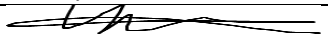
ENVIRONMENTAL FOCUS LTD

Achieving Compliance & Quality

Environmental Management System

Enviroventure Waste Solutions Ltd

Report compiled by:	Gareth Hill	Environmental Focus Ltd
Customer:	Diana Jones	Enviroventure Waste Solutions Ltd
Requirement:	Permit variation	Add treatment activities
Date of Submission:	January 2025	
Signature:		Gareth Hill
Version number and date:	Version 1	Review due February 2026
	V3	Updated for NRW March 2026

All work that is carried out as part of this agreement is on an advisory basis only. No liability will be taken by Environmental Focus Ltd for any works undertaken by the client as the service is based on recommendations and advice only.

1. Introduction

This EMS is designed to highlight and dictate the on-site processes for the company should they be used on site. It will be subjected to regular review in line with operational and legislative changes. The document has been produced in line with current best practice and in accordance with all relevant legislation.

This EMS replaces all previous versions and should be used as the only operational EMS going forward. This document, along with all other management documents and permits are stored in the site office and are freely available for inspection by anyone who requests them. All staff are aware of the location of the file and are encouraged to use the documents if required.

The following documents were used as to aid the formulation of this management system and the associated documents. The standards outlined within these documents will be adhered to throughout site operations:

How to Comply, SGN5.06, H1 guidance, H4 guidance.

TCM

The site TCM has successfully upgraded the qualifications to enable them to act as the competent member of staff on site. These certificates have been provided to NRW previously. In addition to this, an external Environmental Consultant is employed to undertake monthly inspections to ensure that compliance with all permit conditions is being achieved.

2. Site Operations

For all waste accepted on to the facility full upstream checks are to be carried out before new waste types or suppliers are to be allowed to import waste on to site where appropriate.

Pre-acceptance Procedures

The pre-acceptance procedures adopted at site are in accordance with the Sector Guidance Note 5.06 section 2.1.1 and the relevant guidance notes where appropriate. To ensure that unsuitable wastes are not accepted onto site, the senior management team will be used to ensure that the materials delivered are suitable to be recovered on site. This will be done by checking that the waste being delivered firstly is coded correctly and secondly whether the EWC code is on the list of permitted wastes at site. This assessment will be visually and olfactory only. If it is deemed that the wastes are not suitable to be recovered on site because of these procedures; they will not be accepted and will be returned to the waste producer.

A pre-acceptance screening procedure will be used to ensure that the wastes that are being proposed for delivery comply with firstly the requirements of the environmental permit held and secondly, whether the wastes are suitable to be recovered. This process will involve a review of information from the waste producer.

All waste deposits to be utilised within the treatment processes will therefore be either pre-booked for acceptance to site or inspected at the weighbridge.

On arrival all wastes will be visually checked to confirm that they meet the description and EWC assigned by the waste producer. If not, they will not be accepted on to site for any recovery operation and will either be returned to the waste producer or quarantined on site.

Pre-booked deliveries will have to have the following information assigned to them:

- How the waste was derived including any variability within the process.
- The EWC code assigned for the waste.
- Chemical analysis (if required) and composition of the waste.
- Quantity of waste to be delivered.
- Any hazards within the waste.
- Contingency plans for non-conforming waste should the need arise.

Testing (if required) of feedstock supplies will identify the following:

- Nature of the waste and how it has arisen
- Any variations in the feedstock
- Inhibitory values in the feedstock
- Biodegradability of the feedstock

Wastes should not be accepted at the site without a clear method or defined treatment and disposal/recovery route with a full costing.

Acceptance procedures

All wastes that are received at site are both visually checked when tipped off and during treatment operations.

Duty of care paperwork is checked by the operative in the reception area to ensure that the waste is compliant with the EWCs on the permit of the site.

