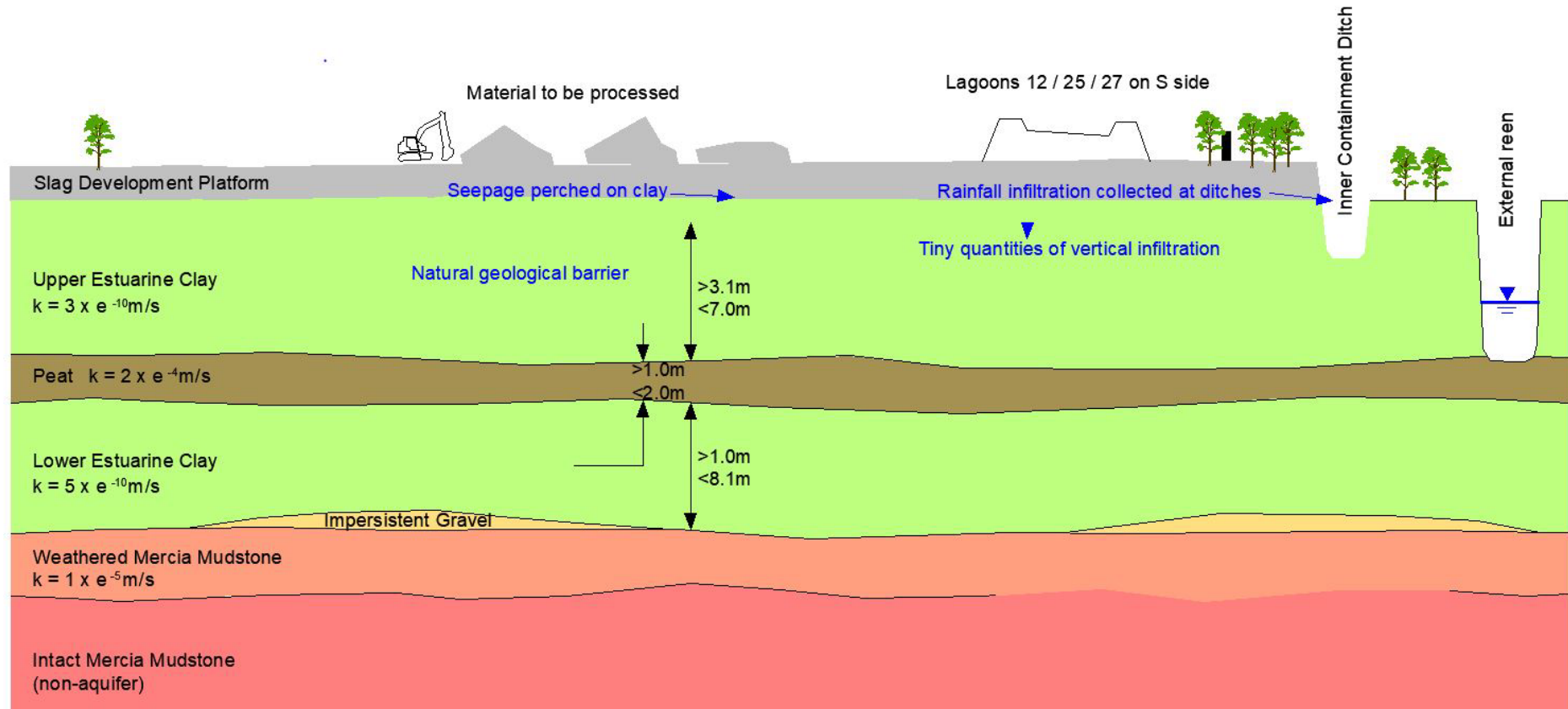
2.14 Potential off-site Contaminative Sources

To the immediate north of the site are several commercial and industrial operations. Beyond the A4810 are the remains of Llanwern steelworks that started operating in the 1960's. With the demise of the 'heavy end' in 2001, the site currently includes mills that roll, pickle and galvanise steel coil for a range of engineering applications. This operation is undertaken under a Permit regulated by Natural Resources Wales.

2.15 Conceptual Site Model

The current conceptual site model underpinning the risk assessment and therefore the management systems is diagrammatically illustrated in Figure 2-5.

