

# ENVIRONMENT MANAGEMENT SYSTEM

Environmental Management System			
Creation of new EMS	Bersham (Glenside) Ltd Bersham Colliery, Colliery Road, Bersham, Rhostyllen, LL14 4EG	AW	V1.2

Version	Comments	Author	Status	Date
1.0	Creation of EMS to support the Bespoke Environmental Permit Application	AW	<b>DRAFT</b>	01/09/2025
1.1	Not duly made comment added	AW	<b>DRAFT</b>	21/01/2026
1.2	Not duly made comment additional comments added	AW	<b>DRAFT</b>	18/03/2026
3.0	Issue of Bespoke Environmental Permit	AW		
4.0	At the point that the site is built and ready to operate	AW		

## Status of the EMS

The current status of the EMS is **DRAFT** as the environmental permit has not been issued and is active.

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## 1 INTRODUCTION

### 1.1 The Site

- 1.1.1 Bersham (Glenside) Ltd is a dedicated company for the recovery of colliery spoil.
- 1.1.2 The site is located at Bersham Colliery, Colliery Road, Bersham, Rhostyllen, LL14 4EG. The approximate national grid reference for the site is SJ 31322 48000.
- 1.1.3 The Colliery Lane site is situated close to adjacent to the former Bersham Tip and provides access to the former colliery.
- 1.1.4 The wash-plant will be located on part of the former colliery site. The area is currently used to store empty skips from a local waste management company and is home to an electricity distribution unit. Colliery lane still retains the former mine workings.
- 1.1.5 The proposed recycling process will be for the recovery of colliery wastes via an initial pre-crush, screening and washing via a dedicated wash plant. The recycling process is simple and will utilise established coal washing technology. The site will be using a wash plant utilising a Parnaby 8/36 Natural Medium Barrel washer.
- 1.1.6 The plant will have a capacity of 300 tonnes per hour. Washing 60 hours per week, providing a weekly processing capacity of 15,000 tonnes. This provides an annual capacity of 750,000 tonnes (based on a 50 week year).
- 1.1.7 The water clarification will be carried out via a by a Parnaby 9m thickener and 2x 3m belt presses. The wash plant will employ a 'closed loop' water treatment system, which will be topped up when required.
- 1.1.8 All washing will take place on an impermeable surface, forming part of a sealed drainage system.
- 1.1.9 The plant will recover valuable materials from colliery spoil.
- 1.1.10 The site will be operational

Mon – Fri	07:30 – 17:30
Sat –	08:00 – 13:00
Sun -	Closed

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1.1.11 The site has a number of receptors close by identified below

Ref	Receptor	Description	Direction from site boundary (m)	Approximate distance from Site Boundary (m)
1	Business Park	Mixed commercial sites	40	NE
2	Dwelling / farm	Plas Grono Farm	183	NE
3	Dwelling	Private Road	300	SW
4	Dwelling	Haford Road	645	SE
5	SSSI / SAC	Stryt Las a'r Hafod	830	SW
6	Dwelling	Corkscrew Lane	995	SW
7	Dwelling	Croesfoel Court	500	NW
8	Dwelling	Wrexham Road	665	SW
9	Dwelling	Wrexham Road	920	SW
10	Dwelling	Glan Yr Afon	320	N
11	School	Ysgol Rhostyllen	640	N
12	Sports Clubs	Football and Bowls	770	NW
13	Food and Drink	Public houses and takeaways	770	N
14	Hotel	Travelodge	755	NW
15	Food and Drink	Starbucks	440	NW

Receptors Plan



## 1.2 Environmental Management System

- 1.2.1 This **DRAFT** EMS is to support the application of a Bespoke Environmental Permit.
- 1.2.2 Currently there are no waste operations at the site and as a result building a functioning EMS is not possible hence this is only a **DRAFT** as until the site is built, tested and then commissioned a fully functioning EMS is not possible to create.
- 1.2.3 Further to this point it is not possible to have an externally approved and certified EMS for an operation that is not functioning.
- 1.2.4 The **DRAFT** Environmental Management System (EMS) is prepared in accordance with the Natural Resources Wales - How to comply with your environmental permit guidance.
- 1.2.5 The Site Manager will be responsible for day-to-day operations and ensuring compliance with the environmental permit and adhering to this EMS as well as relevant legislation.
- 1.2.6 The EMS will be reviewed annually unless there is an event that deems the EMS to be reviewed including a fire, complaints, change of management or changes in site infrastructure.
- 1.2.7 The EMS will be available to all staff in paper format within the site office. Staff will also be briefed on the EMS and the part they play in its fulfilment.
- 1.2.8 Electronic copies will also be held.

## 1.3 Environmental Permit

- 1.3.1 The company currently has no Environmental Permit and carries out no waste management activities at the site.
- 1.3.2 The EMS is supporting the application for a Bespoke Environmental Permit for the processing of colliery spoil wastes.

