

**Alan's Skip Hire (Wales) Ltd**

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**MANAGEMENT SYSTEM**

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**Wrexham Recycling Facility  
Redwither Road, Wrexham Industrial Estate  
Wrexham LL13 9RD**

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Document Reference: 2520/426/EMS/01

Prepared by:



**Oaktree Environmental Ltd**

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| *To be located or subsequent revisions |                      |

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**Appendix III** – Permit conditions including waste types

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**Appendix VI** - Odour Management Plan

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and initial Dustscan Report October 2014

**Appendix VIII** – Fire Prevention and Risk Plan

**Document history:**

| <b>Document Versions</b> | <b>Issue date</b> | <b>Status</b>         | <b>Revisions/comments</b>                                                                                                                                     |
|--------------------------|-------------------|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.0                      | 18 February       | Draft                 | To accompany draft permit conditions                                                                                                                          |
| 2.0                      | 22 July 2013      | Draft                 | As requested in permit variation                                                                                                                              |
| 2.1                      | 26 July 2013      | For submission to EA  | As requested in permit variation                                                                                                                              |
| 2.2                      | 20 August 2013    |                       | Update drainage details for newly concreted areas in top yard and to include additional conditions for EWC 19 08 01 as part of the Minor Technical Variation. |
| 3.0                      | 17 January 2014   |                       | Updated section 3.8_Duty of Care requirements                                                                                                                 |
| 4.0                      | 7 February 2014   | Draft                 | Application to add additional treatment activities and increase annual tonnages                                                                               |
| 4.1                      | 28 March 2014     | For submission to NRW | Permit Variation application to add additional treatment activities and increase annual tonnages                                                              |
| 5.0                      | 21 November 2014  | For submission to NRW | Revision in response to the Schedule 5 Notice and also includes reference to Fire Prevention & Risk Plan (FPRP)                                               |

## 1.0 GENERAL CONSIDERATIONS

### 1.1 Site operator/permit holder

- 1.1.1 Environmental Permit No. EPR/WP3094FB (EAWML 37211) permits the keeping and treatment of waste at the site which is the subject of this environmental management system. The permit was transferred to the site operator, Alan Skip Hire (Wales) Limited, on 9<sup>th</sup> June 2005. The original permit was issued to AM Reclaim Ltd on 9<sup>th</sup> March 2000. The site mainly receives waste from Alan Skip Hire (Wales) Limited's own operations and predominantly a limited tipping facility for a wide range of regular customers from North East Wales and the surrounding area.
- 1.1.2 Developments in legislation such as the introduction of the landfill tax have increased the effectiveness and scope of operations for waste transfer and recycling centres, permitting greater recovery rates for recyclable waste. This management system has been drafted in response to the recent permit modification and also to reflect operations which have been implemented to reduce the volume of waste which is sent to landfill by the operator. The recycling operations include sorting household, commercial and industrial waste to produce feedstock for operations producing building materials, topsoil, hardcore, aggregate replacements and other products including processing of waste wood for use in the manufacturing industry which reduce the need to use virgin products.
- 1.1.3 The registered address and site office for Alan Skip Hire Limited is as follows:

Alan Skip Hire Limited  
Broughton Mill Road  
Bretton  
Flintshire  
CH4 0BY

Company Registration No. 03225657

Contact: Mr Neil Hassall  
Position: Director  
Tel: 01244 660422  
Fax: 01244 661652

Site Address  
Redwither Road  
Wrexham Industrial Estate  
Wrexham LL13 9RD  
Technical Competent Manager Mr Neil Hassall

- 1.1.4 Oaktree Environmental have been employed to act as consultants for Alan Skip Hire (Wales) Limited, to revise the management system. The document provides information to Natural Resources Wales to enable it to set permit conditions and gives instructions to staff specifying how the site is managed. Contact details for Oaktree Environmental are as follows:

|          |                                                                                                    |                                        |
|----------|----------------------------------------------------------------------------------------------------|----------------------------------------|
| Contact: | Marco Muia                                                                                         | Jan Edwards                            |
| Title:   | Director                                                                                           | Senior Consultant                      |
| Mobile:  | 07767-761252                                                                                       |                                        |
| Tel:     | 01606-558833                                                                                       | Fax: 01606-861182                      |
| Address: | Oaktree Environmental<br>Unit 5 Oasis Park<br>19 Road One<br>Winsford Industrial Estate<br>CW7 3RY | E-mail:jan@oaktree-environmental.co.uk |

## 1.2 Site Location

- 1.2.1 The site is located at Redwither Road, Wrexham Industrial Estate, National Grid Reference SJ 3830 4938 as shown on Drawing Nos. 6368/1 and 6544/1. The site has Planning Consent for a Waste Transfer Station. Permission Code Number ABE CB03184.
- 1.2.2 Bounded by general manufacturing works, the site occupies an area of approximately 30,000 square metres on the periphery of the Wrexham Industrial Estate. The Redwither Brook flows through the site.
- 1.2.3 The western part of the site contains the site office, site control facility, vehicle maintenance facility and welfare and car parking facilities. The eastern part of the site contains the process building, and product storage facilities.

## 1.3 Planning & Waste permitting status

- 1.3.1 The site was originally operated by AM Reclaim Ltd with the permit being transferred to the current operator Alan's Skip Hire (Wales) Ltd in March 2005. The permit was varied and consolidated by the Environment Agency in March 2013.
- 1.3.3 The site has the benefit of a valid planning consent issued and regulated by Wrexham County Borough Council.
- 1.3.4 This management system replaces all previously agreed working plans.

#### 1.4 Permit area/waste management operations

1.4.1 The area which is the subject of the environmental permit was originally outlined in red on Drawing No. 484:04:dsj, dated March 1999. For clarity these boundaries are now shown outlined in green on Permit boundary Plan in Schedule 7 of Permit and on Drawing No. 2399/426/02. All references to 'the site' in this management system shall mean this area (the recycling centre) and the associated infrastructure, plant and equipment.

1.4.2 The environmental permit is required for the storage (keeping) prior to removal, and treatment (all types of handling/processing) of waste. Waste treatment processes to be carried out on site include the following:

Compacting (by loading shovel or grab)

Sorting (with loading shovel, 360<sup>0</sup> excavator with grab/bucket or by hand/picking line)

Screening (by using appropriate plant and equipment i.e. trommel screen)

Picking (using a picking line manned by picking operatives)

Magnetic separation of ferrous metals

Wood processing involving shredding, chipping, cutting or pulverising and removing of ferrous and non ferrous metal using magnets and eddy current treatments.

Note: The operation of a crusher is regulated under a Part B Authorisation and does not form part of this management system - further details are outlined in Section 1.10 below.

1.4.3 Specified waste management operations associated with the Schedule 2 activities will include waste disposal and waste recovery operations listed in Annex IIA and IIB of the Waste Framework Directive (Directive 2006/12/EC). They are listed in summary below:

R3: Recycling or reclamation of organic substances

R4: Recycling or reclamation of metals

R5: Recycling or reclamation of other inorganic materials

R13: Storage of waste pending recovery

D15: Storage of waste pending disposal

D9: Physicochemical treatment of waste for disposal

The D9 code refers to the sorting activities which result in a residue of waste with no recycling or reuse potential and which must be disposed of. The site produces less than 50 tonnes per day of such waste. The D15 code refers to the storage of such waste pending its disposal.

## 1.5 Hours of operation

1.5.1 The site is operated during the following hours for the receipt or removal of waste are:

|                      |               |
|----------------------|---------------|
| Monday to Friday     | 06:00 - 22:00 |
| Saturday             | 06:00 - 17:00 |
| Sunday               | 06:00 - 12:00 |
| Bank/Public holidays | 06:00 - 17:00 |

The operating hours for the processing or handling of waste are:

|                      |               |
|----------------------|---------------|
| Monday to Friday     | 06:00 - 18:00 |
| Saturday             | 06:00 - 18:00 |
| Sunday               | 06:00 - 12:00 |
| Bank/Public holidays | 06:00 - 18:00 |

The entrance gates will be closed upon the cessation of daily operations to ensure that there is no unauthorised access.

1.5.2 Floodlights will be used if necessary operations or emergency procedures are carried out after official lighting up times. Mobile floodlights will be made available if additional lighting is required.