Figure 2-5 Current Conceptual Site Model



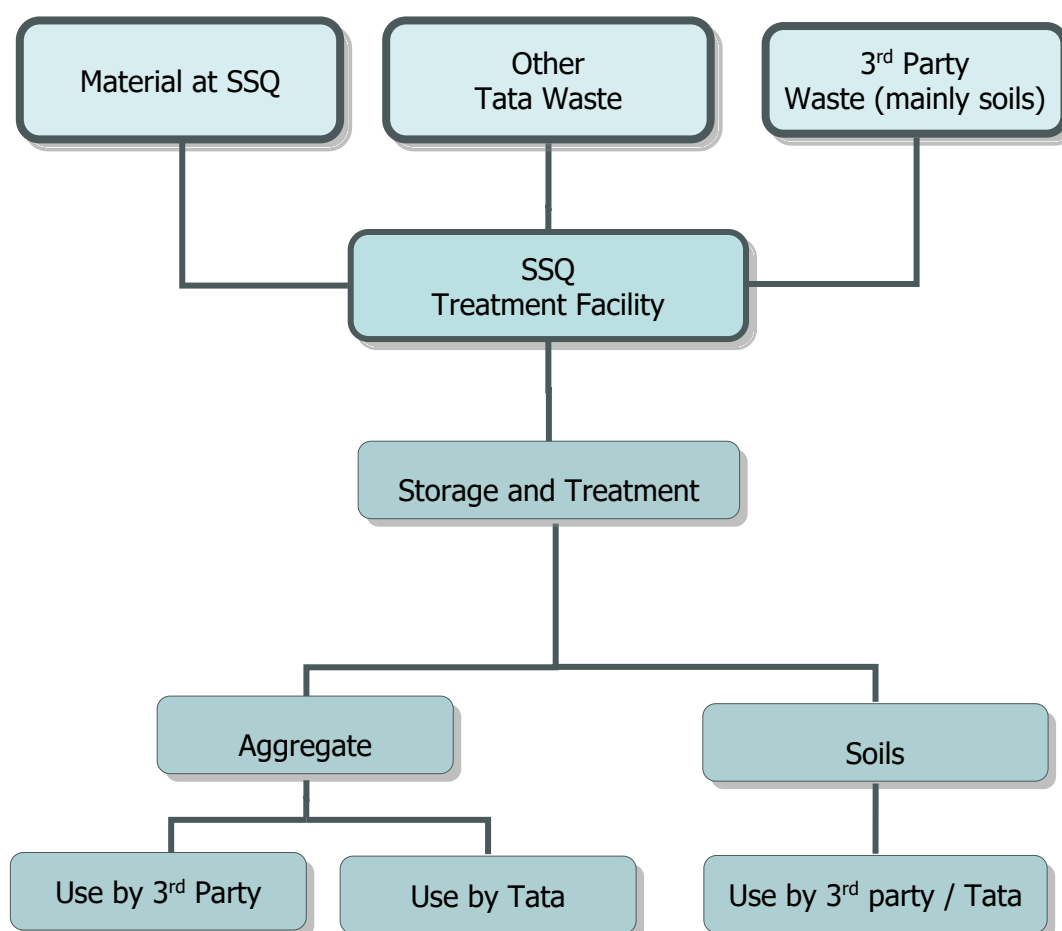
3 OVERVIEW OF WASTE OPERATIONS

3.1 Overview

DLS requires a Permit to allow the storage and processing of waste at three positions on the South Side of Queensway (SSQ), Llanwern. The recovered outputs from the facility will primarily include slag and construction based aggregate and soil.

A flowchart showing the overall process is provided in Flowchart 3-1.

Flowchart 3-1 Proposed Operation at SSQ



3.2 Acceptable Wastes

Table 3-1 summarises the list of wastes to be stored and processed.

Table 3-1 Wastes to be Accepted

EWC Code	Description of Wastes to be Accepted	EWC Entry Type
EXCLUSIONS Wastes having any of the following characteristics shall not be accepted: <ul style="list-style-type: none"> Consisting solely or mainly of dusts, powders or loose fibres Hazardous wastes Wastes in liquid form 		
01 04 08	Waste gravel and crushed rocks other than those mentioned in 01 04 07 may include excavation from mineral workings	MN
01 04 09	Waste sand only	AN
10 11 03	Waste glass-based fibrous materials allowed only if: Wastes without organic binders	AN
15 01 07	Glass packaging	AN
17 01 01	Concrete (excluding concrete slurry)	MN
17 01 02	Bricks	MN
17 01 03	Tiles and ceramics	MN
17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06	MN
17 02 02	Glass (Must not include fibreglass or glass fibre)	MN
17 03 02	Bituminous mixtures	MN
17 05 04	Soil and stones other than those mentioned in 17 05 03 Must not contain any contaminated soil or stone from contaminated sites.	MN
17 05 06	Dredging spoil other than those mentioned in 17 05 05 allowed only if: Inert aggregate from dredgings. Must not contain contaminated dredgings. Must not contain fines.	MN
17 05 08	Track ballast other than those mentioned in 17 05 07	MN
17 09 04	Mixed construction and demolition waste comprising granular material	MN
19 12 05	Glass Does not include glass from cathode ray tubes.	AN
19 12 09	Minerals (for example sand, stones)	AN
20 01 02	Glass Must not include fibreglass.	AN
20 02 02	Garden and park wastes (including cemetery waste) – soil and stones Must not contain contaminated stones from garden and parks waste.	AN
16 11 04	Refractory	MN
10 02 01	Waste from the processing of blast furnace slag / steel slag	AN
10 02 02	Unprocessed blast furnace slag / steel slag	AN
10 02 99	Slab yard refuse	AN
10 12 08	waste ceramics, bricks, tiles and construction products (after thermal processing)	AN
10 13 14	Waste concrete only	

Wastes having any of the following characteristics shall not be accepted;

- Consisting solely or mainly of dusts, powders or loose fibres; and
- Wastes that are in a form which is either sludge or liquid.
- AN – Absolute Non-Hazardous
- MN – Mirror Non-Hazardous

3.3 Recovered Outputs

3.3.1 Production of Aggregate

Several of the wastes identified in Table 3-1 are listed as inert wastes in the WRAP Quality Protocol (WRAP QP) for the *Production of Aggregates from Inert Waste* (October 2013). Provided these wastes are not contaminated, this means that they can be used as feedstocks to produce aggregates. If the requirements of the WRAP QP are satisfied during their production, the aggregates will have ceased to be waste and no longer subject to waste controls.

More recently, the Environment Agency has published a series of Quality Protocols (QPs) which outline when a waste derived material can be regarded as a non-waste product and no longer subject to waste controls. One of these QPs is titled *Aggregate from waste steel slag (Steel QP)*. If an operator can demonstrate that their production of aggregates meets the standard set out in the Steel QP, and the rules for all QPs, then the aggregates may be regarded as fully recovered and no longer subject to waste controls.

Many of the wastes listed are therefore recognised feedstocks for the production of aggregates. In addition to the requirements of a Waste Treatment Environmental Permit, their production will therefore also be subject to Factory Production Control.

3.3.2 Soil for Capping

At Llanwern, Tata has started capping East Waste Management Site (EWMS) landfill which is located on the Northern side of Queensway at the far eastern end of the works. To complete the capping, a further 100,000m³ of soil is required to provide a durable and sustainable restoration surface above the capping systems. Similarly, at SSQ, Construction Quality Assurance (CQA) plans for the restoration and closure of Lagoons 25 and 27 respectively are being reviewed and updated (having previously been submitted to NRW) and these schemes require some 100,000 m³ of capping soil. As a consequence, there is a high demand for large volumes of soil in the immediate vicinity.