Due to the nature of the waste and how it is collected, there is inevitably going to be a certain amount of contamination in the waste. However, due to the type of waste being accept this is not foreseen to be a major issue. A quarantine area/skip will always be available on site for this material and is shown on the attached FPMP site plan.

Waste will then be stored in the appropriate area for the waste type for bulking up and onward processing. Wastes will remain on site for as short a period as possible.

For all loads received, a detailed record is kept that will contain the following information:

- Description of waste
- EWC code
- Date and time of delivery
- Weight of load
- Waste carriers registration number

A log is kept (for waste return purposes) of all waste that is accepted at site. This log is checked each quarter, and this ensures that the permitted tonnage will not be breached. If this figure is reached, then waste rejection procedures (detailed below) will be initiated to remain compliant on site.

The maximum safe storage on site at any one time is approximately 1500T. The site doesn't have any restrictions on height of stockpiles through planning but will endeavour to ensure compliance with the NRW fire guidance and maintain stockpile heights to a maximum of 4m. The maximum throughput per year will not exceed 5,000T and as such this tonnage will not be exceeded for storage across a given year. No hazardous wastes will be accepted, stored or treated on site.

Separation distances will be maintained to be as large as those identified within the FPMP. Where possible in quieter times, the gaps will be greater than those detailed. The site is progressively extending and improving the level of concrete and general infrastructure on site and have a 5 year plan to ensure all areas are upgraded. Within this timeframe A-rated fire blocks are to be installed across the site and between the stockpiles on site. This will be done one at a time, with maximum separation gaps being maintained throughout the stockpiles where no fire walls are installed. The aim is to have 2 fire walls installed by the end of the first improvement phase to ensure maximum storage on the site but with maximum fire risk protection and compliance. As each phase is constructed, NRW Regulatory officers will be informed with photographic logs. Upon permit issue, the yard itself will be fully concreted and the entire yard will be linked to a sealed and submerged collection tank with oil interceptor.

Rejection procedures

Waste shall only be accepted at site if it conforms to the list of permitted wastes and if it conforms to the written description of the waste producer.

If, in the unlikely event a waste is accepted onto site that does not comply with the above or it appears that after acceptance the wastes are incompatible, then the usual site rejection procedures will be enforced:

- The waste will be separated from any other wastes currently on site and will be stored on an impermeable surface that benefits from sealed drainage (if deposited). If appropriate, the material will be isolated in an empty skip/container as required. If this does occur, the incident will be logged within the site diary, reported to NRW and if possible, the waste producer contacted and issued with a warning from EWS. If this is to happen after a warning has been issued, the waste producer will be prevented from using the facility in the future.
- The driver of the load will be instructed to return the load and provided will detailed reasons as to why the load has not been accepted at site (if not deposited).
- NRW will be informed of the non-compliant load and sent a copy of the on-site log of the activity that will detail the origin and carrier of the load.

3. On site treatment processes

The site is designed to store, separate and bulk up wastes accepted from a variety of sources. The primary waste type accepted is mixed C&D waste with the main function of the facility to separate

selected recyclable materials by a combination of manual and mechanical processes. To facilitate in the storage of these wastes further processes may be undertaken if required and as applied.

The site is split into several processing/storage areas:

- Waste reception: The waste received at site is unloaded in this area for inspection and determination of processing. The materials will be separately stored depending on waste type and kept in dedicated areas pending onward recovery elsewhere. For example, all wood and metal will be stored away from other materials, so contamination of other wastes is reduced. When the waste load is mixed in nature, it will be checked, then added to the relevant pile pending the most appropriate treatment below.
- Waste storage: The waste storage areas are designated zones where the storage of both mixed and segregated material is held pending onward processing if required. When the stockpiles within these zones are full, they are removed from site post treatment (below) and taken for onward recycling. Selected materials are pulled from the mixed piles and stored in dedicated skips and bays manually, these are limited to plastics, metals, cardboard, small WEEE and larger wood items at present.
- Bulking up only: Waste such as food is rarely accepted on site, however, when it is accepted, it is accepted separately and stored on its own and not mixed with other materials. There is a dedicated sealed skip on site for food waste only. This is stored in isolation and is only on site for 7 days maximum before its removal. Plasterboard, WEEE and the post processed fines and residual wastes are also bulked up only pending removal. All remaining waste types are bulked up for varying time scales prior to processing that is suitable to the waste types as detailed below.
- Trommel: This process is to be added as part of this variation. The aim to further segregate materials from the bulk waste piles to allow for more effective recycling and recovery. This treatment process will be used for the mixed and Inert wastes only.
- Bailing: This process is to be added as part of this variation. Bailing is to be undertaken within the dedicated building on site. The aim is to use this area for materials such as cardboard and plastics to allow for easier onward transport to the end users.
- Screening of material: This process is to be added as part of this variation. The aim is to further separate and grade the inert side of the materials to allow for cleaner recycling and easier onward recovery.
- Shredding of material: This process is to be added as part of this variation. The aim is to treat the materials post separation (residual wastes and wood only), to allow for more efficient throughput and transport off site. This activity will only take place once every 6-8 weeks for a period of 4-5 days at a time.
- ELV: this activity is not permitted by this site permit. However, a second permit is held to allow this activity on site. The activity is not currently active and has not been for several years. There is no intention of accepting ELVs to the site. This storage and activity has its own dedicated building and does not interfere with any activity under this permit (see site plan for locations etc).

For all wastes received at the site, the waste hierarchy will be followed and waste to be disposed of at landfill will be reduced and avoided wherever possible. The addition of the new treatment activities for the site will allow for easier compliance with the requirements of the hierarchy due to

more practical onwards recycling post-treatment. All site staff are aware of the need to follow the hierarchy across all waste streams accepted:

Stockpile sizes and storage times

The table below details the maximum storage pile size and the maximum length of time each waste type will be held on site prior to and post processing:

Waste Type	Max. Dimension (lxwxh)	Max Volume (m3)	Max Storage Time
Mixed C&D	9 x 8.5 x 4	306	4 weeks
Mixed HCI	9 x 8 x 4	288	5 weeks
Wood	9 x 8 x 4	288	4 weeks
Plastic	1.25 x 8 x 3 (2 rows)	60	6 weeks
Cardboard	1.25 x 8 x 3 (2 rows)	60	6 weeks
Metals	40yd skip	As per skip	7 days
Inert	10 x 5 x 4	200	14 days
Shredded	8 x 8 x 4	256	4 weeks
Fines	9 x 5 x 4	220	7 days
WEEE	40yd skip	As per skip	4 weeks
Food	8yd sealed skip	As per skip	7 days
Plasterboard	40yd skip	As per skip	7 days
Cardboard	40yd skip	As per skip	7 days
Plastic	40yd skip	As per skip	7 days

Impacts of the new activities

The addition of the new activities has the potential to increase the risk to the surrounding environment and receptors beyond what has been seen previously. The attached risk assessment (EWS_Environmental RA_Sept 2025 (Appendix) fully considers the risk of each activity on land, air, water and neighbouring units. However, in summary, the addition of the treatment processes has identified a non-existent impact-low scoring due to the site location, infrastructure in place and/or management practices adopted on site for the new treatment activities. There is always the risk of equipment failure when working with heavy plant. However, as the plant is hired in it is serviced and checked prior to be received on site for each use. This significantly reduces the risk of pipes splitting etc as they are integrity checked regularly. However, spill kits and absorbent granules as well as the Pollution Prevention Equipment (PPE) disposal bags are held on site within the stores, these will be quickly deployed if required. If the dust sprays were to fail, then the activity would either stop or be

manged with mains fed hoses for spraying. Checks will be undertaken throughout the day by operational staff to ensure that the integrity of the plant is maintained.