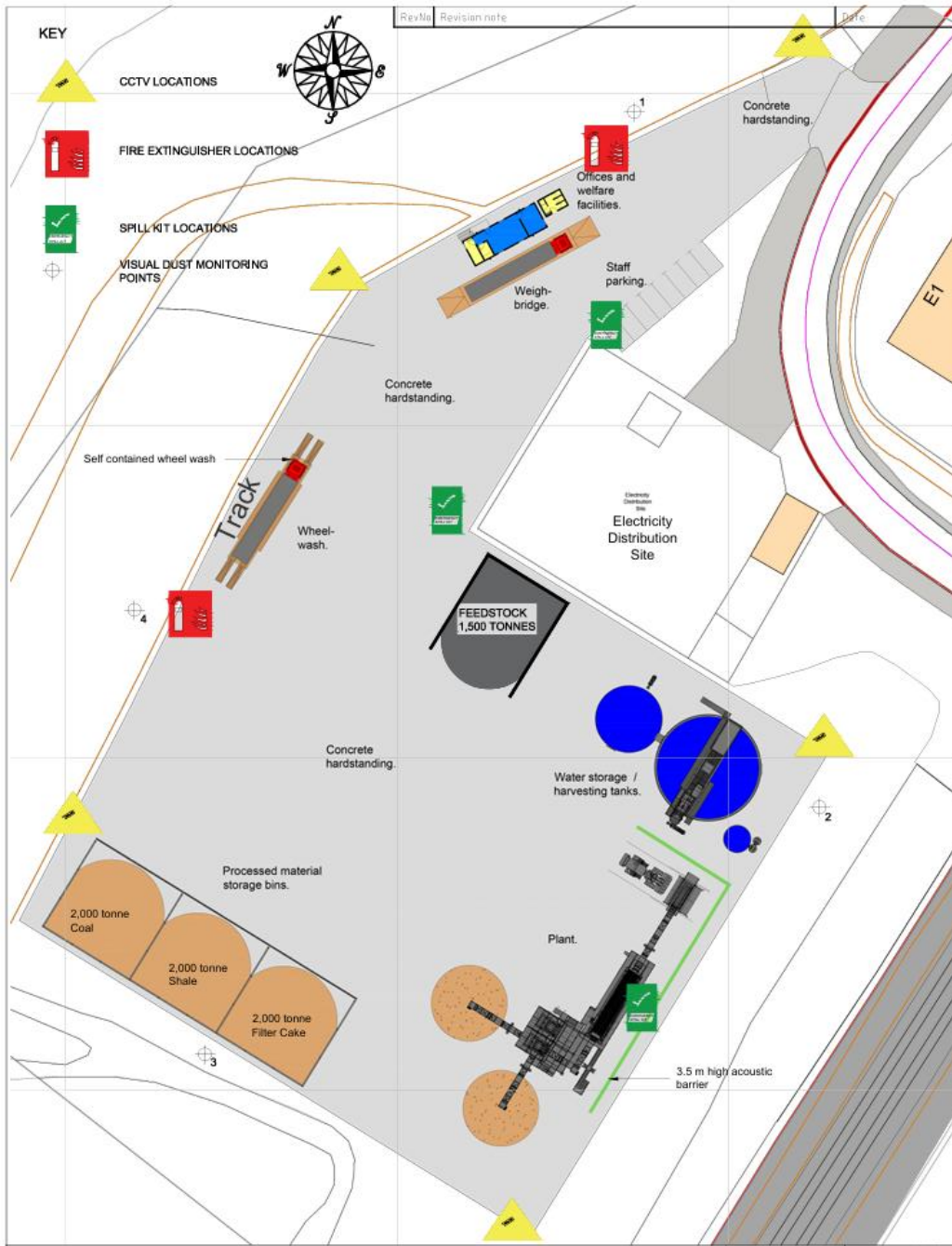
## 2 SITE INFRASTRUCTURE PLAN

### 2.1 Site Infrastructure Plan

2.1.1 The site layout plan below is a proposed site layout plan for the operation and includes:

- The site's main entrance from the public highway;
- Boundary and ground treatments;
- Buildings, structures and other and fixed plant on the site;
- Waste storage arrangements;
- Storage facilities for hazardous materials;
- Location of mobile plant storage and vehicle parking;
- Location of the spill kits and fire points; and
- Surface water drainage discharge point (via interceptors).

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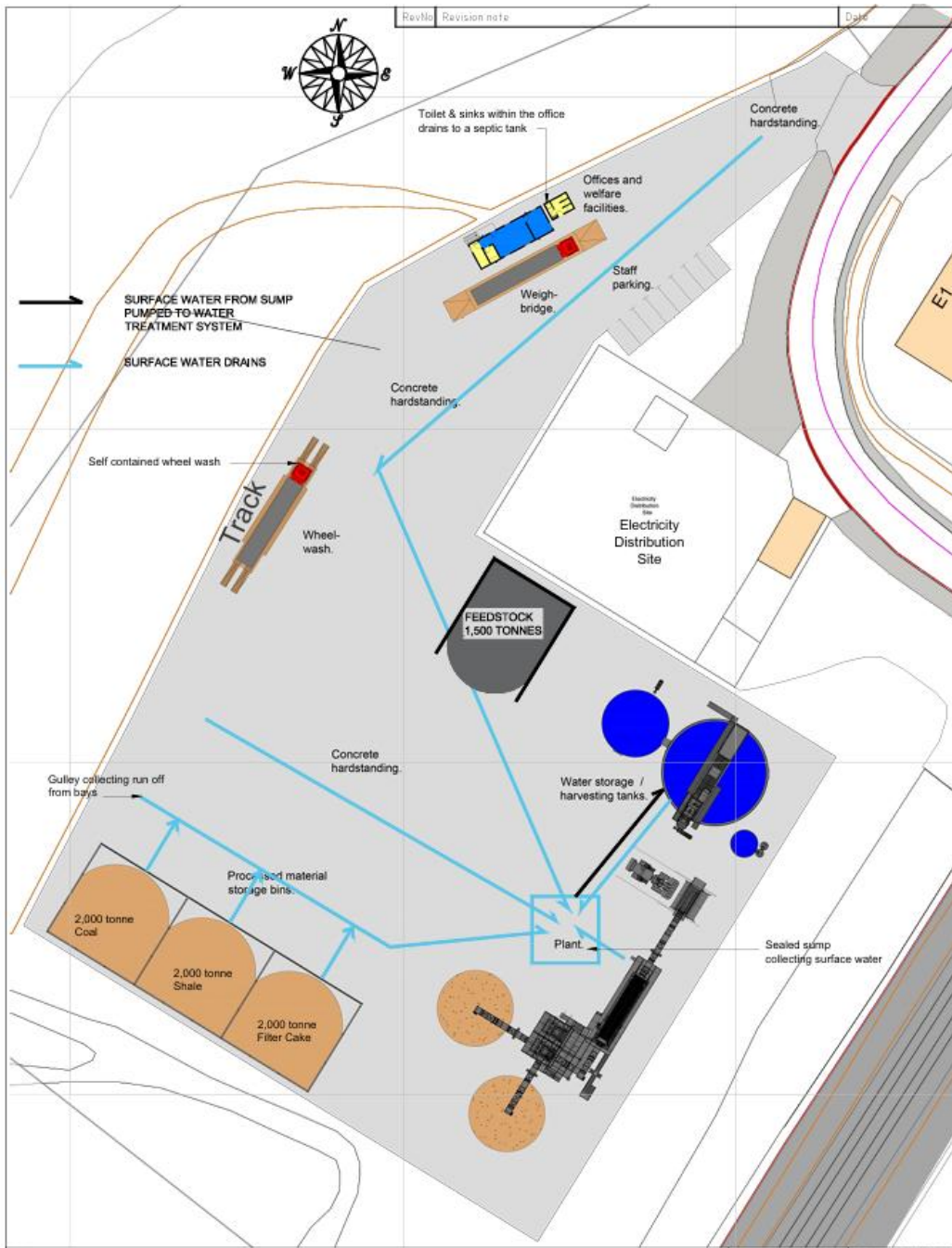