## 1.6 Waste types and quantities

1.6.1 The waste types accepted at the site are predominately solid, dry, non-hazardous household, commercial and industrial wastes as defined in the Controlled Waste (England and Wales) Regulations 2012. WEEE waste and ELVs may be accepted for storage and bulking on site. The waste delivered to the site is collected from household, commercial and industrial premises.

1.6.2 A list of the waste types, consisting of the relevant codes and descriptions from the EWC Waste Classification, is attached to this management system in Appendix III.

1.6.3 Other wastes which have not been listed but which fall within the category described in 1.6.1 above will be accepted with the written agreement of Natural Resources Wales. No clinical, special or liquid wastes will be accepted.

1.6.4 The throughput of the site will be limited to a maximum of 750 tonnes per day and <75,000 tonnes per annum. Notwithstanding the daily limit the following limits will apply to individual waste categories:

| <u>Waste type</u>      | <u>Daily maximum input</u> |
|------------------------|----------------------------|
| Inert                  | 750 tonnes                 |
| Non hazardous          | 750 tonnes                 |
| Hazardous waste (ELVs) | 10 tonnes                  |

1.6.5 The maximum amount of waste to be stored on site at any time will be:-

| <u>Waste type</u>         | <u>Max duration of storage</u> | <u>Maximum quantity stored</u> |
|---------------------------|--------------------------------|--------------------------------|
| Untreated inert waste     | 18 months                      | 3000 tonnes                    |
| Untreated mixed non-inert | 7 working days                 | 5000 tonnes                    |
| Grit and screenings       | 14 working days                | 100 tonnes                     |
| Hazardous waste (ELVs)    | 2 months                       | 10 tonnes                      |
| Rejected waste            | 5 working days                 | < 10.0 tonnes                  |
| Unprocessed wood          | 2 months                       | 1000 tonnes                    |
| Processed wood            | 1 months                       | 1000 tonnes                    |
| (PAL waste) *             | 1 month                        | 500 tonnes                     |

\*Processed wood received from wood processing and the production of panels and furniture production manufacturer for further processing through eddy current plant.

The above storage periods will only be varied with the agreement of Natural Resources Wales. The above figures exclude storage of recycled product and sorted waste to be submitted to exempt recycling operations.

1.6.6 If more than 10 tonnes of waste is rejected it will be removed from the site immediately.

1.6.7 If the maximum storage capacity of the site is reached then no further waste will be accepted until waste can be removed from the site and taken to a suitably permitted or exempt site.

1.6.8 Strict requirements will apply to certain types of wastes i.e.

- i. Empty used containers which have contained chemicals or special waste must be cleaned or certified as clean before they will be accepted. Paints tins or other containers will be accepted if they have residues in as long as those residues are solid and non-special.
- ii. Potentially dusty loads or loads containing powder will have to be bagged prior to receipt to prevent a dust problem. No whole loads of powdered waste will be accepted.
- iii. Shot blasting residue will only be accepted from known sources or where the contents of the residue can easily be identified. Residues containing tributyl tin will not be accepted.

## 1.7 Staffing and management

1.7.1 The site will open for the deposit of waste or for other essential operations during the hours listed in Section 1.4 above. The list below details the staff structure of the site when it is operating at full capacity. The minimum staffing requirements when the site is operational are shown in bold italic font in brackets below.  
Attendance by the site manager is specified by EA/NRW guidance as a minimum of

20% of the site's operational hours.

| <u>Position</u>              | <u>No.</u>   | <u>Responsibilities</u>                         |
|------------------------------|--------------|-------------------------------------------------|
| Site Manager                 | 1            | Overall site management/ COTC holder            |
| Machine/plant operator       | 2 <b>(1)</b> | Operating loading plant/site supervision        |
| Office manager/administrator | 2 <b>(1)</b> | Managing site administration                    |
| General operatives           | 6 <b>(2)</b> | Sorting waste, maintenance, litter picking etc. |

Additional temporary staff will be employed on site during busy periods to carry out site maintenance works, plant maintenance, administration and record keeping.

- 1.7.2 The drivers and operatives will be trained to take samples of the waste for waste stream analysis, to be familiar with operational conditions and to observe potential breaches of permit conditions and understand the action to be taken.

## 1.8 Health and safety policy

- 1.8.1 All operations on site will be carried out in accordance with the relevant requirements of the Health and Safety at Work Act 1974 and company health and safety policy. Conditions of site use for employees, visitors and contractors are attached to this management system as Appendix IV. These conditions will be shown to all site users and must be signed prior to using the site. Anyone not complying with the conditions of use will be asked to leave the site.
- 1.8.2 Fire extinguishers will be kept on site to deal with fires as stated in the emergency procedures in Section 5. A first aid kit will also be kept on site and will be maintained to the standard required by the Health and Safety (First-Aid) Regulations 1981.
- 1.8.3 A summary copy of the company's health and safety policy is attached as Appendix IV, for information only.

## 1.9 Fit and proper persons

- 1.9.1 Technical competence - The site's Technically Competent Manager is Neil Hassall who has obtained his Continuing Competence Certificate from WAMITAB (Waste Management Industry Training and Advisory Board) in accordance with EA/NRW requirements (i.e. 4TMSH).
- 1.9.2 The site's Technically Competent Manager (and any additional Technically Competent Managers) are required to enter their time spent on site in the site diary. The required managerial cover is a percentage of the site's operational hours based on the site's OPRA score calculated by Natural Resources Wales (NRW). Any changes to the site management would be notified to NRW within 5 working days, naming the new manager providing the cover.

1.9.3 Financial provision – not applicable

1.9.4 Relevant convictions - at the date of application neither Neil Hassall, other officers or employees of Alan's Skip Hire (Wales) Limited had been convicted or formally cautioned in relation to a relevant offence.

## 1.10 Exempt activities

1.10.1 Activities which are outside the scope of the Environmental Permit for the site (listed in Schedule 3 of The Environmental Permitting (England and Wales) Regulations 2010) may be carried out at the recycling centre and the relevant details would be registered with the Natural Resources Wales prior to commencement. It is important to note that some of these activities may require appropriate planning permission for undertaking them.

1.10.2 Common exempt activities are listed below:

| <u>Exemption</u> | <u>Description</u>                                                                              |
|------------------|-------------------------------------------------------------------------------------------------|
| U4               | Burning wood / green waste as a fuel in a small appliance.                                      |
| T4               | Preparatory treatments (baling, sorting, shredding, etc.).                                      |
| T5               | Screening and blending of waste.                                                                |
| T6               | Treatment of waste wood and waste plant matter by chipping, shredding, cutting or pulverising.* |
| T8               | Mechanical treatment of end-of-life tyres                                                       |
| T9               | Recovery of scrap metal                                                                         |
| T11              | Repair or refurbishment of WEEE                                                                 |
| S1               | Storage of waste in secure containers                                                           |
| S2               | Storage of waste in a secure place                                                              |

\* (Proposal- processing of wood to be undertaken as a permitted activity rather than under a T6 waste exemption).

1.10.3 U4: Wood Burner - A wood burner with a net rated thermal input of <0.4 megawatts may be used to heat the buildings. No more than 50 kg may be burned over a period of one hour. If such plant is to be used it will be registered under U4 of Schedule 3 of The Environmental Permitting (England and Wales) Regulations 2010 prior to use.