4. Permitted Waste

The site shall only accept the wastes identified within the relevant table within the permit held, no additional EWC codes are being applied for in this application. The list below confirms the only required EWC codes to be listed in the permit:

Waste code	Description
02	**WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING**
02 01	**wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing**
02 01 10	waste metal
07	**WASTES FROM ORGANIC CHEMICAL PROCESSES**
07 01	**wastes from the manufacture, formulation, supply and use (MFSU) of basic organic chemicals**
07 02	**wastes from the MFSU of plastics, synthetic rubber and man-made fibres**
07 02 13	waste plastic
15	**WASTE PACKAGING, ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED**
15 01	**packaging (including separately collected municipal packaging waste)**
15 01 01	paper and cardboard packaging
15 01 02	plastic packaging
15 01 03	wooden packaging
15 01 04	metallic packaging
15 01 05	composite packaging
15 01 06	mixed packaging
17	**CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)**
17 01	**concrete, bricks, tiles and ceramics**
17 01 01	concrete
17 01 02	bricks
17 01 03	tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02	**wood, glass and plastic**
17 02 01	wood
17 02 02	glass
17 02 03	plastic
17 03	**bituminous mixtures, coal tar and tarred products**
17 03 02	bituminous mixtures other than those mentioned in 17 03 01
17 04	**metals (including their alloys)**
17 04 01	copper, bronze, brass
17 04 02	aluminium
17 04 03	lead
17 04 04	zinc
17 04 05	iron and steel
17 04 06	tin
17 04 07	mixed metals
17 04 11	cables other than those mentioned in 17 04 10

17 05	**soil (including excavated soil from contaminated sites), stones and dredging spoil**
17 05 04	soil and stones other than those mentioned in 17 05 03
17 05 08	track ballast other than those mentioned in 17 05 07
17 08	**gypsum-based construction material**
17 08 02	gypsum-based construction materials other than those mentioned in 17 08 01
17 09	**other construction and demolition wastes**
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
19	**WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE**
19 12	**wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified**
19 12 01	paper and cardboard
19 12 02	ferrous metal
19 12 03	non-ferrous metal
19 12 04	plastic and rubber
19 12 05	glass
19 12 07	wood other than that mentioned in 19 12 06
19 12 09	minerals (for example sand, stones)
20	**MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS**
20 01	**separately collected fractions (except 15 01)**
20 01 01	paper and cardboard
20 01 02	glass
20 01 08	biodegradable kitchen and canteen waste
20 01 34	batteries and accumulators other than those mentioned in 20 01 33
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35
20 01 38	wood other than that mentioned in 20 01 37
20 01 39	plastics
20 01 40	metals
20 02	**garden and park wastes (including cemetery waste)**
20 02 01	biodegradable waste
20 02 02	soil and stones
20 03	**other municipal wastes**
20 03 01	mixed municipal waste
20 03 07	bulky waste

5. Staff Training

The site manager is responsible for ensuring that all staff working at the site are competent in the duties required of them. An induction training programme will be carried out if required and signed by each member of staff, this is also the case for ongoing training sessions and toolbox talks etc.

Training sessions will be updated/refresher training will be provided following any major changes to the site operations or waste codes etc. Additionally, if an incident were to occur on site, then full audit and retraining will be provided to all employees.

6. Site Infrastructure and drainage

The site is served by a sealed drainage system. The building is sealed and so any liquids that are created through spillage etc will not flow outside of the immediate area. The perimeter of the building is sealed by a concrete bund/blocks. All liquids will be contained within the building and site boundary.

All clean water such as rainwater from roof tops etc are diverted away from the waste storage areas where possible.

Road vehicles will use the access road and the front area of the site only, therefore the creation of mud and debris, is anticipated to be minimal. If this does however become an issue, wheel-washing facilities can be made available on site as part of the maintenance area.