As part of this bespoke Permit, candidate soils will be accepted, processed (if required), temporarily stored and then transferred to storage areas directly adjacent to the landfills to be capped. Processing will involve sorting and separating as candidate soil sources will be carefully vetted and only once they meet the soil chemistry required by each capping scheme will they be accepted.

3.4 Permitted Activities

In each area, the waste will be temporarily stored and processed according to the techniques summarised in Table 3-2. In the second column of Table 3-2 are the process limitations.

Table 3-2 Proposed Waste Processing Activities

Proposed Recovery and Disposal Codes applicable at the Site	Indicative Description of Proposed Activities
R13: Storage of wastes pending the operations numbered R3 and R5. R3: Recycling or reclamation of organic substances which are not used as solvents. R4: Recycling/reclamation of metals and metal compounds R5: Recycling or reclamation of other inorganic materials.	Treatment of listed wastes consisting only of sorting, separation, screening, crushing and blending of waste for recovery as a soil, soil substitute or aggregate. Washing of selected waste will occur in Area 2_10. Secure storage of listed wastes pending treatment. Storage of wastes shall not exceed 150,000 tonnes in total at any one time. No more than 300,000 tonnes of waste shall be treated per year. Where disposal is required, this will be undertaken in accordance with Duty of Care and legal requirements.

3.5 Factory Production Control

For operators to benefit from WRAP and Steel QPs operators must:

- use only the correct waste as feedstocks
- make only the permitted products
- comply with the relevant European standard, specification and quality controls for the product being manufactured with all required tests being met and the aggregate needing no further treatment, weathering or size reduction before use
- have a manual of Factory Production Control (FPC)
- have marked the product to the CE requirements of the Construction Products Regulations
- transport, store, handle and process the wastes and the final product following good practice guidelines
- supply the customer with delivery documents confirming the product meets the quality protocol

DLS will ensure that the aggregates produced are done so in accordance with a FPC that provides a record of all policies and methods for managing the waste material - from waste arriving through to storage, processing, transport, and delivery of quality protocol approved products. The FPC will essentially be a management system focussed on the production process which aims to ensure that product quality is consistently maintained to the required specifications. Evidence of its adoption and implementation will be achieved through scheduled controls and tests on measuring equipment, raw materials and constituents, processes, machines and manufacturing equipment and finished products, including material properties in products. Most importantly, the system will provide evidence for conformity assessment and for the management of non-conforming products.

4 SITE INFRASTRUCTURE

4.1 Access and Security

The operation at SSQ will benefit from the 24 hr manned security provided for the main steel works. During operating hours a further level of security is provided.

All deliveries will be scheduled under normal operating conditions and any deliveries from off-site will only be made by drivers who have been inducted to the site rules.

4.2 Site Accommodation

A single temporary office will be provided as welfare accommodation for the operatives involved with the operation.

4.3 Working Platform

The treatment areas benefit from a stable level hardstanding platform. The platform principally comprises granular slag.

4.4 Recovery Plant

The recovery process will utilise conventional mobile screens and crushers assisted by front loading shovels and tracked excavators. In areas 2_10 a log wash will be used to separate a fine fraction.

5 APPROACH TO EMS

5.1 Environmental Policy

DLS is committed to meeting the requirements of relevant legislation, the efficient use of natural resources & energy, and preventing pollution by continuously reducing the environmental impact of its operations & products through the adoption of sustainable practices.

In implementing the Policy the following key principles will be demonstrated:

Management Systems

Effective environmental and energy management systems will be implemented and maintained, and these will ensure the environmental awareness of the workforce, encouraging every employee to act in an environmentally responsible manner.

Continuous Improvement

The environmental impact of processes and products will be assessed and continuous improvement objectives and targets will be established. These will be achieved through process optimisation and through research, development and deployment of new technologies where opportunities present themselves.

Responsible Use of Resources

Efficient use will be made of energy, raw materials and water through adoption and sharing of good practice

Product Stewardship

Material reuse and recycling will be promoted and the environmental effects of products throughout their life-cycle will be communicated to customers.

Monitoring and Reporting

Environmental and energy performance will be monitored and audited and progress in meeting high-level Policy objectives and improvement targets will be reported publicly.

Responsible Procurement

Key suppliers and contractors will be encouraged to behave in an environmentally responsible manner and to abide by principles similar to those set out within this Policy.

5.2 Awareness of Legal and Other Requirements

DLS shall establish and maintain a procedure to identify and have access to current legal and other requirements that are applicable to the environmental aspects of its activities.

The environmental management representative will consider all legislative requirements that have been identified as being applicable to the sites environmental aspects, and will ensure that all relevant aspects of the business are aware of the legislative responsibilities and requirements. A log of all currently applicable legislation will be maintained.

5.3 Environmental Objectives & Targets

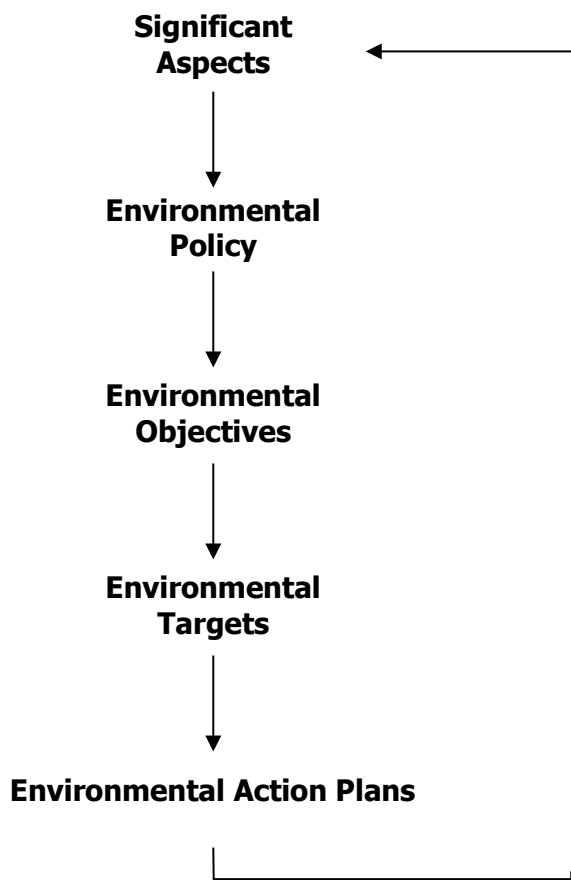
DLS is committed to continual environmental improvement. To achieve this goal, DLS will set key environmental objectives and targets that are directly linked to its environmental aspects and environmental policy and that are achievable, and where practicable, may be quantified. DLS shall establish and maintain documented environmental objectives and targets.