1.10.4 T4: Processing of wastes - The preparatory treatment of wastes can be undertaken within the Environmental Permit for the site. The wastes must be source-segregated and delivered to the site as a homogenous consignment. The limits for baling, sorting, shredding, pulverising, densifying, crushing or compacting specified wastes under this exemption are listed below. Registration of this exemption would be under T4 or S2 of Schedule 3 of The Environmental Permitting (England and Wales) Regulations 2010:

| <u>Waste Types</u>              | <u>7-Day Treatment Limit</u>                          | <u>Storage Limit</u> |
|---------------------------------|-------------------------------------------------------|----------------------|
| <i>Cans and foils</i>           | <i>100 tonnes outdoors<br/>500 tonnes indoors</i>     | <i>500 tonnes</i>    |
| <i>Food &amp; drink cartons</i> | <i>100 tonnes outdoors<br/>3,000 tonnes indoors</i>   | <i>500 tonnes</i>    |
| <i>Glass</i>                    | <i>5,000 tonnes</i>                                   | <i>5,000 tonnes</i>  |
| <i>Paper &amp; cardboard</i>    | <i>500 tonnes outdoors<br/>3,000 tonnes indoors</i>   | <i>15,000 tonnes</i> |
| <i>Plastic</i>                  | <i>100 tonnes outdoors<br/>3,000 tonnes indoors</i>   | <i>500 tonnes</i>    |
| <i>Textiles and clothes</i>     | <i>1,000 tonnes outdoors<br/>3,000 tonnes indoors</i> | <i>1,000 tonnes</i>  |

- 1.10.5 T5: Screening and blending of waste - Treatment of specified wastes by screening and blending for the purposes of producing an aggregate or soil (and associated prior treatment). This allows a maximum of 5,000 tonnes of predominantly inert and soil-forming wastes to be treated over a 3 year period (50,000 for roadstone manufacture). These activities are exempt by virtue of Paragraph T5 of Schedule 3 of The Environmental Permitting (England and Wales) Regulations 2010.
- 1.10.6 T6: Treatment of waste wood and waste plant matter - Treatment of these wastes by chipping, shredding, cutting or pulverising it with a maximum 7-day processing limit of 500 tonnes. Registration of this exemption would be under T6 of Schedule 3 of The Environmental Permitting (England and Wales) Regulations 2010.
- 1.10.7 T8: Mechanical treatment of end-of-life tyres - This exemption allows the granulating, baling, peeling, shaving, shredding and re-treading of end-of-life tyres. The weekly limit for this process is 60 tonnes of truck tyres and 40 tonnes of any other tyres. No more than 10 tonnes of whole and processed tyres can be stored at the site at any one time under this exemption.
- 1.10.8 T9: Recovery of scrap metal - This exemption allows the sorting, grading, shearing by manual feed, baling, crushing or cutting it with hand held equipment. The annual treatment and storage must not exceed 1000 tonnes, cables must not exceed 50 tonnes. The waste is stored for no longer than 24 months, has sealed drainage and must not exceed a stack height of 5 metres.
- 1.10.9 T11: Repair or refurbishment of WEEE - This exemption covers the re-use of Waste Electrical and Electronic Equipment (WEEE), including that which are hazardous, for its original purpose or re-using any dismantled components for their original components. The annual treatment limit for this exemption is 1,000 tonnes. The waste should be stored to ensure its environmentally sound re-use and best available treatment, recovery and recycling techniques (BATRRRT) are used when treating it.

1.10.10 S1: Storage of waste in secure containers - This exemption allows the storage and bulking up of specific waste streams in secure containers pending recovery elsewhere. Waste can be stored for a maximum 12 months. It includes storage of up to 3 cubic metres of waste oils. You cannot store mixed wastes under this exemption.

1.10.11 S2: Storage of waste in a secure place - This exemption allows the storage of waste pending recovery elsewhere. In this case no more than 10 tonnes of batteries can be stored at any one time and must not be stored for a period of no longer than six months. Refer to S2 above.

1.10.12 Registration - once registered a copy of all exemption notifications and register entries will be held in the site office. Registered exemptions are valid for a period of 3 years. If the activity is to be carried on after 3 years, a renewal should be submitted to the EA.

## **2.0 SITE ENGINEERING AND INFRASTRUCTURE**

### **2.1 Access, parking and site roads**

- 2.1.1 Access to the site is gained from Redwither Road, as shown on Drawing Nos. 2399/426/03. The site entrance is shown on Drawing No. 2399/426/03.
- 2.1.2 Parking - sufficient parking space for 30 cars is available on site as shown on Drawing No. 2399/426/03.

### **2.2 Notice board and signs**

- 2.2.1 A notice board displaying the following information is positioned on posts behind the security fencing to the right of the site office:
- The permit holder/ site operator's name and address
  - Natural Resources Wales's local address and national/emergency telephone numbers
  - The site licence number
  - Opening hours
  - Emergency telephone number for the operator (Duty Manager)
- 2.2.2 Additional signs are displayed around the site for operational/health and safety purposes.

### **2.3 Site security**

- 2.3.1 Gates - The main entrance/exit gates are located as shown on Drawing No. 2399/426/03 and are of galvanised steel palisade frame construction to a height of 2 metres. The gates are padlocked at all times when the site is unmanned to prevent vehicular access.
- 2.3.2 Fencing - The western part of the site is surrounded by palisade fencing to the height of a minimum 2 metres and the eastern part of the site is surrounded by palisade fencing to the height of minimum 3 metres.
- 2.3.3 There is CCTV security on site.

### **2.4 Site office and service buildings**

- 2.4.1 The site office is located on site as shown on Drawing No. 2399/426/03. This office will be used for storage of relevant site documentation. Long term storage of documents may be transferred to the main office at Broughton Mill Road, Bretton.

Toilets, washing and kitchen facilities are also provided for staff on site.  
A telephone/facsimile for the recycling centre is available on site during working  
Hours

i.e.: Tel: 01978 663510      Fax: 01244 661652 (Bretton Office)

- 2.4.2 The table below details the relevant site documentation which is kept in the site office.

| <b>Documents to be retained in site office</b>                                                                |
|---------------------------------------------------------------------------------------------------------------|
| Environmental permit (original in safe )<br>copy held in weighbridge office                                   |
| the environmental management system (original in safe )<br>copy of agreed document held in weighbridge office |
| site diary (to record all inspections/visitors to the site)                                                   |
| Natural Resources Wales inspection forms                                                                      |
| all in-house inspection sheets/recording forms                                                                |
| duty of care transfer notes (for 2 years minimum)                                                             |
| hazardous waste consignment notes (if relevant)                                                               |
| waste delivery tickets                                                                                        |
| weighbridge tickets                                                                                           |
| accident book / RIDDOR notifications                                                                          |

- 2.4.3 The site office will be used to store field testing/sampling equipment which will be used on site to verify the composition of incoming loads i.e. Sample jars and chain of custody forms.

## 2.5 Wheel cleaning facilities

- 2.5.1 Procedures are in place to ensure that mud and debris are not tracked onto the industrial estate road and the public highway, which include the use of a mechanical/vacuum sweeper. A water hose/bowser will be provided on site to help limit dust and mud tracking off site by the vehicles.
- 2.5.2 The main vehicle running surfaces are all hard surfaced with concrete to reduce the likelihood of mud or debris being carried onto the public highway.

## 2.6 Fuel/chemical storage

- 2.6.1 Any fuel or chemical storage tanks and containers which are stored on site will be surrounded by a bund which is capable of containing a minimum of 110% of the volume of liquid stored in the tank. All pipework and associated infrastructure will be enclosed within the bund. A lock will be fitted to tank valves to prevent unauthorised operation. All valves and gauges on the bund will be constructed to prevent damage caused by frost. The tanks and containers will be clearly marked showing the product within and also their capacity.
- 2.6.2 All chemicals used on the site are securely stored in the workshop shown on Drawing ASH/03.

## 2.7 Waste transfer building

- 2.7.1 The waste transfer building consists of a constructed open fronted steel portal frame industrial building and has a ground supported concrete floor slab constructed to a minimum depth of 150 mm [concrete mix C40 (minimum 35% cement)]. The sub base for a slab consists of a 150 mm layer of compacted, crushed hardcore with a damp proof membrane installed (high density polyethylene sheet - 0.3 mm thickness).
- 2.7.2 The transfer building infrastructure will withstand the day to day tipping of loads, storage of waste and operating loading plant. Access and egress will be via an open front.
- 2.7.3 Newly concreted areas and repairs to the site surface will be surfaced with mesh/fibre reinforced concrete to a depth of 150 mm [concrete mix C40 (minimum 35% cement)].
- 2.7.4 The push wall in the waste reception area is reinforced with 8 - 10 mm steel plate to a height of 4.0 metres to protect the fabric of the building.
- 2.7.5 Area for the deposit of rejected wastes - a clearly labelled 6 cubic yard or similar enclosed skip will be provided for the deposit of rejected waste which cannot be removed from the site immediately. The location of this skip may be varied as operating conditions permit i.e. to permit loading of rejected wastes but it will be placed within the transfer building at the end of each working day.
- 2.7.6 The transfer building will house the MRF (materials recycling facility), which will consist of a trommel screen, overband magnet and a manned picking line with bays below.
- 2.7.6 The container for the fines will also be located within the transfer building.