Every effort will be made to control any leaks and spillages from occurring in the first instance. However, it is recognised that liquid wastes from spillages and plant failure can occur. Every incident of this type will be classed and treated as an emergency on site. Spill kits will be held within the site and used as and when required. The now contaminated materials used, will be cleaned up and held in isolation until they are consigned off site to an appropriate facility.

Any spillages or leakage will be reported to NRW, along with the on-site spillage remediation paperwork following the appropriate procedures below.

The waste storage area is fully concreted and bordered by a wall/kerb area to ensure that waste doesn't get off the concrete pad. A sealed sump has been constructed within the concrete ensuring that all liquids that are created within this area are collected effectively and can be removed from site when required by using a fully licensed and appropriate contractor.

The drainage sump is visually checked for integrity as far as possible each time it is emptied, it is also checked annually by a competent contractor to ensure that no cracks etc have developed.

Please refer to the attached site plan for the general layout of the site and storage areas for all waste stockpiles.

7. Emissions

Due to the effective processing and monitoring of waste as well as the quick turnaround of removal from site, emissions of any type are not anticipated to be an issue. All emissions created by the site have been fully considered and assessed in the attached Risk Assessment.

However, all emissions will be dynamically risk assessed each time any of the treatment processes are being undertaken as variations in the waste cannot be fully accounted for. Monitoring of all emissions will be undertaken in accordance with the submitted management plans (odour, dust, noise etc). For example, if pests are noticed to increase, further measures will be initiated to control the issue. This may be a review of incoming material or the employment of pest control specialists.

Litter (as well as all other potential emissions) will be managed on site daily via visual checks. Due to the waste types being tipped and sorted within the site and the netting installed around the storage area, wind-blown wastes are not thought to be an issue. However, if waste is noticed within the surrounding yard area, an operative will be tasked to pick all litter created and ensure it is stored appropriately. When the storage areas are full and are being stored pending removal from site, if litter is being created, they will be stored under a netting (or similar) to ensure that wind-blown material is reduced.

Spillage procedure

All staff are to wear the required PPE to ensure work is carried out safely.

- Identify the source of the spill
- Communicate the source of the spill to required staff
- Deploy spill kit asap
- Isolate the drains if possible
- Once the spill has been cleared, ensure correct disposal of spill kit materials
- Record/log spill in site diary
- Inform NRW and DCWW (if appropriate)
- Initiate a re-stock spill kit
- Undertake an incident review/investigation

Once an internal review has been undertaken, all relevant staff will be informed of the findings and training logs will be updated if required. As a minimum, the review will cover the cause, actions taken, resources used, missed opportunities and prevention measure effectiveness.

8. Site security and maintenance

As part of the daily site activities, the security fencing/wall panels and general site infrastructure will be checked for integrity. The site is concreted (used for storage and waste reception) and the area of the site that is laid to hardstanding, is located towards the front of the site where only inert materials on a small scale are held as well as empty skip storage.

If any defects are noted, they will be logged with the company director and senior management immediately and a programme of works will be initiated if the defects are found to be major and in need of urgent repair.

Emergency contact details will be available on the site identification board should they be needed after hours.

Planned Maintenance of all on site plant will be undertaken in accordance with the manufacturer recommendations for the plant. The only plant permanently located at the site is the baler (electric), front loading shovel and grab. All other plant is to be hired in as and when required (trommel, screen and shredder) therefore, this plant is maintained by the hire company. All site-located plant is

visually checked each day prior to start up. All oils/fluids are checked as well as all pipe connections. The plant is serviced in accordance with the manufacturer guidelines when the service periods are recommended (usually after so many hours of operation), for Enviroventure Waste Solutions, this is approximately every 3 months.

9. Site Condition

The site has continued to ensure that the Environment is protected and that site operations, across the life of the permit, do not negatively impact upon the wider environment. The progressive improvement of infrastructure such as the concrete area where the waste is stored and treated, the sealed drainage sump and the netting surrounding the waste, all ensure that any contamination that could be created by the waste is controlled and contained.