Objectives will be identified and defined as part of the ongoing evaluation of the sites environmental performance, legal requirements and Permit requirements. Implementation of the objectives and targets will be monitored by the environmental management representative, ideally on a monthly basis initially, to ensure acceptable progress and to help identify any additional resources or inputs that may be required.

DLS recognises that the main way in which environmental improvements will be achieved and implemented is if their progress is planned and sufficient and timely resources are committed. Every environmental objective will have a documented programme behind it.

Each action plan will be assigned to designated personnel and clearly documented. The overall process to identify action plans is summarised overleaf.

Flowchart 5-1 Links between Significant Aspects and Action Plans



Action plans may be documented in different ways depending upon the type of objective, the range of personnel involved and its complexity. The environmental management representative will track the performance of the implementation of the objectives.

5.4 New Objectives

DLS recognises that the processes used to treat waste at the site could change over time as the business develops and in response to external drivers. Should new waste types, new plant, equipment, processes and buildings be required the environmental management representative will undertake a review of the planned changes and identify the environmental aspects that will require management during all phases of development and implementation. Such changes will likely result in new action plans being developed and possibly also Variations to the Permit. DLS recognises that early consultation with NRW is critical to ensuring that the correct outcomes are achieved.

6 SITE SPECIFIC EMS

6.1 Scope of EMS

The management system will need to reflect the environmental risks the waste operations pose to the environment and controls that will need to be in place. For this reason, the scope of the EMS will be directly linked to the Environmental Risk Assessment For the site.

6.2 Exposure Pathways and Pollution Controls

The environmental risk assessment indicates that the proposed operations will not significantly adversely impact the environment provided the site is operated in accordance with a documented EMS. Some of the activities which will need to be documented in the EMS are listed in Table 6-1 with the associated recording forms in Table 6-2. As each of these activities has the potential to impact the environment, each of these will be provided with a procedure and associated standard form.

Table 6-1 Some of the Procedures to be Documented in the EMS

Operation of processing plant
Operation of vehicles and materials handling plant
Noise from site activities
Fire
Flooding
Vehicle movements
Materials handling
Storage of liquids e.g. diesel
Fuel Delivery and offloading
Maintenance of vehicles and plant
Management of surface water run-off
Waste acceptance, placement and inspection
Non-compliant waste management
Management of Quarantine Area
Management of site drainage
Preventative Maintenance Programme – vehicles
Preventative Maintenance Programme – plant
Complaints Management
Product Management
Waste Transportation
Coordinating Site Visitors
Manual Sorting
Loading and Unloading Processing Plant
Stockpiling Waste
Stockpiling Products
Collecting Samples for Testing
Working around plant and vehicles
Personal Protective Equipment (PPE and RPE)
Refuelling Plant and Vehicles
Site Security
Method Statement of Production
Product Inspection and Testing
Product Handling and Storage
Product Non-Conformance
Evaluation of Environmental Aspects
Procedure for Ensuring Compliance with Environmental Legislation

Table 6-2 Some of the Forms to be Included in the EMS

Register of Environmental Aspects
Evaluation of Environmental Aspects under Normal Conditions
Evaluation of Environmental Aspects under Abnormal and Emergency Conditions
Register of Significant Environmental Aspects
Log of Environmental Legislation
Environmental Action Plan
Personnel Skills Matrix
Personal Training Record
Customer Complaint Form
Customer Complaint Log
Obsolete Document Register
Accident and Incident Record
Delegation of Responsibilities
Non-conformance corrective action
Job Specific Method Statements
Maintenance Checklist
Maintenance Record
Environmental Monitoring Records
Calibration Log
Audit Programme
Audit Report
Management Meeting Agenda
Management Meeting Minutes
Non-Compliant Waste Form
Register of Waste Deliveries Form
Daily Process Control Record Form
Product Non-Conformance Form
Register of Waste Deliveries
Record of Non-Compliant Wastes
Emergency Plan
Maintenance, Service, Calibration Schedule
Site Inspection Form
Emergency Drills

6.3 Compliance with Permit Conditions

In the full EMS, the requirements of the Permit will be clearly set out against the relevant sections of the EMS to ensure that all requirements of the Permit are effectively implemented.

7 TECHNICAL COMPETENCE

DLS recognises that an EMS should not be viewed in isolation as many aspects of the business can impact on the successful implementation of the EMS. DLS also recognises that the role of the management representative is not to undertake all of the work required to implement the EMS. For this reason, DLS will document the roles and responsibilities for all personnel. Key authorities and responsibilities will be defined, documented and communicated to all employees.

All employees will be made aware of their responsibility in achieving conformance with the environmental policy and the requirements of the EMS. Table 7-1 summarises the basic requirements for different levels of employees.

Table 7-1 Minimum expectations for Personnel

Title	Responsibility
Top Management	Define and approve issue of the environmental policy Nominate an environmental management representative Review the EMS at set intervals
Management	Provide sufficient resources essential to the implementation and control of the EMS
Management Representative	Ensure establishment of EMS and reporting on performance to the top management
Site personnel	Responsibilities are dependent upon their role

7.1 Operator Competence

DLS recognises that to operate under a Permit, trained and competent staff are required.