## 2.8 Storage areas

2.8.1 Drawing No. 2399/426/03 the site layout plan shows the following storage areas:

- i. Waste reception area (mixed waste) - inside transfer building
- ii. External Storage bays (including designated bay for bulking up grit and screening) (for storage under permit and storage and processing under relevant waste exemptions.
- iii. Recyclable materials eg, baled cardboard
- iv. Inert storage and processing area.
- v. Wood processing area
- vi. Quarantine area

2.8.2 The surface of the site outside the transfer building consists of ground supported concrete slabs, constructed to a minimum depth of 150mm [concrete mix C40 (minimum 35% cement)]. The area used to store and process inert wastes is surfaced with hard core topped with small stone to create a level surface.

2.8.3 Minimum of six storage bays are being constructed along the northern boundary of the site as shown on Drawing No. 2399/426/03. The floor of the bays are constructed to a minimum depth of 150mm [concrete mix C40 (minimum 35% cement)]. The walls are constructed out of concrete lego blocks. The proposed height of the bays will be approx 4 metres and the depth of each bay being approx 3.5 metres. The floor falls to a 300mm acro drain and drains via an interceptor and piped along the back of the transfer building into the foul sewer system.

2.8.4 Inert waste may also be screened or crushed using mobile plant in the area shown on Drawing No. 2399/426/03.

2.8.5 It is the intention for the area used for the storage and processing of wood to be carried out on a concrete hardstanding to minimise contamination of the processed wood feedstock.

## 2.9 Drainage

2.9.1 The operator has recently commissioned an independent drainage consultancy to assess the existing drainage arrangements at the Wrexham site and to develop an improvement programme to help satisfy the pollution prevention requirements of the NRW which will ensure all water leaving the site is controlled. The results and recommendations will be concluded in a summary report. Therefore this section of the EMS is likely to be updated in 2015. In the meantime the current drainage systems are detailed below.

2.9.2 Surface water control –surface water drainage system has been designed to minimize contamination by run-off in areas where the risk of contamination is low. All surface water from impermeably surfaced areas of the top yard in front of the waste transfer building drain into a 300mm Acco drain which flows into an interceptor tank. The

tank egress flows into a settlement chamber prior to discharging into the Redwither Brook, as shown on drawing Nos 6544/1 & 6368/1. Surface waters arising from uncontaminated clean yard areas and roof water from the covered building is kept separate and discharges into the settlement chamber prior to discharge into the Redwither Brook as shown on Drawings Nos 6544/1 & 6368/1.

- 2.9.3 Discharge to controlled waters is permitted under a Consent to Discharge Trade Effluent (Consent Number CG0402201) issued and regulated by Natural Resources Wales.
- 2.9.4 Drainage from the new concreted area of the top yard ie to the south east of the transfer building drains to an acro drain and then flows via an interceptor to foul sewer as shown on Drawing No 2399/426/03.
- 2.9.5 All vehicle storage and maintenance areas in the bottom yard drain into a 300mm Acco drain which flows into a dedicated interceptor which discharges to foul sewer running adjacent to the Redwither Brook.
- 2.9.6 Any liquid arising in the waste processing building will be prevented from entering the surface water system by the location of the concrete push walls. Any non hazardous liquids arising within the building will be soaked up with sand or sawdust and then shovelled up for disposal with the general waste. If unknown or hazardous liquids are released onto the floor of the transfer building the spillage procedures detailed in Section 4 will be implemented.
- 2.9.7 The toilets and kitchen drain in the site office also drain to the foul sewer, as does the water from the weighbridge, after passing through a silt trap.

## 2.10 Vehicles, plant and equipment

- 2.10.1 Waste will be handled using a 360<sup>0</sup> excavator (grab) or wheeled loading shovel equipped with a bucket. The list below also includes other plant/equipment which may be in use at the site.

| <u>Type of plant/equipment</u>            | <u>No.</u> | <u>Function</u>                         |
|-------------------------------------------|------------|-----------------------------------------|
| Loading shovel                            | 1          | loading/unloading/movement/sorting      |
| 360 <sup>0</sup> excavator grab (317 CAT) | 1          | loading/unloading/movement/sorting      |
| 360 <sup>0</sup> excavator bucket         | 1          | loading/unloading/movement/sorting      |
| Trommel                                   | 1          | screening of inert waste                |
| Picking line/shed                         | 1          | sorting waste                           |
| Vibrating Screen (Powerscreen)            | 1          | Screening waste                         |
| Vacuum/road sweeper                       | 1          | sweeping site surface                   |
| Overband magnet                           | 1          | removal of ferrous metals               |
| Crusher (Parker Rockranger) *             | 1          | crushing of inert waste material (hire) |
| Wood shredder                             | 2          | shredding clean wood                    |

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|                                    |   |                                                                      |
|------------------------------------|---|----------------------------------------------------------------------|
| Over band magnets and eddy current |   | mechanical screening<br>removal of metals form the processed<br>wood |
| Shredder and baler                 | 2 | processing exempt wastes                                             |

\*Regulated under Part B authorisation issued by Local Authority

2.10.2 All plant will be stored on site and will only be operated by trained personnel.

### 2.11 Sampling and monitoring facilities

2.11.1 There is sufficient storage space on site for the storage of samples of waste taken from incoming loads for analysis. A sealed plastic container will be used for storage of the samples which will be stored in the workshop. Empty containers will be stored in the site office as mentioned in Paragraph 2.4.3 above.

### 2.12 Weighbridge

2.12.1 A weighbridge is provided on site to record incoming and outgoing loads. In the unlikely event the weighbridge is not available the weights of the loads will be calculated using the Environment Agency's/Natural Resources Wales agreed conversion factors.

## 3.0 SITE OPERATIONS

### 3.1 Preliminary procedures

- 3.1.1 Guidance is given by the site management to all employees, sub-contractors, other waste carriers and customers regarding the waste types which are acceptable at the site i.e. a copy of Appendix III of this document. The site is primarily used for the receipt of waste from Alan's Skip Hire (Wales) Limited's own operations and regular contract customers.
- 3.1.2 Where waste is brought in under sub-contract or is delivered by other hauliers then the carrier registration details will be taken for all new haulage operators bringing waste to the site and the details will be periodically checked with Natural Resources Wales to ensure that they are still registered. The procedures below are followed prior to the receipt of waste on site.
- 3.1.3 When a driver employed by Alan's Skip Hire (Wales) Limited arrives at the customers site to pick up a consignment of waste he will inspect the load for conformity with relevant regulations and safety procedures.
- i. If the load is satisfactory the driver will sign the relevant paperwork and remove the load from the customer's premises.
  - ii. If the waste does not meet the description stated on the controlled waste transfer note the customer will be advised to check the note and give a more detailed description of the waste.
  - iii. If the more detailed description of the waste reveals that the waste is not permitted at the transfer site then the customer will be advised to contact Natural Resources Wales to find an alternative site.
  - iv. The driver may also report back to the site manager for instructions.
  - v. Where it is suspected that the details given on the transfer note are incorrect the Natural Resources Wales may be contacted for advice.
  - vi. Where the load contains soil from an industrial site Natural Resources Wales may be contacted for advice to ensure that the load to be removed does not contain contaminated soil.

### 3.2 Checking in & inspection of loads

- 3.2.1 All incoming vehicles are required to report to site supervisor in the weighbridge office or loading plant operator upon arrival at the site. The details of the load will be recorded and the duty of care note/company documentation will be further checked by the supervisor/operator to ensure that the load is acceptable at the recycling centre. Any deviation from the procedures or problems with any loads will be reported to the site manager.

- 3.2.2 Any batteries that are received on site will be placed into dedicated lidded storage box constructed of suitable acid-proof material. These will be stored in the designated storage area.
- 3.2.4 Waste refrigeration equipment will be stored within the quarantine area. WEEE waste will be stored in designated storage containers.
- 3.2.5 Once a load has been accepted by the supervisor/operator the driver will be asked to un-sheet the vehicle (if it is sheeted) and a visual inspection of the contents will be carried out to ensure that the waste types comply with the environmental permit. The nature of mixed household, commercial and industrial waste makes full inspection difficult until the load is deposited. If unsuitable waste is discovered before deposit the load will not be tipped and will be rejected by the operator and returned to the producer. In cases where the unauthorised waste is likely to lead to a breach of permit conditions or where the rejected waste is special/ hazardous Natural Resources Wales will be contacted.
- 3.2.6 If the load is acceptable the driver will be instructed to deposit the load in the appropriate area. If the load is unacceptable after deposit it will be loaded back onto the delivery vehicle and returned to the producer.
- 3.2.7 Vehicles carrying loads must be weighed in on arrival and on exit if loaded to obtain a tare weight.