The site has had one major incident (2022) when a fire spread from a neighbouring site and caught the waste on site. Though the fire caused smoke to pollute the air, run-off from the fire water was contained to the concrete and drainage sump by effectively bunding and emptying the sump throughout and after the incident.

10. Complaints

There is a form dedicated in the Annex list to be completed by the competent person or director when reviewing the grounds for a complaint. The response time is 5 working days to all complaints unless otherwise requested by the operator. The operator notes that in the event of there being significant pollution it will advise NRW of the occurrence and any actions taken.

11. System Procedures

Environmental Review

Scope- The review acts as an audit to ensure the company is compliant with relevant legislation. It relates to performance that are linked to environmental issues.

Procedure-

- The review itself must be subject to an audit to ensure that it is fit for purpose.
- Must be updated annually or if/when site procedures change significantly from normal operations.
- Each section must be reviewed and maintained as still relevant to operations. If not, modifications must be made to both practices on site and review methodology.
- If modifications are required, they should be highlighted in the original text so the reader can find the alteration.
- The review recommendations should act as the basis for the improvement plan.

Responsible person- Environmental Representative

Improvement Plan

Scope- Defines the methodology for highlighting and then implementing the environmental improvement plan for the site.

Procedure-

- To set a realistic programme of improvement that will run alongside a clear guide on how to achieve the improvements required.
- The plan shall be informed by the environmental review as well as any external audits (such as NRW inspections).
- The plan is to be kept up to date and maintained throughout the year and as actions are completed.
- A plan is to be produced on an annual basis; the term doesn't have to run January to December.
- The plan must be made available to all staff and stakeholders if required.
- If a review highlights a non-compliance, this will be acted upon and recorded immediately.
- All improvements are to be reviewed annually. If some have not been acted upon, then they can be rolled over but with full justification.

Responsible person- All relevant staff for actions

Environmental records

Scope- To ascertain what data and information needs to be logged and kept.

Procedure-

- It is the responsibility of the company director to ensure that all records are accurately kept.
- All incoming and outgoing materials must be logged to ensure accurate reporting.
- WTN should be kept for a minimum of 2 years
- HWCN must be kept for a minimum of 5 years

Declaration of Roles, Responsibilities and Resources

The company director with assistance from key site management will have the overall responsibility for Environmental issues for the site. Advice is sought from an external Environmental consultant The responsibilities will include, but will not be limited to:

- Implement, maintain and review the Environmental Management System (EMS).
- Update and comply with the published Environmental Policy.
- Monitor site inputs and outputs.
- Achieve and review all site targets.
- Ensure staff are made aware and appropriately trained in their roles and responsibilities as well as any new directives etc

Senior management will ensure that all appropriate resources are made available and that adequate time is permitted for all staff to undertake their role correctly.

Annex List

A--External Complaint Form

Date and time of complaint:	Complaint reference number:
Name of complainant (if available):	
Contact details of complainant (address and phone number):	
Date and time of incident (if different):	
Detected location of complaint/ emission (NGR if available):	

Weather conditions:	
Wind direction and speed:	
Complainant description of issue:	
Other comments/observations from complainant:	
Receptor Sensitivity: (Low, medium or high)	
Previous complainant (Y/N):	
Mitigation Report reference number:	
Form completed by (sign and date):	

Impact rating	Description
0	No impact (unsubstantiated report)
1	Very slight impact
2	Slight impact
3	Distinct impact
4	Strong impact
5	Very strong impact
6	Extremely strong impact
Receptor Sensitivity: Low (footpath, road) Medium (ind./com. premises), High (Residential)	

B—Mitigation Report

Report Completed by:	
Date and Time:	