DLS will ensure that a written management system is in place that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints. This system will be subject to regular audit.

The TCP will not be the sole individual responsible for ensuring compliance with the Permit or implementing the EMS as this requires input from all relevant personnel involved with the permitted activities.

7.2 Relevant Training

All relevant staff working on the permitted activities will be trained on the requirement of the Permit and the EMS. To assist with management of training records and needs, DLS will regularly undertake analysis to identify skill gaps and record all training on the relevant forms. DLS will ensure that all relevant staff are:

- trained in aspects that can lead to pollution and the measures to be taken to prevent that pollution.
- trained to deal with accidents.
- aware of responsibilities under the Permit.
- aware of the importance of equipment and plant maintenance.

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- competent to operate machinery and provided with safe operating instructions for that equipment or activity.
 - appropriately inducted, including contractors.

Records of training will be maintained.

The management of DLS is fully committed to protecting the environment and demonstrating continual environmental improvement. Through effective training, communication and delegation, DLS will encourage all relevant employees to be committed to the full implementation of the EMS.

8 WASTE MANAGEMENT

Ensuring that the waste accepted at the site is in accordance with the Permit is fundamental to its sustainable operation. As part of the full EMS, DLS will document each step to be taken and these actions will be embedded into the staff training programme. The principles of the methodology are outlined below.

8.1 Waste Acceptance

8.1.1 Wastes from Open Market

When opportunities arise on the open market, a relevant DLS representative will handle the enquiry and visit the potential waste source to ensure it would meet the terms of the Permit and that the waste producer is aware of limitations and Duty of Care.

Once all contractual arrangements are in place plans would be put in place for the waste to be transported. This would include ensuring that all relevant personnel are inducted in the site rules. The waste would then be subject to the same controls as the waste arising from SSQ.

8.1.2 Waste at SSQ

1. Generally, a minimum of 24 hours notification (or less by arrangement) of waste being delivered to site shall be implemented, particularly if the waste is arising from a new area.
2. Prior to the waste being brought to the site the waste must be classified. The producer must provide information with respect to the waste's relevant EWC code, appearance and process applied to create the waste.
3. On delivery and, if necessary, the waste carrier shall present a Duty of Care certificate/ Waste Transfer Note (WTN) at the weighbridge. This is to be compared against the initial enquiry and the Waste Producers waste classification. If they are unable to produce valid certification, the waste shall be rejected and the incident recorded in the site diary.
4. If the waste is NOT as described or is not accepted within the terms of the Permit it shall be deemed to be NON-COMPLIANT. All non-compliant wastes shall be rejected and the incident recorded in the NON-COMPLIANT WASTE FORMS.
5. If valid certificates are produced and have been reviewed, a visual inspection of the waste should be undertaken. This is to ensure the waste is in compliance with the WTN, the Permit and the driver's description.
6. All NEW waste carrier drivers are to undergo site induction and also sign the safe working procedure form provided at the site office.
7. If the waste IS acceptable, the following information shall be recorded on the RECORD OF WASTE DELIVERIES RECORD FORM held at the site office:
 - a) Estimate of the volume/weight of waste in the vehicle
 - b) Category/EWC Code of the waste
 - c) Time of delivery
 - d) Vehicle Registration
 - e) Site address of waste
 - f) Name of waste carrier

8.2 Waste Inspection and Weighing

On acceptance of the waste at the weighbridge the waste shall be weighed (gross weight) and the value recorded. The empty waste vehicle shall be re-weighed on exit (net weight) and the value recorded. The weight of the waste will be GROSS minus NET weights. The weight of the waste delivered is to be recorded on the REGISTER OF WASTE DELIVERIES FORM.

8.3 Waste Input Recording

1. Collate and submit waste data to the NRW in accordance with Permit requirements.
2. All records of received and removed waste are to be stored for a minimum period of 2 years.
3. All records of non-compliant wastes rejected from site are to be stored for a minimum period of 2 years.
4. All records of product from site are to be stored for a minimum period of 2 years.

8.4 Waste Delivery to Working Area

1. Following correct classification and acceptance of the waste, the driver shall be given directions.
2. If any new drivers are unsure of the correct location, contact (radio/telephone) between the Site Manager and the operating staff will take place to ensure the waste lorry arrives at its correct destination.
3. The operational staff will guide the waste lorry driver to the correct area for controlled discharge.
4. The waste receiving areas will be clearly marked with a sign to ensure no cross-contamination of waste streams or product stockpiles.

8.5 Identification and Management of Non-compliant Wastes

1. Non-compliant wastes will be rejected. The occurrence of such wastes will be recorded on the NON-COMPLIANT WASTE FORM. A comment may also be made in the Site Diary. The information to be recorded will include:
 - a) Date and Time
 - b) Description of Waste
 - c) Details of Non-compliant waste
 - d) Details of action taken
 - e) Name and address of Waste producer
 - f) Vehicle Type
 - g) Vehicle Registration
 - h) Waste Carrier Details
 - i) Waste Transfer Note Number
 - j) Details of final waste destination
2. If it is safe to do so after discharge, the noncompliant waste will be re-loaded onto the lorry and the driver will be instructed to take the waste back to the site office.
3. At the site office, establish and record where the waste will be taken if it leaves the site.

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4. If, in the interests of the environment, it would be best served by allowing the load to be stored on site, then the waste shall be retained on site in the quarantine area.
 5. If necessary, NRW shall be informed by telephone immediately and a record kept of the conversation and with whom.
 6. Steps taken to safely dispose of the waste (after liaison with NRW) should be documented– typically this will involve returning it to the waste producer.