### 3.3 Waste deposit

- 3.3.1 Once a load has been accepted by the supervisor/operator the contents of the delivery vehicles will be discharged in the relevant stockpile/storage bay in accordance with the procedures outlined below.
- 3.3.2 Loads of suitable inert waste which do not require sorting will be deposited in the appropriate external stockpile. All mixed loads will be deposited in the waste reception area in the building.
- 3.3.3 Loads which are known to be inert or contain recyclable materials which do not require sorting will be deposited in the bays beneath the picking line or trommel.
- 3.3.4 **Grit and screenings:-** The material will be checked as per the waste acceptance procedures outlined in Section 3.4.8 of the environmental management system (EMS), and will then be directed to a designated storage bay/s located within the waste storage bay compound as shown on Drawing No 2399/426/03. The bay/s used to store the screening will be clearly labelled to prevent any other waste type being deposited. The bay has been selected as it is located as far away as possible from sensitive receptors and away from the prevailing winds. The bay has a concrete floor and drains to foul sewer as detailed above.

### **3.4 Waste treatment operations**

#### **Mixed wastes**

- 3.4.1 All mixed loads will be tipped in the waste reception area in the building and crudely sorted using the 360<sup>O</sup> (grab) or loading shovel which will deposit inert waste in the bays beneath the picking line or trommel for further sorting/recycling to produce a soil product and aggregates.
- 3.4.2 Mixed dry waste is sorted by hand and/or mechanical plant. Operatives will sort by hand recyclable waste such as cardboard, plastics, scrap metals, WEEE for recycling. Such waste is dropped into bays or bulk containers beneath the picking line. Card, paper and plastics are baled prior to storage pending dispatch for recycling.
- 3.4.3 The fraction of non-recyclable waste may be further processed mechanically through a screening system to remove any remaining inert material. The residue is then checked again to remove any recycle material that has been missed at the first picking stage. The residual waste will then be deposited in a container or large capacity artic trailer for transport to landfill or other authorised facility.
- 3.4.4 Waste which is not suitable for recycling is not picked and is fed into a compactor skip at the end of the picking line conveyor for removal off site.
- 3.4.5 Tyres which may be suitable for retreading will be stored in a skip in a container adjacent to the trommel.
- 3.4.6 Internal stockpiles within the transfer building will be limited to a maximum height of 7.0 metres, external stockpiles will be limited to 3 metres or the height of the boundary fence or as agreed with the local planning authority.

#### **Inert wastes**

- 3.4.7 A mobile crusher/screener may be hired in from time to time to process the inert waste stockpiled on site and produce hardcore and other aggregates derivatives in accordance with the WRAP recycled aggregates protocol.
- 3.4.8 External stockpiles of the above materials will be stored within the inert waste processing area marked on Drawing No. 2399/426/03.

#### **Bulking of Grit & screenings**

- 3.4.9 The site accepts compacted (dewatered) grit and screening on site for bulking up and then for forward movement off site for recovery at an authorised treatment facility.

The material will be disturbed as little as possible after it has been deposited and the retention time on site will be limited to help minimise odour. The bay/s and surrounding area will be subjected to good housekeeping and any spillages cleaned up promptly to also help reduce any odour potential.

The skip containing the grit and screening will be tipped into a designated bay where any excess moisture will be allowed to evaporate. The waste will be bulked up and no processing will take place on site. The walls of constructed of concrete 'lego' blocks which will be sealed to the floor of the bay to prevent any seepage escaping. The floor of the storage bay is made from reinforced concrete and drains via aco drain and piped to main sewer (as shown on Drawing No. 2399/426/03 Rev E).

### **Cardboard/Paper**

- 3.4.11 Cardboard and paper may be baled under the relevant registered T4 waste exemptions and plastics may be baled and/or shredded again under a relevant registered T4 waste exemption.

## **3.5 Waste/product storage**

- 3.5.1 The operational outputs and residues produced by the site and the disposal or recovery routes are detailed as follows:

- i Wood - forwarded to chipboard/mdf manufacturer via a third party.
- ii Paper and cardboard - delivered to a local paper mill
- iii Brick/rubble - for re-use or crushing to produce aggregate replacements.
- iv Fines - exported for use as landfill cover or as soil conditioning material for site restoration works.
- v Soils - exported for use as landfill cover or as soil conditioning material for site restoration works.
- vi Light waste (non-recyclable) - taken to lined non hazardous landfill site which is licensed to take all waste arising from the recycling centre.
- vii Other recyclates taken to authorised facility for recycling/reprocessing.

- 3.5.2 The names of the sites and hauliers used have not been listed because of commercial confidentiality but their details are available to Natural Resources staff on request.

### 3.6 Waste/product removal & export

- 3.6.1 Rejected wastes will be deposited in the quarantine skip. This will occur when non conforming waste is discovered after the deposit of a load and the producer of the load cannot be contacted (or identified) or where the removal off-site of the waste may cause further problems. Natural Resources Wales will then be contacted to agree a course of action where necessary. The contents of the skip will be recorded in the site diary and no wastes will be placed in the skip which are likely to react with other wastes.
- 3.6.2 When a collection vehicle arrives at the site the driver will be instructed to report to the site office or the loading shovel operator. All relevant documentation will be completed and the vehicle will be passed to pick up the load and take it to the designated recycler/disposal site. The product or waste will be loaded using the loading shovel.
- 3.6.3 The topsoil and hardcore storage areas will be used to store recovered materials until removal off site for re-use or for processing off site.

### 3.7 Sampling and analysis

- 3.7.1 Incoming wastes may be randomly sampled and submitted for analysis at the discretion of the site manager to verify the composition of a load. Contaminated soils are not permitted on site and the sampling procedure has been implemented to carry out spot checks to comply with the Duty of Care.

### 3.8 Record keeping

- 3.8.1 The details below will be recorded on a combination of the record keeping forms listed in Appendix II, invoices, weighbridge tickets, the site diary and controlled waste transfer notes (where required). The records will be kept in paper format.
- 3.8.2 The following details will be recorded for every load deposited at the site:
- (i) The date and time of delivery.
  - (ii) The name and address of the waste producer.
  - (iii) The detailed and accurate description of the waste including type, quantity (in tonnes or cubic metres) and EWC codes.
  - (iv) How the waste is contained eg loose, container type
  - (v) The carrier's name and address
  - (vi) Driver's name, signature and vehicle registration No.
  - (vii) Signature or initials of persons producing/accepting/inspecting/carrying the waste
  - (viii) Additional handling details/notes made by the driver after inspection of the load
  - (ix) SIC code of the premises which produced the waste
  - (x) Waste hierarchy declaration
  - (xi) Has the waste been previously treated eg manually or mechanically

3.8.3 The following details will be recorded for all deposits of non conforming waste at the site and will be forwarded to Natural Resources Wales, where required:

- (i) Date and time of deposit.
- (ii) A detailed and accurate description of the waste including type and EWC code.
- (iii) The quantity of waste (in tonnes or cubic metres).
- (iv) How the waste is contained eg loose, container type
- (v) Name, address and telephone No. of waste producer.
- (vi) The carrier's name, registration number and vehicle registration.
- (vii) Signature or initials of persons who produced, accepting/inspecting and carrying the waste
- (viii) Reason for the rejection of waste and action taken.

3.8.4 The following details will be recorded for every load of waste leaving the site:

- (i) The date and time of removal.
- (ii) Detailed and accurate description of the waste including type, quantity of waste (in tonnes or cubic metres) and EWC codes.
- (iii) How the waste is contained eg loose, container type
- (vi) The destination waste management site or exempt facility.
- (v) The name and registration No. of the carrier or employee removing the waste (if applicable) and vehicle registration No.
- (vi) Signature or initials of persons ie transferor, transferee and carrier of the waste
- (vii) SIC code of the premises transferring the waste
- (viii) Waste hierarchy declaration
- (ix) Type of treatment waste subjected to (if relevant) eg manual, mechanical

3.8.5 A summary of waste types and quantities deposited at and removed from the site will be forwarded to Natural Resources Wales at intervals specified in the environmental permit for the site.