## 2.2 Drainage

- 2.2.1 A final site drainage plan will be provided once the sites infrastructure and engineering are completed and it is suggested that this will be an improvement condition within the permit.
- 2.2.2 Surface water is collected through a series of gulley's and sumps, and where possibly is collected to be re-used within the wash plant.
- 2.2.3 The wash plant sits on a sealed surface as part of a sealed drainage system.
- 2.2.4 Drains and gulleys are inspected on a weekly basis. This is to ensure the integrity of the drains and any blockages. This also involves viewing the contents of the interceptor for build-up of fuel and oils indicating it requires cleansing, this is recorded in the site diary.
- 2.2.5 The site interceptor is checked on a weekly basis by the site manager. If the interceptor or drains require cleansing a company will be engaged to complete these works. The company must be a licenced waste carrier and removed the waste to a suitable permitted waste management facility.
- 2.2.6 In the event of a spill of a fire, liquids will be captured and removed by tanker from site The company must be a licenced waste carrier and removed the waste to a suitable permitted waste management facility.
- 2.2.7 No surface waters are discharged from the site.

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## Site Drainage Plan



## 3 SITE OPERATIONS

### 3.1 Operations

#### Waste Acceptance

All waste that will be accepted at the site from the adjacent former Bersham Colliery tip. As a result, the waste origin and waste type will be consistent, but the below procedures will still be adhered to.

- All incoming waste must report to the site weighbridge.
- A completed waste transfer note must be provided to show the description and origin of the waste.
- The vehicle is then directed to the relevant area for tipping.
- Once tipped the waste is assessed against its description on the waste transfer note (consistent with the wastes from the colliery tip).
- If there is a variation in the waste compared to its description this must be discussed with the site office and the waste carrier.
- If the description requires changing this will be completed if it the waste can be accepted under the environmental permit.
- If not the waste will be reloaded and removed from site.
- If on further examination the waste is seen to be contaminated for example with asbestos the waste will be quarantined and dealt with accordingly by removing it from the site under the correct description and waste transfer note.
- Any rejected loads, quarantined loads or loads where the description has changed from the original waste transfer note will be noted in the site diary.
- Where a load is assessed to be possible hazardous this will await assessment. For example, if a waste stream arrives as a non-hazardous waste stream, but on closer examination is assessed to be hazardous the relevant mirror code will be assigned and the waste removed from site to a suitable permitted waste facility.
- If this is the case the relevant mirror code will be assigned in line with waste description guidance.

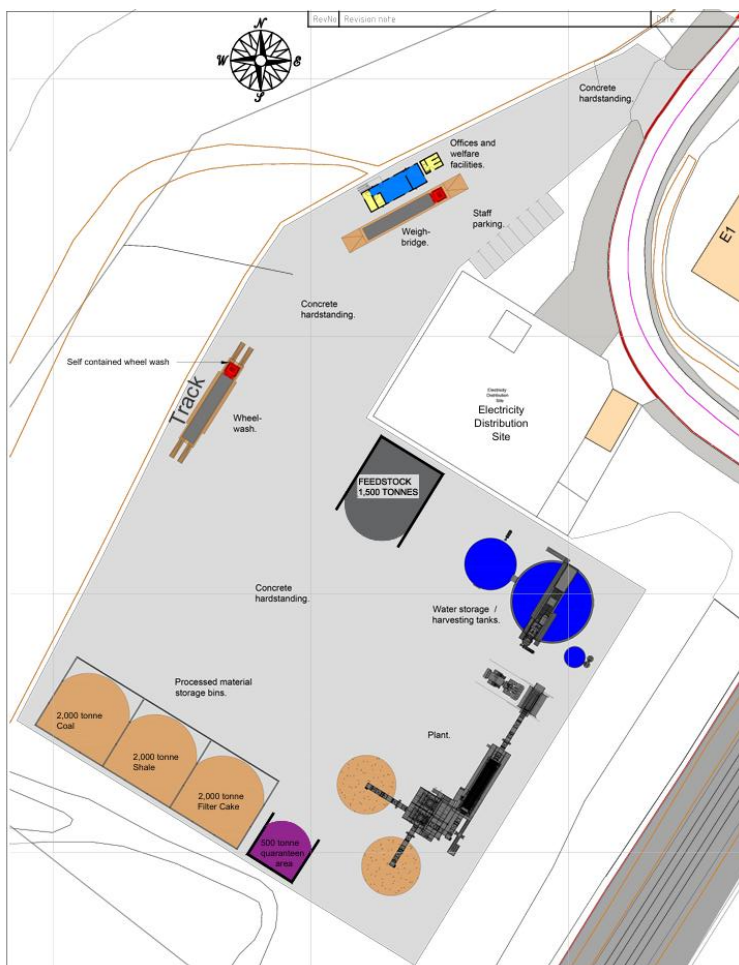
## Waste Transfer

All incoming waste will be provided with a digital waste transfer note;

- The note will be issued by the weighbridge and notes will comply with Natural Resources Wales waste transfer notes guidance. Waste transfer notes will include the time of arrival at site and the SIC code of the waste producer.
- If the waste is deemed hazardous a hazardous waste consignment note will be issued.
- Due to all wastes coming from the same source a physical waste transfer note will not be issued and a 'season ticket' will be maintained.