9 FACTORY PRODUCTION CONTROL

In addition to the procedures to be set out in the EMS for waste acceptance, Factory Production Control (FPC) systems will also be established for the production of aggregates under Quality Protocols, one for the production of aggregates from inert waste (the WRAP Quality Protocol) and one for the production of aggregates from steel slag (Steel Slag Quality Protocol). The FPCs will extend beyond the requirements of the EMS to demonstrate that the waste has ceased to be waste and that a product has been manufactured or waste recovered. However, there will be significant overlap with the EMS to ensure risks to the environment are managed and documented.

The overall process of Factory Production Control is summarised in the flow chart below with further detail provided in the following sections.

Method Statement of Production

1. All operational staff are to be fully trained in the waste recovery operations including:
 - a) Location of different waste
 - b) Types of waste
 - c) Location of finished products
 - d) Types of finished Products
 - e) Manufacture of different finished products

The areas of waste and finished products will be clearly signposted.

2. Operational staff will be informed and trained in the production requirements of each product and the plant to be used to produce the products.
3. The recycling process will involve the operation of dedicated equipment. Records of maintenance of these pieces of equipment will be kept in accordance with MAINTENANCE RECORDS. All Plant will be subject to a Preventative Maintenance Programme.
4. Relevant operational staff will be trained in the operation of the plant and a record of this training kept at the site office in accordance with TRAINING RECORDS.

9.1 Product Inspection and Testing

1. The manufacture of finished product will be recorded by operational staff on the DAILY PROCESS CONTROL RECORD. During the process the operational staff will visually inspect the material produced to assess if it complies with the required specification. Comments about process difficulties should be recorded on this form.
2. Where necessary, each of the products will be routinely sampled and tested to assess the quality of the product. The assessment criteria will be based on customer required and published standards.
3. A schedule of testing shall be forwarded to the laboratory.
4. The testing records received from the laboratory will state whether the material conforms with the requirement of the end product as manufactured, or specified by the client. The testing records shall be examined by the Operation manager.
5. Non-conforming products will be identified. The cause will be investigated and recorded on NON CONFORMING PRODUCTS FORM in accordance with the relevant procedures.

9.2 Product Handling and Storage

1. The manufactured finished product will either be:
 - a) Moved to a stockpile
 - b) Left in-situ immediately after processing ready for sale
2. Product stockpiles will be kept separate and away from waste stockpiles to avoid cross contamination.
3. The finished products will be clearly marked with signs.
4. The finished products will be handled/moved/loaded using a front end shovel or if necessary, using an excavator.
5. The operational staff will be responsible for the cleanliness of the machinery used in the handling of the finished product in order to avoid cross contamination. If necessary, cleaning will involve washing out the buckets of either shovel or excavator.
6. If cross contamination occurs, the product stockpile will be cleaned of any contaminated material. The contaminated material removed will be placed into the appropriate waste stockpile to await re-processing.

9.3 Product Non-Conformance

1. On receiving a complaint or non-conforming laboratory test result, an investigation to determine the root cause will be undertaken. The DAILY PROCESS CONTROL RECORD FORMS will be evaluated to see if any indication is provided. The issue would be discussed with the relevant operating/processing staff to try and establish the cause of the problem.
2. The non-conforming material shall be either:
 - a) Reprocessed
 - b) Used for another end use for which it is suitable
 - c) Rejected and marked as being non-conforming
3. If the material has already been sent to a client, then an agreement will be made as to the course of action taken.
4. If the causes of the non-conformance can be established then a series of corrective actions will be implemented and documented. These could include:
 - a) Examination of the testing procedure, which may result in adjustments
 - b) Analyse the processes, operations, quality records sampling reports and customer complaints to see if any causes can be established
 - c) Initiate preventive actions to deal with the problems to a level corresponding to the risks encountered
 - d) Apply additional controls to ensure effective corrective actions are taken
 - e) Implement and record changes to the management system procedures involved in any corrective action
5. The PRODUCT NON-CONFORMANCE FORM is to be filled in during and after the non-conformance event has occurred.

10 POLLUTION CONTROL AND MONITORING

10.1 Pollution Control Measures

DLS will ensure that a current Environmental Risk Assessment has been completed and is reviewed annually. This is to ensure that the documented management system is directly linked to the potential environmental impacts of the activities.

At this stage, the risk assessment indicates that the proposed activities pose a low risk to the identified environmental and human receptors provided a series of controls are implemented during operations. These controls are outlined in the following sections.

10.1.1 Controlled Water

The storage and processing areas will be checked daily as part of the daily site inspection. The control measures to be checked will include:

- Containers and bunds will be inspected and maintained.
- Written management system is in place for the identification and minimisation risks of pollution.

10.1.2 Flooding

In the event of flooding, the following steps would be taken (only where safe to do so):

- Wastes, liquids and other materials with potential to be washed from the site shall be removed from site (or relocated within the site) to areas less likely to be affected by floodwater

10.1.3 Noise and Vibration

Site noise is only likely to occur as a result of the movement of plant and vehicles on site or during use of recycling equipment.

All vehicles and plant used at the facility will be modern and fitted with exhaust silencers. They will be subject to a preventative maintenance programme as recommended by the manufacturer.

An auditory inspection shall be carried out by the site manager at least twice per day. Noise levels which are considered higher than usual shall be investigated and recorded in the site diary.

The following measures will be taken to minimise the risk of noise and vibration:

- Access roads will be kept in a reasonable condition such that potential noise from vehicles is minimised;
- All plant machinery will be subject to regular inspection and preventative maintenance;
- Equipment shall be switched off when not in use; and
- Treatment operations shall be arranged in such a way as to minimise noise production as far as possible.

If notified by Natural Resources Wales that the activities are giving rise to pollution outside the site due to noise and vibration, the Operator will submit a noise and vibration management plan to NRW.