3.8.6 The outcome of all inspections of waste types, hardstanding areas, push walls, drainage channels etc. will be recorded on site inspection form ASH/RF/4 and detailed comments will be entered into the site diary (including action taken or proposed).

3.8.7 Visitors to the site will be requested to sign the visitors book upon arrival and exit stating the purpose of their visit and who they represent.

### 3.9 Site diary, manual and visitors book

3.9.1 The site diary forms only part of the 'site manual', which is defined as the documentation system for the recycling centre operation i.e. all documents required by the environmental permit.

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The site manual includes the documentation listed in Section 2.4.2 above and is stored in the weighbridge office.

### **3.10 Wood Storage and Processing**

#### **3.10.1 Proposal to allow this activity to be carried out as part of the permitted operations.**

#### **3.10.2 Waste Wood Acceptance**

Clean wood is accepted at the Wrexham Recycling facility for processing in order to produce a recyclable product for use in the manufacturing industry and for use as a fuel. After initial acceptance and inspection for suitability, the wood is accepted and deposited on the main yard in the location as shown on Drawing No. 2399/426/03.

Waste wood is currently stored and processed under a T6 waste exemption registered with Natural Resources Wales. Large volume of wood could represent a significant fire risk to the site and to surrounding neighbours. The size of the site, planning controls, permit conditions and location of infrastructure dictate the amount of wood that can physically be stored on site. Therefore the amount of waste wood being restricted to a maximum 1000 tonnes of unprocessed wood and maximum 1000 tonnes of processed wood and 500 tonnes PAL waste. A Fire Prevention & Risk Plan has been provided for the site and a copy included as Appendix VIII to this document.

#### **3.10.3 Waste Wood Storage and Processing**

The area for waste wood storage is delineated on the Site Layout Plan (Drawing No. 2520/426/03) showing the locations of the waste activities carried out under both permit and exempt activities. Any change in location will be shown on subsequent revisions of the site layout drawing. The maximum storage height for stockpiles as governed by the current planning permission is 3 metres. With these constraints in place it is estimated that at a maximum of 1000 tonnes of unprocessed timber and a maximum 1500 tonnes of processed wood (which includes the PAL waste) can be stored on site within the permit boundary with sufficient fire break from site infrastructure and neighboring property. Waste wood acceptance will continue as long as storage capacity has not been reached.

Waste wood is processed using a loading shovel, 360 degree excavator, wood shredder and mechanical screening equipment. Waste wood is pushed by the loading shovel to the 360 degree excavator with grab attachment. The excavator then loads the wood shredder that reduces the raw timber to a 5mm to 80mm chip in an enclosed environment that has integral water suppression. From here, the chip is discharged to an enclosed hopper that feed an incline conveyor. The chip is then delivered to a shaker table where it is graded at 40mm and 10mm where overband magnets remove any ferrous metals. The 40 to 80mm chip is then further processed passing the wood chip over an eddy current to remove any non ferrous metals.

#### 3.10.4 Product Wood Storage & Loading

Product wood chip is stored in the designated storage area according to its grade. The maximum limits for chip storage are controlled by the size of the storage area and planning controls in force. When the chip reaches the outer extent of the storage area and a maximum height of 3 metres, chipping will cease until the product pile has been reduced or dispatched from site to the end user. Product chip is loaded on to curtain sided or ejector type articulated vehicles for dispatch. All vehicles are top loaded. Loading is undertaken by loading shovel or 360 degree excavator. Vehicles have their loads leveled, are fully sheeted and then dispatched from site via the weighbridge office with the appropriate paperwork.

#### 3.10.5 PAL Waste

Processed waste wood will also be accepted on site to be further refined by passing it over the eddy current separator to remove non ferrous metal. The refined wood chip is then returned back to the producer. This is referred to as PAL waste by the producer.

#### 3.10.6 Wood Processing Control Measures

The processing of wood can be in some circumstances or climatic conditions a dusty operation. As such, a number of controls have been implemented on the site to reduce the likelihood of dust generation giving rise to offsite nuisance whilst production and handling operations are being undertaken. A copy of the dust Management Plan which gives full details of the measures undertaken on site has been included in Appendix VII. This has taken on board the recommendations of the recent dust and PM<sub>10</sub> emissions monitoring survey carried out by Dustscan Ltd and will be revised following any additional data to include any further recommendations. A copy of the initial Dustscan Ltd report is included in Appendix VII. Two directional dust gauges have been installed off site and the findings will be included in a future report which will be circulated to NRW.

A dust suppression system has been installed on site to help minimise the effects of any dust emissions associated with site operations. The aerial water sprinkler system is routinely utilized throughout the year and includes any replacement or addition of units ensuring continued and effective water coverage.

Road sweeping of the yard on a daily basis is also implemented to ensure that the potential for dust migration is minimized.

Daily weather reports are currently reviewed for the site via the internet to determine indicated wind directions and intensities for the day. A physical inspection is undertaken by the site operators prior to commencement of operations. Three wind socks are located on site assists in this assessment. This assessment is recorded in the site diary. Periodic re-assessment is undertaken by the machine operator. If the wind intensity or direction alters, site management is informed and the assessment is repeated.

If it is apparent that operations are likely to cause dust to leave the confines of the site, or it is apparent that dust is leaving the site, wood processing operations will be suspended pending further evaluation. These assessments will be recorded in the site diary. The operator is currently looking into purchasing a weather station (possibly the Vantage Pro2 professional quality wireless weather station which displays and records barometric pressure, temperature, humidity, rainfall and wind).

A number of control measures have been designed into the production line to minimize the generation of dust and mitigate effects (also refer to Dust Management Plan). Drop heights from all discharge points will be kept to a minimum to prevent dust emissions. When the shedder/chipper are in operation the water suppression system must be in operation. These include as a minimum the fixed water sprays to the western boundary. There is also a mobile mist cannon which should be directed to the potential emission source and switched on to service any area of potential concern. The shaker table has been introduced to remove the <10mm fraction of the product that can cause airborne dust generation during loading so again appropriate dust suppression will be available when the table is operational.

The operator of the chipping process continually reviews these controls to ensure that they are fully functional and effective. If these controls fail or appear to be failing, operations will cease and site management will be informed. A re-assessment of the daily operations will be undertaken with the findings and actions taken recorded in the site diary.

In the event of a machine breakdown, a shut down at the end users premises or wood chip storage reaching capacity, un-processed wood may continue to be accepted until storage limits as detailed above in 1.10 above are reached. When storage limits are reached further deliveries of wood will cease until processing can recommence.

#### 3.10.7 Complaints Procedures

All complaints will be recorded on form RF/7 and will include a record of the complaint, particulars of the complaint and details of any actions taken to alleviate the problem.

## **4.0 ENVIRONMENTAL CONTROL, MONITORING AND REPORTING**

### **4.1 Breakdowns and spillages**

- 4.1.1 In the event of breakdown of the loading plant an alternative loading shovel/ 360 machine will be brought on site until it is repaired. If an alternative machine cannot be used then no further waste will be accepted until suitable plant is obtained. In the event of a breakdown of the screening plant (trommel), as it is a mobile unit it will be removed and replaced immediately with a suitable substitute unit until the original is repaired. Minor repairs on plant and machinery will be carried out on site with absorbents used to clear oil or fuel spillages. All other operations on site will continue as normal.
- 4.1.2 All site surfaces will be inspected daily when the site is in operation. Debris will be swept as required and placed in a skip. Regular inspections of the site surface, push walls etc will be carried out to enable contractors to carry out any necessary repairs.
- 4.1.3. Any spillages of fuel will be cleared immediately by depositing sand or absorbents on the affected area. The sand or absorbents will be placed in a skip to be taken to a suitably licensed site for disposal. All spillages of waste and windblown litter will be cleared by the end of the working day in which they occur. Spillage clearance procedures are detailed in Section 5.
- 4.1.4 All wastes liable to give rise to contamination will be removed from the site if the site is not secure or if operations cease or are temporarily suspended.