## 3.2 Waste Storage Plan

The Waste Storage Plan for the site is simple with wastes arriving at the site from the colliery being stored in waste bays awaiting processing. These are shown in on the waste storage plan.



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### Waste Storage Table

Waste Type	EWC Code	Max. Storage Time	Max. Storage Volume	Form	Storage Method	Max. Height
Colliery Spoil	01 01 02	1 month	1,500	Lose	Stockpile	5m
Coal	19 12 12	1 month	2,000	Lose	Bay	5m
Filter cake	19 02 06	1 month	2,000	Lose	Bay	5m
Shale / aggregates	19 12 12	1 month	2,000	Lose	Bay	5m

### Controlling storage time

- 3.2.1 Storage time of waste will be monitored via record keeping of incoming and outgoing wastes. If a waste type is on site and nearing its maximum storage time, it will be transported off site despite not being a full load.
- 3.2.2 All associated records are stored within the site office.
- 3.2.3 Any waste that is storage in stockpiles will leave the site on a first in, first out basis.
- 3.2.4 The bays provide an indication of the volume of waste on site.
- 3.2.5 Processed wastes will again be stored in bays and will again leave site in a first processed, first out process.

### Separating waste types

- 3.2.6 All colliery spoil waste to be processed come from the same colliery tip, as a result the wastes does not need to be separated.
- 3.2.7 However, if any of the colliery spoil is not conforming it will be separated and quarantined.
- 3.2.8 Washed spoil will be separated into fractions via the wash plant and these will be stored in separate bays.

### Controlling waste types

- 3.2.9 Visually checking incoming waste will ensure that only permitted waste types are accepted at the site. Any waste that is not permitted will be rejected. Should any non-permitted waste be inadvertently bought to site, as soon as this is identified it will be separated from other waste, and stored appropriately until it can be removed from site and taken to a suitably licenced facility as early as practicable. This will be recorded in the site diary.
- 3.2.10 The site diary is located and stored within the site office.

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## 3.3 Fire Prevention Plan

- 3.3.1 The site does not accept any flammable wastes on the site. As a result, there is no requirement for a Fire Prevention Plan.
- 3.3.2 There are fire extinguishers on site for use on mobile plant (which are fitted with their own fire extinguishers) and for use within the site office.

## 3.4 Site specific processes, activities or operations

- 3.4.1 The sites proposed site specific operations and activities are associated with Bersham (Glenside) Ltd will only treat waste that is generated from the removal of waste from the historic colliery tip on site.
- 3.4.2 The company will then provide a premium washed 'secondary' aggregates back into the construction sector and along with recovered coal

## 3.5 Emissions and discharges

- 3.5.1 There will be no point source discharges to land, air, water or the foul sewer.
- 3.5.2 As a result, there will be no fixed emission limits or monitoring points.
- 3.5.3 If noise is considered to be considered an issue a dedicated Noise Management Plan will be created after a noise impact assessment has been approved by Natural Resources Wales.
- 3.5.4 Dust will be managed via a Dust Management Plan.

## 3.6 Site engineering and infrastructure

- 3.6.1 The sites infrastructure will be inspected and managed to prevent deterioration.
- 3.6.2 Planned maintenance will be employed to prevent degradation.

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3.6.3 All damage or wear will be recorded and fixed.

3.6.4 The site managed will be responsible these actions.

### 3.7 Permitted activities review

3.7.1 Once the Environmental Permit is issued the operations will be assessed daily against the permit.

3.7.2 Daily checks will include and will not be limited to –

- Waste types
- Waste storage
- Waste treatment
- Infrastructure
- Drainage
- Noise
- Dust
- Noise
- Odour
- Pests

3.7.3 In the event that a non-conformance against the permit is identified it will be noted in the site diary and reported to the site manager.

3.7.4 The site manger will rectify the non-conformance and noting Natural Resources Wales.

3.7.5 If site activities can no longer comply with the environmental permit the permit will have to be varied.

## 4 SITE AND EQUIPMENT MANAGEMENT

### 4.1 Equipment

4.1.1 An inventory of all equipment, machinery and vehicles will be retained by the site manager and is located in the site office and daily visual checks will be undertaken and where necessary logged in the book

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relating to each individual. Equipment, machinery and vehicles will be serviced and maintained in accordance with the manufacturer's recommendations.

- 4.1.2 All repairs to equipment, machinery, vehicles, will be undertaken within 7 days of detection. Records of checks, service and maintenance report forms will be kept in the site office.
- 4.1.3 All buildings and infrastructure will be inspected weekly by the site manager. Necessary repairs will be carried out as soon as practicable and details of repairs will be recorded in the site diary.
- 4.1.4 The site has a store off consumables for the maintenance of the wash-plant and associated mobile plant.
- 4.1.5 Common spare parts are also stored on site to aid with any repairs to the wash plant to prevent down time
- 4.1.6 Down time will be recorded within the site diary.
- 4.1.7 The company once the site is built will liaise with manufacturer of the wash-plant and the loading shovels to produce a Planned Preventative Maintenance system.

## 4.2 Site Security

- 4.2.1 When built the site will be fully secured by a 2.4m palisade fence along its entire perimeter. The Site will also benefit from lockable 2.4m palisade gates.
- 4.2.2 The site will also have an extensive CCTV system that covers the whole operation to aid with the prevention of break ins and vandalism.
- 4.2.3 The CCTV system will have the following features –
  - Night vision
  - Motion detection
  - Record to a hard drive
  - Viewable from laptops and mobile devices

## 5 CONTINGUENCY PLANS

### 5.1 Waste Storage Quantity and Monitoring

- 5.1.1 External factors may impact upon the storage and management of waste on site.
- 5.1.2 As the waste accepted and treated at the site is from the adjoining colliery any breakdowns or adverse weather conditions impacting on waste acceptance and processing does not impact on customer.
- 5.1.3 Waste would not be delivered to the site until the site was capable of accepting it.
- 5.1.4 Stockpile heights and volumes are visually checked through the working day by site supervisors and staff working in this area, and if they reach their limits the adjoining permitted site will be used for additional storage.
- 5.1.5 If there was no suitable waste storage on either permitted site, waste would either not be allowed to enter the permitted area.
- 5.1.6 Any reasons for waste not being accepted would be noted in the site diary.