10.1.4 Air Quality

Operations potentially giving rise to dust generation include:

- Waste receipt and stockpiling;
- On-site transfer of materials between stockpiles and processing areas;
- Processing operations such as screening and crushing;
- The loading of processed materials onto vehicles;

The following measures will be taken to minimise dust release:

- Loads shall be checked for dust generating materials during acceptance and upon tipping;
- Vehicle speeds shall be limited;
- The use of dust suppression comprising a hose spray within the processing area; and
- Deployment of a mobile water bowser to all areas as required.

10.1.5 Litter

Due to the nature of the waste and waste acceptance and inspection procedures, the likelihood of windblown litter from the waste is very low.

The following measures will be taken to minimise the risk of litter:

In the event of litter being detected, the following measures will be taken:

- Any litter that is blown outside of the site boundary will be collected.
- The litter collected will be deposited in the relevant container, either for recycling or disposal.

10.1.6 Vermin

Due to the nature of the waste and waste acceptance and inspection procedures in place, there is very low likelihood of wastes being present that attract pests.

The following measures will be taken to minimise the risk of pests:

- Waste inspected before tipping to identify potential contaminants;
- Quarantine non-conforming wastes and arrange for removal off site;
- Daily visual monitoring for pests and vermin.

Good housekeeping and regular inspection of accommodation facilities.

Details of any pest control activities implemented will be recorded.

10.1.7 Odours

Due to the nature of the waste acceptance inspection procedures in place, there is a very low likelihood of odorous waste being received at the facility. There are also few receptors.

The following measures will be adopted to minimise the risk of odour release:

- Rigorous site waste acceptance procedures;
- Rejection (and recording) of problematic wastes;
- Provision of dedicated quarantine area.

If notified by NRW that the activities are giving rise to pollution outside the site due to odour, an Odour Management Plan will be provided to NRW for review and approval.

10.1.8 Fire Prevention

The waste to be accepted and process is not explosive or flammable. The main risk of fire at the site will therefore be associated with vehicles and plant.

In the event of a fire, all-essential personnel will be evacuated and in the case of a minor incident, fire extinguishers or water spray will be applied.

The following measures will be taken with respect to fire prevention and control:

- Smoking only permitted in designated areas.
- Suitable and adequate firefighting materials and equipment will be maintained and kept at appropriate locations on the site as advised by the on-site fire wardens.

10.1.9 Leaks and Spills

Spill equipment will be available at the site weighbridge and processing areas. To minimise the risk of leaks and spills, the following procedures will be implemented:

- Delivery of fuels and oils will be supervised.
- The quantity of fuel in storage will be checked, prior to the fuel delivery. The maximum residual capacity of the tank will be determined prior to the commencement of re-filling to prevent overtopping.
- All hydraulic, lubricating and waste oils will be stored in accordance with PPG.
- All containers stored at the facility will have their contents and capacity clearly marked.
- Operational staff will receive pollution prevention and spill response training.

10.1.10 Other Fugitive Emissions

The following procedures will be taken to control fugitive emissions:

- All plant and vehicles will be subject to regular inspection and preventative maintenance;
- Vehicles shall be compliant with relevant exhaust emissions standards;

10.2 Environmental Monitoring

Despite the environmental risk assessment indicating that the proposed activities pose a low risk to the environment DLS will:

- Ensure that daily inspection are made by the site supervisor and that observations are recorded
- Record the production of recovered materials

11 PLANNED PREVENTATIVE MEASURES

11.1 Maintenance

DLS recognises that many pollution incidents are a consequence of a maintenance failure. To avoid such incidents, a Planned Preventative Maintenance programme will be in place. The Plan will include routine checks of plant, machinery, infrastructure and drainage systems that could influence the environment. The Plan will be directly linked to the Environmental Risk Assessment.

DLS will investigate malfunctions, breakdown or failure of plant and equipment, techniques and near misses, releases to the environment, or impacts on the local amenity. The Plan will be documented.

Most vehicular maintenance will be undertaken in off-site dedicated areas.

11.2 Pollution Prevention

DLS will ensure that all aspects of site development are undertaken in accordance with the current Pollution Prevention Guidance issued by NRW.

12 INCIDENTS & EMERGENCIES

DLS recognises that accidents can cause pollution. For this reason a detailed incident management plan will be developed and will be reviewed as site works progress.

12.1 Emergency Site Plans and Contact Details

As part of the incident management plan a clear diagram of the site layout and access details, along with a schematic representation of the site systems will be produced. Features that will be included on the plan will be:

- access routes and meeting points for emergency services.
- the location of process areas.
- controlled water receptors.
- inspection points to detect pollution.

Alongside the detailed site plans, the response plan will detail the key contact details who may need to be informed in response to an emergency.

12.2 Planning

DLS will assess the potential for negative environmental impacts to arise out of abnormal operating and emergency conditions using a systematic process underpinned by risk assessment. From this assessment, DLS will identify and document significant aspects to enable environmental action plans to be developed. This assessment will be typically annually reviewed.

Reviews will also be undertaken following any accidents and emergencies and in response to any employee reporting a hazard.

DLS recognises that causes of environmental incidents are varied but could include:

- delivery and use of materials.
- overfilling containment vessels.
- plant or equipment failure.
- containment failure.
- fires, explosions or failure to contain firefighting water.
- incompatible materials coming in contact.
- uncontrolled reactions.
- Vandalism.
- flooding.

Any of these incidents could affect:

- surface waters, aquatic ecosystems, groundwater and soil.
- air quality by producing toxic fumes and airborne pollutants which may damage human health, wild and domestic animals and ecosystems.
- thermal radiation which can harm people and the environment.

An overview of the aspects to be included and adopted in the plan are provided in Table 13-1.