### **4.2 Site inspections and maintenance**

- 4.2.1 The inspection frequencies for maintenance/housekeeping are listed on record form ASH/RF/4. The inspection form will be completed by a person who is familiar with the requirements of the management system and permit for the site. All details of defects, problems and repairs carried out will be recorded on the form on the day that each event occurs. Detailed comments may also be recorded in the site diary. All repairs will be carried out within 5 working days.
- 4.2.2 All repairs to site security fencing will be made within 5 working days of the discovery of the damage and the site will be made secure until the repair has been effected.
- 4.2.3 Any major defects found during the daily site inspection which are likely to lead to a breach of permit conditions will be repaired by the end of the working day in which they are found where possible. If a repair is not possible by the end of the working day Natural Resources Wales will be contacted to agree a suitable timescale for repair.

- 4.2.4 All defects and problems likely to give rise to pollution will be recorded on the form ASH/RF/4 with repairs/solutions being carried out immediately.
- 4.2.5 Essential spares for plant maintenance will be kept in the store. If there is a risk that dust will be emitted following a malfunction or breakdown the plant will be shut down for repairs and the waste/stockpiles handled in accordance with the procedures outlined in Section 4.4 below.
- 4.2.6 All drainage gullies and silt traps will be inspected daily (visual inspection) to ensure that they are functioning effectively. Sediment levels in silt traps will be inspected every week and residues will be emptied as required.

### **4.3 Control of mud and debris**

- 4.3.1 Vehicles will be visually inspected before exit to check that loads are safe and that no mud is carried out on the wheels or body of the vehicle. Visual inspections of the site surface are carried out daily (see ASH/RF/4) and staff will report any problems with mud on the site surface immediately to the site manager.
- 4.3.2 The deposit of material on to Redwither Road will be treated as an emergency and will be cleared before the end of the working day by a vacuum/road sweeper. Silt will not be washed into roadside drains or gullies. The operator also owns a sweeper which will be used on site when necessary to ensure that hard surfaced areas of the site are free from mud and debris. The yard surface is all concreted.
- 4.3.3 A water hose is available to spray loads/stockpiles/site surfaces if excessive dust is being produced. All loads containing potentially loose material will be sheeted or sprayed with water prior to leaving the site to ensure that they comply with the requirements of the Duty of Care.

### **4.4 Dust monitoring and control**

- 4.4.1 Water Supply - A constant supply of mains water will be available for dust suppression in all climatic conditions. All external water pipes will be lagged to prevent frost damage during winter months.
- 4.4.2 All site operations will be carried out to minimise the creation of dust. An aerial water suppression system is provided on site as shown on Drawing No. 2399/426/03 with additional units added to ensure continued and effective water coverage over the external yard areas to reduce dust formation from both permitted and exempted waste activities.
- 4.4.3 A wind sock has been provided on site to enable the wind direction to be monitored closely and allow the necessary operational activities to be revised and the aerial dust suppression system to be implemented accordingly.

- 4.4.4 A mobile mist cannon or water hose will also be available on site to be used by the plant operator to spray the loading plant to reduce dust emissions if deemed necessary. The mist cannon or hose will be used in addition to the aerial water dust suppression system to spray the site roads, any dusty surfaces and stockpiled waste to prevent the formation of excessive dust. During dry conditions or when dealing with particularly dry wastes a bowser or vacuum tanker may also be used to spray the site surfaces to prevent the formation of excessive dust.
- 4.4.5 Sheeting of vehicles - Vehicles carrying potentially dusty loads off site will be securely sheeted before leaving the site. The company's hooklift and tipper vehicles are fitted with 'easy sheet' systems for added security and environmental protection.
- 4.4.6 Drop heights from all discharge points will be kept to a minimum to prevent dust emissions. Water will be sprayed on stockpiles of soils, wood waste/chip, inert waste and aggregates to reduce the creation of dust during dry periods. The trommel is enclosed to reduce dust creation.
- 4.4.7 A dust, fibres and particulate matter management plan (Emissions Management Plan) has been produced as part of the variation submission to cover the wood shredding and screening operations.

#### 4.5 Odour monitoring and control

- 4.5.1 The containment of mixed loads within the transfer building and the range of waste types accepted at the site present a low risk of odour nuisance. If malodorous waste is deposited on site which is likely to cause an odour nuisance it will be consigned to an enclosed quarantine skip and placed inside the building and removed from the site within 24 hours (this does not refer to grit and screening waste- see below).
- 4.5.2 **Grit and Screenings-**

There will be a planned inspection and maintenance regime in place. Sniff tests will be carried out round the site boundary by a trained operative when this additional waste type is being either deposited or removed from the storage compound bay. The waste will be carefully loaded and unloaded to ensure minimal risk of emissions. A record will be made of when the material is being imported or exported from the site and the results of the sniff tests recorded in the site diary.

There is a complaints procedure in place specifying how any complaints will be administered and progressed. Copy of the complaints recording form and procedure is included in Appendix II of the EMS. If odours from the grit and screenings compound are detected outside the site boundary the operator will evaluate the source and causes of the odour and if deemed necessary actions will be taken to either remove the offending material off site by the end of the working day or a temporary cover will be placed over the top of the storage bay.

Adequate controls will be in place to prevent emissions where possible but in any case to ensure that they are minimised and do not cause odour nuisance. The hierarchy for implementing control options is usually considered in the following order of preference before escalating to the next level:-

1. Site management and housekeeping
2. Operational and process changes
3. Containment
4. Enclosure with extract ventilation (not applicable)

#### 4.6 Litter monitoring and control

- 4.6.1 The most likely sources of litter on site are from the tipping of light loads. The bay walls and the building significantly reduce the effects of wind. Litter fencing 5 metres in height has been erected to the northern boundary of the site to reduce the potential for litter from the site escaping and will be extended behind the new storage bays to prevent litter escaping from the site. 'Goal post' litter nets are also available on site which can be re-located as wind direction changes to help trap litter when vehicles are being loaded.
- 4.6.2 Daily inspections will be carried out for the presence of windblown litter and operatives will be instructed to collect the litter, place it in a skip for disposal/recovery before the end of the working day.

#### 4.7 Pest and vermin monitoring and control

- 4.7.1 It is unlikely that vermin will present a problem because of the waste types handled at the site. The site will be inspected daily for the presence of vermin and the results of the inspection noted in the site diary or site inspection form. There is a regular contract in place with a pest control contractor and should the presence of vermin be detected then arrangements will be made with the contractor to provide appropriate remedies.

#### 4.8 Noise monitoring and control

- 4.8.1 It is not anticipated that site operations will be cause a noise nuisance or vibration problem because of the scale, location and plant type used on site of the operation. The Best Practicable Means (BPM) will be employed on site at all times to ensure that all plant and equipment does not produce excessive noise beyond the site boundary.

#### 4.9 Environmental monitoring and reporting

- 4.9.1 Surface water - no surface water monitoring is required at present.
- 4.9.2 Ground water - no groundwater monitoring is required at present.

- 4.9.3 Waste - loads containing soils may be sampled as described in Section 3.7 above. A copy of any analysis results will be kept in the site office and will be available for inspection by Natural Resources Wales staff.
- 4.9.4 Weather - weather conditions will be logged in the site diary if they are likely to lead to a breach of permit conditions.
- 4.9.5 Complaints - all complaints received and action taken in respect of those complaints will be recorded in the site diary or on record form ASH/RF/5.

## **5.0 EMERGENCY PROCEDURES**

### **5.1 General**

- 5.1.1 In addition to obligations imposed by RIDDOR '95 (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995) the operator will notify Natural Resources Wales of any serious injuries to employees of Alan Skip Hire (Wales) Limited, other site users or members of the public arising as a result of operations on site. Minor injuries such as cuts and grazes will be recorded in the accident book on site. Separate procedures will be used for different types of emergency. An emergency at the site is defined by the site management as follows:

“Any incident likely to result in harm to human health or pollution of the environment or serious breach of permit conditions and serious detriment to the amenities of the locality.”

- 5.1.2 For all emergency situations the deposit of any further waste will be suspended where necessary to allow action to be taken safely. If necessary staff and other users of the site will be evacuated to an area which is a safe distance away from the hazards. Staff handling the emergency will be provided with and trained to use the necessary PPE (personal protective equipment) unless the manager instructs them that the hazard is too severe and outside help is needed from the emergency services or specialist waste contractors.