### 5.2 Waste Storage Duration and Monitoring

- 5.2.1 Due to the nature of the site's operations, i.e. the scale of waste it deals with and speed this waste enters and leaves the site, it is extremely unlikely waste will exceed the maximum storage durations set out on the table above.
- 5.2.2 In the event of a potential permit breach the local Environment Officer at the Natural Resources Wales would be contacted.
- 5.2.3 In the event of a breakdown to the wash-plant there may be a backlog in the processing of the waste. During this time stockpiles will be closely monitored.

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## 5.3 Waste storage drainage infrastructure

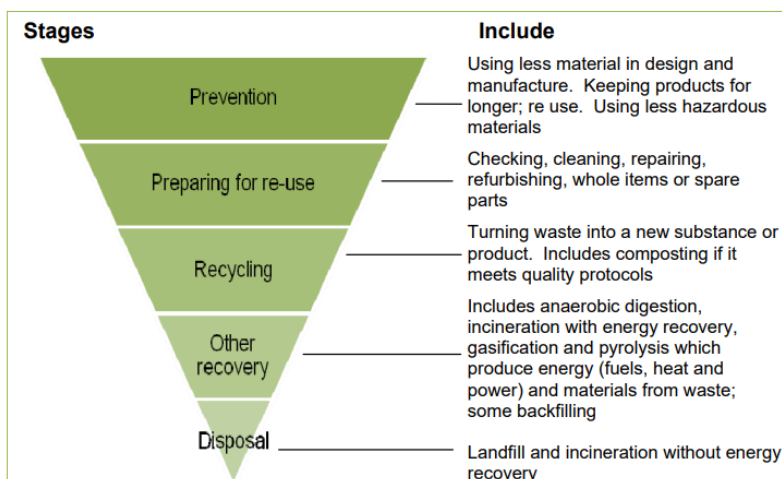
- 5.3.1 All waste storage, transfer and treatment will take place on an impermeable concrete pad forming part of a sealed drainage system.
- 5.3.2 Waste bays will be formed from concrete lego style blocks to provide flexibility.
- 5.3.3 All surface water drains to a central sump for collection and re-use within the wash-plant.

## 5.4 Transportation and distribution

- 5.4.1 All loads coming to the site will be in dumper trucks direct from the adjacent former Bersham Colliery tip.
- 5.4.2 Once the colliery spoil has been recycled in the washing process the resulting materials will leave the site via sheeted HGV's on the road network.

## 5.5 Waste Hierarchy

- 5.5.1 The company will apply the waste hierarchy to the proposed operation.
- 5.5.2 The colliery spoil in its current form has been disposed off
- 5.5.3 The recycling of this waste stream into different useable materials is a substantial improvement on the wastes existing state.



## 5.6 Fire Action Plan

5.6.1 As the site does not accept waste that is flammable a dedicated Fire Prevention Plan is not required, but the following would take place for any other fires at the site.

5.6.2 In the event of a fire the following fire actions will be taken:

5.6.3 Upon discovering a fire staff must:

- Call the Fire and Rescue Service IMMEDIATELY using 999 and report the location of the fire.
- Prevent vehicle movements into and out of the site until the incident has been brought under control.
- Clear the area in the vicinity of the site personnel.
- Only after the above actions have been taken should staff then try to extinguish the fire themselves using the on-site firefighting equipment, ensuring that their own safety is paramount.
- Record all incidents in the site diary and insurance and accident records completed as appropriate.
- All incidents to be notified to the Natural Resources Wales by telephoning the Area Office or Emergency out of hours' telephone number within 24 hours.
- All incidents will be notified to the Natural Resources Wales using the notification form in Schedule 5 to the environmental permit.

5.6.4 Fire of equipment or machinery or vehicles:

- Switch off the ignition.
- Call the Fire and Rescue Service IMMEDIATELY using 999 and report the location of the fire.
- Clear the area in the vicinity of the site personnel.
- Only after the above actions have been taken should staff then try to extinguish the fire themselves using the on-site firefighting equipment, ensuring that their own safety is paramount.
- Record all incidents in the site diary and insurance and accident records completed as appropriate.
- All incidents to be notified to Natural Resources Wales by telephoning the Area Office or Emergency out of hours' telephone number within 24 hours.
- All incidents will be notified to Natural Resources Wales using the notification form in Schedule 5 to the environmental permit.

5.6.5 Staff training:

- All existing staff will be trained to use the firefighting equipment.

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- The site's Fire Prevention Plan will be implemented and all new and existing employees will be briefed on this.
- All new staff will be trained within 2 months from commencing employment.

## 5.7 Flood Action Plan

5.7.1 According to the EA's 'Flood Map for Planning', the site is not located in Flood Zone.

5.7.2 The operator has signed up for Floodline, which provide free flood warning by phoning 0345 988 1188.

5.7.3 In the event of a flood the following actions will be taken:

- Flooding potential will be monitored by flood alerts in the local press or from the Inspecting Officer of Natural Resources Wales.
- Material stored in stockpiles can be moved into containers where practicable, and moved to higher ground.
- Staff will be communicated with regarding travel to and from work in times of flooding and informed not to enter the flood water.
- Records of flooding will be retained by the site manager and will include details on location of the flood water on site including photographs and annotated maps.
- Details of actions taken with regard to this flood action plan will be recorded in the site diary.



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### 5.7.4 Staff training:

- All existing staff will be trained in flood awareness and these procedures.
- All new staff will be trained within 2 months from commencing employment.

5.4.5 In the event of a localised flood there may be localised power outages that may mean the site is unable to operate. If this is the case the site would be closed. In addition, flooding to local roads may also mean the site has to shut.