Table 12-1 Emergencies to be Evaluated as part of full EMS

Possible Accident/ Incident	What Would The Harm Be?	How will DLS Reduce Likelihood of Accident Occurring?	What To Do If It Happens?
Spillage from Vehicle e.g. diesel delivery	Contamination of land/water/air, injury to individuals.	Ensure all materials are secured before transport; containers are suitable to hold the material and are not damaged. Also follow risk assessment procedures to minimise risk of incident occurring.	Procedure to be listed in emergency plan
Vehicle Fire	Damage to equipment/vehicle/plant/buildings, contamination to land/water/air, injury to individuals and inconvenience to community.	Ensure preventative maintenance programme is implemented including daily checks by drivers.	Procedure to be listed in emergency plan
Vehicle Breakdown	Damage to vehicle, injury to individuals.	Ensure preventative maintenance programme is implemented including daily checks by drivers.	Procedure to be listed in emergency plan
Vehicle Accident	Damage to vehicle, injury to individuals.	Ensure preventative maintenance programme is implemented including daily checks by drivers. Ensure staff are trained in use of vehicles and plant.	Procedure to be listed in emergency plan
Injury (Minor/Major)	Injury to individuals, damage to equipment.	Ensure all employees follow the procedures outlined in risk assessments when carrying out specific tasks.	Procedure to be listed in emergency plan
Plant & Property Damage	Injury to individuals, damage to equipment.	Ensure all employees follow correct procedure when operating equipment.	Procedure to be listed in emergency plan
Flooding	Injury to individuals, damage to infrastructure and off-site mobilisation of waste and potential contaminants.	Layout of site to accommodate predicted flood extent. Ensure emergency plan is in place and staff and visitors are aware of emergency responses and access / egress routes.	Procedure to be listed in emergency plan

12.3 Establishment of Contingency Actions

Based on the assessment of abnormal and emergency conditions DLS will develop relevant emergency response procedures. Where necessary, additional training will be organised and documented. The procedures will also detail the internal/external communication procedure during and after the occurrence of abnormal and emergency conditions.

12.4 Testing of Emergency Preparedness

DLS will periodically test all procedures where practicable. The results of the tests will be documented.

13 COMMUNICATION AND COMPLAINTS

13.1 Internal Communication

DLS is committed to ensuring that the requirements of the Permit and the EMS will be fully implemented. One of the key ways of achieving this is through clear communication with all employees to ensure that the requirements are understood, available and fully integrated to routine site work. This will be achieved by various means including signage, meetings, environmental awareness training sessions, tool-box talks, inductions, signage and posters. Particular attention will be paid to ensure that sub-contractors are aware of the relevant requirements.

13.2 External communications

Dialogue with external parties may include submittal of information to external parties, receipt of requests for information, receipt of complaints and dialogue with NRW. In the majority of cases, the Technically Competent Person (TCP) or Site Manager will be the initial point of contact. All communication will be documented.

DLS takes complaints seriously and will take the necessary actions to investigate the complaint. If a complaint is valid DLS will:

- identify the cause.
- minimise the impact of the activity causing the problem.
- investigate the root cause of the problem.
- take steps to ensure the problem is not repeated.
- record the complaint and what actions were taken to investigate and resolve it.
- amend the EMS if necessary.

14 MONITORING AND MEASUREMENT

14.1 Proof of Control

DLS recognises that a key aspect of any EMS is to document the operation of the EMS so that its effectiveness can be scrutinised and any shortcomings identified. This will be achieved through thorough relevant training and routine assessment of working instructions and records for both employees, contractors and suppliers.

14.2 Monitor and Measure

DLS will document implementation of the proposed waste operation and pollution control measures adopted. Records shall include waste acceptance, waste delivery, waste placement, preventative maintenance programmes, product production and environmental monitoring.

15 INTERNAL AND EXTERNAL AUDITS

The environmental management representative will establish a rolling audit programme that ensures each aspect of the EMS is audited at least annually. More frequent audits will be undertaken on the more sensitive procedures and aspects. The principle aim of the audit will be to determine whether or not the EMS conforms to planned expectations and is being effectively implemented and maintained. The environmental management representative will provide feedback regarding the audit process to management. The audit findings will be recorded.

16 NON-CONFORMANCE, CORRECTIVE & PREVENTIVE ACTION

16.1 Continual Improvement

Through monitoring of performance, DLS will seek to identify non-conformance issues requiring action to ensure continued environmental performance and full implementation of the EMS. DLS will seek to identify non-conformance issues through a variety of means including outcomes of audits, incident reports, reviews of legislation requirements and complaints.

16.2 Investigation of Failings

Following identification of non-conformance issues, the environmental management representative will lead an investigation into the root causes and identify ways in which the issues can be avoided in the future. The review will also aim to identify any ways in which the EMS may be improved. This may require specialist input from internal and external parties. This process will lead to corrective and preventative action plans being developed and tracked.

17 RECORDS, REPORTING AND NOTIFICATIONS

The Permit will require records to demonstrate that the activities are in compliance with the EMS.

17.1 Controlled documents

This summary EMS outlines some of the relevant procedures and forms that will be required to document the proposed waste activity. All documents will be controlled and issued by the Technically Competent Person (TCP). One of the responsibilities of the environmental management representative is the maintenance of this documentation.

17.2 Location of documents

All relevant documents will be available on site and routinely backed up.

17.3 Review, Update and New Documentation

DLS will periodically review the EMS. Only authorised personnel are able to make amendments to documentation in consultation with the TCP Environmental management. All employees will, however, be encouraged to provide feedback regarding the documentation to ensure it remains fit for purpose.

17.4 Document Issue and Removal

DLS will ensure that all current versions of the documentation are reviewed, updated and issued to all the relevant parties. Any documentation not required will be clearly identified through the use of an obsolete records system.

17.5 Document and Record Retention

DLS will ensure that all documentation will:

- be legible.
- be made as soon as reasonably practicable.
- if amended, be amended in such a way that the original and any subsequent amendments remain legible or are capable of retrieval.
- be retained for at least 6 years unless they relate to off-site environment effects or matters relating to the condition of the land, groundwater and surface water, in which case they will need to be retained until the Permit is surrendered.

17.6 Reporting to NRW

DLS will report relevant waste records to NRW at the required intervals set out in the Permit.



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