### **5.2 Fire**

- 5.2.1 No waste will be burnt on site. In the event of a fire occurring on site the operator will exercise his judgement and extinguish the fire with a suitable fire extinguisher and/or call the fire service for assistance. Any fires will be reported to Natural Resources Wales on the working day that they occur and will be confirmed in writing by fax or letter within 3 working days. All persons will be evacuated from the site if necessary. Smoking is not permitted on site. Fire fighting residues will be disposed of to a licensed waste management facility. Further details are given in Fire Emergency/ Action Plan located in Appendix IV.

### **5.3 Spillages**

- 5.3.1 All fuel and chemical stores on site are bunded to contain any fuel leaks. If any spills occur a spill containment kit (absorbent pads, booms or granules) will be used to prevent further spillage and the contaminated absorbents placed in a skip for disposal to a suitably licensed landfill. Any hardstanding areas contaminated by a spillage will have the contaminated ground removed to a suitable licensed facility and replaced by clean uncontaminated materials.

## **5.4 Drums**

- 5.4.1 The deposit of drummed waste is not permitted at the site. If a drum is concealed within a load and is not observed until the load is emptied into the transfer area then the following procedures will apply:-
- i. The staff member will visually check the condition of the drum from a safe distance, noting any labels referring to the possible contents or hazards.
  - ii. The site manager will be contacted to verify the observations and to decide on further action.
  - iii. The producer of the waste and Natural Resources Wales will be contacted for advice and further information if necessary and both will be informed that a breach of the Duty of Care and site permit conditions has occurred as the result of the unauthorised deposit.
  - iv. No further waste will be deposited until the emergency has been dealt with.
  - v. All spillages will be cleared using a spill containment kit and all contaminated absorbents placed in a skip for disposal to a suitably authorised facility.
  - vi. If the deposit results in serious reactions with other waste or harmful emissions or the drum contents cannot be identified then the emergency services and/or specialist waste contractors brought in to assist. If necessary staff will be evacuated from the site or to a safe area within the site.

## **5.5 Adverse reactions**

- 5.5.1 No wastes are accepted which will react to present such a hazard. If unauthorised waste is found in a skip and does present such a hazard the same procedures as for the deposit of drums (above) shall apply.

## **5.6 High winds**

- 5.6.1 The transfer building provides sufficient containment to prevent light wastes from blowing off site in high winds. Vehicles leaving the site will be sheeted to comply with the requirements of the Duty of Care legislation.
- 5.6.2 Actions detailed in the Emissions management plan will be followed for the wood processing operations.

## **5.7 Poor visibility**

- 5.7.1 The site will not operate in conditions of poor visibility such as dense fog to reduce the risk of vehicle collision or other accidents.

## 5.8 Operational failure

- 5.8.1 The manager will be contacted in the event of any operational failure such as the breakdown of plant, systems or equipment and will decide whether operations are to continue or be suspended prior to corrective action being taken. Serious operational failures which result in the closure of the site will be recorded in the site diary.

## 5.9 Overturned vehicle

- 5.9.1 If a vehicle is overturned on the site or near the site entrance then no further waste will be accepted until the vehicle has been righted and any spillages have been cleared as described in Section 5.3.

## 5.10 Bomb Scare

- 5.10.1 In the unlikely event of a bomb scare the site will be evacuated and the police contacted. The police will then assume control of the site until the threat has been verified or the device defused and removed.

## **6.0 TRAINING FOR SITE STAFF**

### **6.1 Training needs assessment**

- 6.1.1 All new and existing site staff are subject to a specific training regime based on their responsibilities at the site to ensure all operations are carried out without harm to the environment or amenity of the surrounding area. Training in all aspects of the site and waste operations at the site with regard to the individual responsibilities of the site staff will help to prevent incidents occurring which may have an adverse impact of the environment and/or the employees and their coworkers.
- 6.1.2 The training needs assessment shown in form RF/6 in Appendix II of this document provides a comprehensive checklist for the training needs of all new site staff and also serves as a training review for existing site staff which will be carried out every 6 months.

### **6.2 Site rules and infrastructure training**

- 6.2.1 This will provide employees with a full understanding of the site's conditions of use and relevant documentation will be maintained and kept in the site office.
- 6.2.2 Competency should be demonstrated within this field to ensure the employee is fully aware of the site's surroundings and operations to ensure their safety and compliance with specific operating conditions at the site.

### **6.3 Emergency procedures training**

- 6.3.1 All employees will be required to be familiar with the Emergency Procedures as detailed in the Section 5.0 of the site's Environmental Management System (i.e. this document).
- 6.3.2 In addition to normal operating conditions as specified in the site rules, employees must also be trained in eventualities which may occur outside the scope of normal operating conditions so they are aware of how to deal with these eventualities in advance of an occurrence.

### **6.4 Fire safety / fire fighting training**

- 6.4.1 Management must provide all employees with appropriate fire safety training with regard to their individual responsibilities.
- 6.4.2 Emergency procedures detailing what measures employees should adopt should a fire occur at the site are detailed in Section 5.2 and will be covered by the "emergency procedures" training (see Section 6.3).

6.4.3 Regular fire drills will be undertaken by site management to ensure proper procedures are followed by employees in the unlikely event that a fire incident occurs. These will be unannounced drills and will not form part of the induction or review training as specified in for RF/6.

**6.5 Recognition of waste types training**

6.5.1 All employees will be given induction training and subsequent regular training to identify those waste types which are permitted for acceptance at the site under the site's Environmental Permit and those wastes which are not permitted. This will include specific training to identify wastes which are found in skips and are not permitted at the site including obscure wastes and how to handle these wastes safely. All employees will be advised that they should refer any unrecognisable or unknown wastes to senior management who should in turn contact Natural Resources Wales to agree a suitable method for removal.

6.5.2 This training will be provided to all site users who handle the wastes on site and those who are in charge of administration and reporting. In-depth training will also be provided to HGV drivers responsible for collecting the skips/containers from the site of production. They will be trained to identify any wastes which are not covered by the Environmental Permit for the site and inform the producer that an alternative facility must be sought for any non-compliant wastes.

**6.6 Storage areas / limits training**

6.6.1 Those employees who carry out their responsibilities at the site and those in senior posts must be trained to identify appropriate waste storage areas to ensure the waste storage operations comply with the requirements of the Environment Permit and Environmental Management System for the site.

6.6.2 Employees in these roles must also be trained to recognize storage limits to ensure that they are in accordance with those specified in Section 1.6.

**6.7 Vehicle / plant preventative maintenance training**

6.7.1 This training is provided specifically for the vehicle and plant operators in order to ensure that all plant and machinery is checked regularly to prevent any occurrences which may lead to impact on the environment.

6.7.2 Training will be in accordance with Section 2.10 of this Management System and will be based on the preventative maintenance schedule supplied by the plant/equipment manufacturer and the in-house maintenance schedule given on RF/20 in Appendix II.

6.7.3 The same training will be provided to senior management enabling a dual-level maintenance programme.

**6.8 Duty of care training**

- 6.8.1 All employees dealing with any consignments of waste will be trained in the completion of Duty of Care Waste Transfer Notes and the appropriate auditing of destination sites and/or contractors to ensure compliance.

**6.9 Plant operation training**

- 6.9.1 Any employees who are required to operate loading or treatment plant for the movement or processing of waste will be required to undertake the necessary qualifications for the operation of the specific item of plant in question. This will be required prior to operating the plant and will be obtained through necessary external certification programmes.

- 6.9.2 Regardless of general plant operation certification, all operatives will be fully inducted in the operation of the specific make and/or model of plant used at the site.

**6.10 Permit / management system training**

- 6.10.1 All employees will be inducted into the operating conditions as prescribed in the Environmental Permit and Management System for the site. Whilst much of the above training will provide specific guidance on many aspects of these documents, all employees will be made aware of the location of the Environmental Permit and Management System in the site office. All managerial positions will be made fully aware of the site's operating conditions as set out in both documents.

**6.11 Training for contractors**

- 6.11.1 General site training will be provided to any contractors who are working on the site on a temporary basis as described in Sections 6.2, 6.3 and 6.4 above.
- 6.11.2 Additional training will be provided to contractors in their area of expertise. If they are dealing with specific items of plant/machinery, site operating conditions and a general understanding of the Environmental Permit conditions will be provided to prevent any adverse impacts on the environment.