## 5.8 Failure of Essential Equipment and Machinery

### 5.8.1 In the event of breakdown of any essential equipment or machinery:

- Report the failure to the site manager as soon as possible.
- Trained personnel to attempt on-site repair.
- Call technician to repair machinery or equipment as soon as possible.
- Make arrangements for alternative machinery to be hired as necessary.
- While essential equipment is out of use ensure incoming waste is minimised to avoid a backlog of stockpiled waste.
- Record all actions in the site diary (notification of breakdown, contact with technician, estimated downtime, precautions taken, when repairs have been made).
- Notification to be made to Natural Resources Wales using the Schedule 5 notification form in the environmental permit.

### 5.8.2 Staff training:

- All existing staff will be trained in this procedure.
- Key staff will be trained to undertake basic maintenance and repairs on essential equipment.
- All new staff will be trained within 2 months from commencing employment.

## 5.9 Severe Weather

5.9.1 In the event of severe weather conditions including dry weather and windy conditions dust may become an issue.

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- 5.9.2 Dry stockpiles, i.e. soils, will be dampened, and following evaluation of the severity of the conditions stockpile heights could be reduced.
- 5.9.3 Movement of dry material will be avoided during these conditions.
- 5.9.4 In the event of extreme cold there is the potential for the wash plant to freeze.
- 5.9.5 Staff training:
- All existing staff will be trained in this procedure.
  - All new staff will be trained within 2 months from commencing employment.

### 5.10 Dust

**NOTE: The company will manage the site in line with a Dust and Emissions Management Plan**

- 5.10.1 In the event of dry weather both stockpiles of waste likely to give rise to dust and surfaces that may produce dust will be damped down at regular intervals to prevent dust.
- 5.10.2 The sites surface is made of concrete which is easy to clean and removed dust and debris from.
- 5.10.3 A water bowser is available to allow site surfaces to be damped down in dry weather.
- 5.10.4 Hand hoses can also be used to dampen down roads and stockpiles.
- 5.10.5 In the event of excessive dust on road surfaces a mechanical road sweeper will be hired in.
- 5.10.6 Good housekeeping is essential and an individual is tasked with removing loose litter and debris for the site on a daily basis.
- 5.10.7 The sites mechanical road sweeper will be deployed on a daily basis.
- 5.10.8 In high winds activities that could spread dust and particulates are ceased this included loading and unloading waste from vehicles potentially dusty wastes.
- 5.10.9 Where possible vehicles that are covered or are enclosed are used to transport waste to and from the site.

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- 5.10.10 In the event of any complaints the complaints procedure will be followed and the complaint investigated. The companies form in Appendix 1 will be completed.
- 5.10.11 All mobile plant, equipment and generator will run on diesel. These vehicles will be fitted with diesel particulate filters.
- 5.10.12 All vehicles are inspected and maintained inline with manufacturers guidelines to ensure that they run efficiently and correctly.
- 5.10.13 All mobile plant, equipment and generator will be of the latest EURO 6 standard to ensure emissions from exhausts are as low as possible.
- 5.10.14 The mobile plant, equipment and generator will run on diesel. The means there is the ability to have exposure to Volatile Organic Compounds from fuelling.
- 5.10.15 Fuel will be delivered to the site in bulk and stored. This process will be involved coupling a tanker to the fuel tank. There will be no exposure of VOCS's to the air.
- 5.10.16 Fuelling of mobile plant, equipment and generator will be carried out when required with diesel tanks open for as short a period as possible.
- 5.10.17 Any leaks will be fixed immediately. All spills will be cleaned up immediately.

### 5.11 Litter

- 5.8.1 Good housekeeping is essential and an individual is tasked with removing loose litter and debris for the site on a daily basis.
- 5.11.2 In the event of litter escaping the site a daily litter pick is carried out by the dedicated yard man.
- 5.8.3 In high winds activities that could spread dust and particulates are ceased this included loading and unloading waste from vehicles potentially dusty wastes.
- 5.8.4 In the event of any complaints the complaints procedure will be followed and the complaint investigated. The companies form in Appendix 1 will be completed.
- 5.11.5 All incoming and exporting waste vehicles will be covered.

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- 5.11.6 The site shall be inspected daily by the site manager and any litter or accumulated debris shall be dealt with immediately.
- 5.11.7 Events that have led to excessive dust releases and activities and as a result activities have ceased will be noted in the site diary.
- 5.11.8 Any complaints will be actioned in accordance with the site complaints procedure and recorded in the site diary

### 5.12 Noise

- 5.12.1 All staff are trained to prevent reduce the impacts of site activities creating noise.
- 5.12.2 Where possible the drop heights of waste will be kept to a minimum.
- 5.12.3 Vehicles and mobile plant will switch their engines off when not use to prevent unnecessary noise.
- 5.12.4 In the event of any complaints the complaints procedure will be followed and the complaint investigated. The complaints form in Appendix 1 will be completed.
- 5.11.5 Large noise events will be noted in the site diary.
- 5.11.6 The noise barrier built around the Parnaby screener will be in place before the any screening takes place. The barrier will be inspected and maintained.

### 5.13 Debris on the road

- 5.13.1 All site internal roads will be kept free from debris.
- 5.13.2 In the event of excessive debris on road surfaces a mechanical road sweeper will be deployed.
- 5.13.3 If the debris are likely to give rise to dust the surfaces will be dampened down.
- 5.13.4 If excessive amounts of debris have been identified on the road the details will be noted in the site diary.

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5.13.5 In the event of any complaints the complaints procedure will be followed and the complaint investigated. The complaints form in Appendix 1 will be completed.

### **5.14 Pests**

5.14.1 The company employs a contractor to provide and maintain baited vermin traps.

5.14.2 In the event of any complaints the complaints procedure will be followed and the complaint investigated.

### **5.15 Odour**

5.15.1 The site does not accept any odorous wastes.

# ENVIRONMENT MANAGEMENT SYSTEM

## 6 ACCIDENT PREVENTION AND MANAGEMENT PLAN

POSSIBLE ACCIDENT / INCIDENT	WHAT WOULD THE HARM BE?	HOW DO WE REDUCE THE CHANCES OF IT HAPPENING?	WHAT TO DO IF IT HAPPENS
<b>SPILLAGES</b>			
Spillage of contaminated products during delivery of non-conforming waste.	Contamination of land, groundwater and watercourses.	The drainage system will be regularly inspected and any repairs will be carried out as soon as they have been identified.	Spill Kit – follow manufactures instructions  Temporarily direct surface water to containment tank instead of discharge/
<b>FAILURE OF OR ACCIDENT TO PLANT OR EQUIPMENT</b>			
Fuel leak.	Contamination of land, groundwater and watercourses.	Daily visual inspection Preventative maintenance regime. Following an accident, visual inspection.	Spill Kit – follow manufactures instructions
<b>FAILURE OF SERVICES and EQUIPMENT, MACHINERY, VEHICLES</b>			
Due to failure of supply; water, electricity, due to utility supply being struck and broken / cut.  Broken down machinery (wash plant )	Processing would stop, leading to backlog of material stockpiled  Processing would stop, leading to a backlog of material stockpiled	Supply interruption usually off-site, so difficult to reduce risk of its occurrence.  Ensure equipment, machinery and vehicles are regularly serviced and maintained to minimise risk of them breaking down	Use backup generator or temporarily cease to accept waste. Bring in water in a tank  Have details of an appropriate engineer to call to make repairs, keep supply of stock items for repairs.  Hire machinery if appropriate.  Temporarily cease to accept waste until machinery is up and running.
<b>FAILURE OF CONTAINMENT</b>			
Failure of containment facilities.	Contamination of land, groundwater and watercourses.	Daily visual inspection Preventative maintenance regime.	Repair as soon as practicable. Test water to identify contamination and remediate as necessary.
<b>VANDALISM</b>			
Unauthorised entry and tampering or malicious damage to property, plant and equipment.	Contamination of land, groundwater and watercourses.	Secure gate. Site locked when un-manned. Site notice board has details of who to contact in an emergency.	Repair site security; Review security.

# ENVIRONMENT MANAGEMENT SYSTEM

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## 6.1 Reviewing the Accident Plan

- 6.1.1 The accident plan will be reviewed annually and updated accordingly.
- 6.1.2 Following any updates, all staff will be briefed.

## 6.2 Contact Information for the Public

- 6.2.1 A notice board is displayed outside the site which includes:
  - Company name and permit holders name;
  - Emergency contact information;
  - Statement that the site is permitted by the EA;
  - The permit number; and
  - EA telephone numbers.

## 6.3 Complaints Procedure

- 6.3.1 Any complaints made about operations on the site must be made by telephoning the site office, to Natural Resources Wales hotline (phone number 0300 065 3000), in writing or by using the company complaints form, at Appendix 1.
- 6.3.2 To gather enough information to enable a proper investigation, all complaints received must provide as a minimum the level of detail required by the complaints form. All complaints will be responded to within 5 working days of receipt.
- 6.3.3 Complaints will be investigated by the site manager to find a cause of the complaint using information from the site diary to determine the cause. As necessary, operational procedures will be updated and staff will receive refresher training on procedures.
- 6.3.4 A copy of the complaint, investigation and response will be recorded and made available to Natural Resources Wales for inspection.

## ENVIRONMENT MANAGEMENT SYSTEM

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6.3.5 Any complaints received by the site direct will be notified to Natural Resources Wales by using the hotline telephone number or national email address and the notification form in Schedule 5 of the environmental permit. A copy of the sent notification form and any attachments will be retained by the operator's head office.

## 7 STAFF COMPETENCY AND TRAINING RECORDS

### 7.1 Responsibility

7.1.1 The Site Manager will be responsible for day to day operations and ensuring compliance with the environmental permit and other relevant legislation.

### 7.2 Technical Competence

7.2.1 The site will be managed by nominated technically competent managers. Natural Resources Wales will be kept informed of any changes to the nominated technically competent managers. The nominated technically competent managers will hold the relevant WAMITAB qualification and shall maintain continuing competence every 2 years.

7.2.2 There are several technically competent managers within the company and there is always a minimum of one on site.

7.2.3 Attendance of the technically competent managers will be recorded in the site diary.

### 7.3 Training

7.3.1 All staff employed at the site will be fully trained in the use of relevant machinery and procedures involved in the Management System and Fire Prevention Plan, including accidents/incidents, complaints, fire and waste acceptance.

7.3.2 All new staff receives induction training on commencing employment. Their training and qualification record will be inspected. Regular refresher training will be undertaken on a relevant basis.

7.3.3 A copy of training records for each member of staff will be maintained by the operator's office for the length of service of each employee. This will be regularly checked and updated as necessary.

7.3.4 Sid Dennis and Sons Limited are externally audited for Health and Safety requirements. All records of these audits are retained for a minimum of 6 years and are located at the site office.

7.3.5 The sites training needs will be annually reviewed and updated within a training matrix.

## ENVIRONMENT MANAGEMENT SYSTEM

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7.3.6 Training for the use of the plant and equipment will be provided by the manufacturer and records retained on site.

## 8 KEEPING RECORDS

8.1.1 All records required to be made by the Management System and the environmental permit will be retained at the operator's head office or the site office for a minimum of 6 years unless stated.

8.1.2 Copies of waste transfer notes will be retained at the site office for a minimum of 6 years.

8.1.3 A site diary and daily site checklist will be kept to record the following:

- Accidents;
- Incidents / emergencies on site;
- Site inspections (by EA and internal site checks);
- Any remedial works undertaken;
- Action taken in relation to complaints;
- Severe weather conditions;
- Contingency plan actions;
- Time on site for technically competent managers;
- Waste received;
- Maintenance of equipment, machinery and vehicles; and
- Site infrastructure checks and remedial action.

8.1.4 Records will be kept of all waste deliveries which comprise:

- Its quantity (weight or volume);
- Its List of Waste (LoW) Code;
- Its origin;
- The identity of the producer of the waste;
- The date the waste arrives at your site;
- The date the waste was first produced, if the waste is likely to cause odour; and
- Any quarantined materials that are part of the delivery, and what you did with them.

## **ENVIRONMENT MANAGEMENT SYSTEM**

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8.1.5 Duty of care requirements as a business that produces waste will be accorded with.

### **8.2 Reporting**

8.2.1 Quarterly waste returns will be submitted to Natural Resources Wales within 1 month of the end of each quarter and retained for a minimum of 6 years.

8.2.2 An identification board will be visible from the site entrance indicating a contact number for whom to contact in an out of hours emergency, the permit number, the operator and the opening hours.

8.2.3 Copies of notifications of incidents, accidents and complaints made to Natural Resources Wales as a notification will be retained for 6 years.

### **8.3 Notifications**

8.3.1 Natural Resources Wales will be notified using the Notification form in Schedule 5 to the environmental permit of any breakdown of essential equipment or severe weather condition as soon as possible.

8.3.2 If the operator changes the registered company trading name, registered office address or takes steps to go into administration the operator will inform Natural Resources Wales within 14 days.

8.3.3 The minimum staffing levels for the site are a site manager, supervisor and weigh bridge operator. These staff then manage the others on site.

## **9.0 COMPLIANCE**

### **9.1 Compliance checking**

9.1.1 The company carries out daily inspection and all results are recorded

9.1.2 The daily inspections are focused on operational / environmental / health and safety matters.

9.1.3 Those relating to the environment will also relate to the permit.

# ENVIRONMENT MANAGEMENT SYSTEM

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## 9.2 Compliance recording

- 9.2.1 All compliance inspections are recorded on paper.
- 9.2.2 Records are stored in the office.
- 9.2.3 non-compliances in line with the sites inspection and associated environmental non-compliances.

## 9.3 Compliance Investigating

- 9.3.1 When a non-compliance inline with the environmental permit is recorded it will be investigated.
- 9.3.1 The investigation will identify the root cause of the non-compliance.
- 9.3.2 The following questions will be asked –
  - Who was involved and who was responsible?
  - What happened?
  - Where did it happen?
  - When did it happen?
  - How did it happen?

## 9.4 Compliance Resolution

- 9.4.1 Once the investigation into the non-compliance has taken place a plan can be put into place to resolve the non-compliance.
- 9.4.2 All non-compliance resolutions will be recorded and saved in paper or digital format.

## 10.0 CLIMATE CHANGE

Climate predictions for the UK suggest that we can expect higher average temperatures – particularly in summer and winter more heat waves and hot days, rising sea levels changes in rainfall patterns and intensity more storms

It is important that Bersham (Glenside) Ltd considers if a changing climate could affect its operations, including how this might affect our ability to comply with our permit.

# ENVIRONMENT MANAGEMENT SYSTEM

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## 10.1 Flood

10.1 As covered in section 5.4 the site is not located with a Flood zone. Annually Natural Resources Wales 'Flood Map' for Planning', will be reviewed annually.

## 10.2 Drought

10.2 The physical process of mechanically sweeping roads uses large volumes of water. However these are not linked to the sites activities and would not impact on the dewatering process.

In the event of a drought and potential water use restrictions the company may consider filtering the water from the dewatering process for use within the sweepers to maximise this resource.

## 10.3 Increased Temperatures

With the potential for increased temperatures the impacts can be split into two main areas of consequence –

### Fire

With the potential increase in temperature this may lead to the increase in the temperature of stored wastes, however there are no flammable wastes stored on the site.

### Odour

The increase in temperatures may increase the risk of odours due to the heating of wastes, however the waste that is accepted is not odorous.

## 10.4 Communities

The impact on the local community is currently unknown. However, its impact will be able to be identified and subsequently managed as a result of the companies complaints procedures.

## 10.5 Review

This document is reviewed and updated annually after the environmental permit has been issued however, will be reviewed and updated if there are any operational changes, legislative changes, guidance changes, complaints or in the event of a fire of any size or severity.

# ENVIRONMENT MANAGEMENT SYSTEM

## APPENDIX 1: COMPLAINTS FORM

<b>Complaint Report Form</b>	
Date of making complaint:	Name and address of complainant:
Telephone number of complainant:	
Form completed by:	

Nature of complaint *delete as necessary	Noise / Vibration / Pests / Odour / Dust / Litter *
Date of complaint:	
Time of complaint:	
Location of where the complaint was detected, if not at above address:	
Weather conditions on date of complaint (i.e., dry, rain, fog, snow):	
Temperature on date of complaint (very warm, warm, mild, cold or degrees if known):	
Wind strength on date of complaint (none, light, steady, strong, gusting):	
Wind direction on date of complaint (eg from NE):	
Complainant's description of complaint: e.g. <ul style="list-style-type: none"> <li><input type="radio"/> What does it smell like?</li> <li><input type="radio"/> What does it sound like?</li> <li><input type="radio"/> What pests?</li> <li><input type="radio"/> Level of dust?</li> </ul>	
<input type="radio"/> Intensity (see below for odour):	
<input type="radio"/> Duration (length of time):	
<input type="radio"/> Constant or intermittent in this period:	
<input type="radio"/> Does the complainant have any other comments about the complaint?	
Are there any other complaints relating to the facility, or to that location? (either previously or relating to the same exposure):	
Any other relevant information:	

# ENVIRONMENT MANAGEMENT SYSTEM

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<b>INVESTIGATION - TO BE COMPLETED BY PERMIT HOLDER</b>		
<p>What was happening on site at the time the odour occurred?</p> <p>Check site diary regarding routine site inspections, details of abnormal working procedures, breakdown of machinery, accidents, incidents and non-conformances.</p>		
<p>What remedial measures have been undertaken to alleviate the complaint?</p> <p>Check site diary regarding actions taken to remediate the abnormal working conditions.</p>		
<p>Are mitigation procedures for abnormal operating conditions still in place?:</p> <p>For how long will abnormal mitigation procedures be in use?:</p>		
<p>Has the complaint been resolved?</p>		
<p>Date of investigation: Investigation undertaken by:</p>		
<p>Actions taken:</p> <p><input type="checkbox"/> Ensure investigation undertaken within 5 days of receipt</p> <p><input type="checkbox"/> Send copy of investigation to complainant</p> <p><input type="checkbox"/> EA notification completed?</p>		
Form completed by:	Date	Signed

**Intensity**

0 No odour

3 Distinct odour

5 Very strong odour

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1 Very faint odour  
2 Faint odour

4 Strong odour

6 Extremely strong odour