Responsible member of management:	
Report Reference:	
External Complaint Reference Number:	
Confirmed Source of complaint:	
Suspected Source:	
Weather Conditions:	
Wind Speed and Direction:	
Further Action Required on Site?	
Corrective Actions Undertaken:	
Issue Eliminated at Site:	
Impact Eliminated at Detection Location:	

Complainant Contacted by:	
Date and Time:	
Incident Closed by:	
Date and Time:	

C--Accident Management Plan

Site Information

SITE DETAILS	
Unit phone no: 01646 697796	Mobile contact: 07974 818891
EMERGANCY CONTACT DETAILS	
Emergency services: 999	
Local Police: 999	
Natural Resource Wales: 0300 065 3000	
COMPANY CONTACTS (Out of hours)	
Owner:	Diana Jones (number as above)
Site Supervisor:	As above
Environmental Consultant:	Gareth Hill 07494310727

This accident management plan contains the following information and steps within that are detailed in the relevant table sections below:

1. Immediate actions
2. Secondary actions–depending on type of accident.

Recording Incidents

All incidents that have caused or could result in environmental pollution are recorded immediately following the event on an internal Site Incident Report if required.

If deemed necessary and in the event of a major accident or incident on site, NRW will be contacted through the Regulatory Officer, or the incident hotline detailed above.

Emergency Procedures

In the event of an emergency, the following procedures shall be followed:

Immediate Actions:

- Raise alarm where human safety is at risk.
- If necessary, contact emergency services, dial 999 and ask for the relevant service.
- Extinguish all naked flames.
- Obtain help from other members of staff nearby.
- In all cases wear and use appropriate Personal Protective Equipment.

Secondary Actions:

Follow appropriate procedures for type of accident as described in the following tables.

Accident Type	Anticipated Consequences	Action to be taken (listed in order of priority)
1. Overflow or failure of: • Fuel, Oil tank or drum • Chemical spillage. • Spillages during loading, unloading or internal transport operations. • Failure of automatic liquid level control sensors and devices • Surface water flooding from adjacent land/nearby watercourse. • Off-site pollutants at risk of entering site. • Contaminated surface water from firefighting or other emergency activity.	Potentially polluting liquids flow over yard to interceptor and off site.	1. If possible, quickly stem source of liquid 2. Assess route of discharge and identify easiest method and location to prevent further discharge. 3. Key points identified: Interceptor Drains: • block with sandbags • cover top with drainblocks • insert interceptor bung (if safe to do so) 4. Runoff from edge of yard to be stemmed - use sandbags down gradient of drains to contain spillage within site hardstanding and direct any contamination into interceptor drains where possible. 5. Contact Manager (note; this may be whilst any of the above is being carried out. 6. Consult Product Data Sheets (COSHH) if appropriate. 7. If necessary, contact Natural Resources Wales. 8. If necessary, use vacuum tanker or pump to clean up spillage and

Accident Type	Anticipated Consequences	Action to be taken (listed in order of priority)
		interceptor containing contaminated water and dispose of safely. 9. Transfer to local treatment facility or place contaminated materials in another appropriate storage vessel for treatment. 10. Make temporary repairs if appropriate. 11. Clean up contaminated areas. 12. Dispose of contaminated materials safely 13. Assess cause and take action to prevent repeat. 14. Record incident, measures taken and to be taken.
2. Fire • fuels & oils • chemicals • buildings	Spreading between buildings and stores. Toxic and polluting smoke. Wind dispersion of pollutants. Surface runoff from fire fighting water. Refer to the attached FPMP.	1. Raise alarm on site. 2. Ensure all non-essential persons are evacuated from danger area. 3. If you are trained and it is safe do so, fight fire as appropriate. 4. If safe to do so, turn off electricity/fuel supplies throughout site 5. Ensure all staff on site are alerted. 6. Most senior person on site is responsible for calling the fire brigade and other emergency services necessary. 7. If necessary, contact Natural Resources Wales.

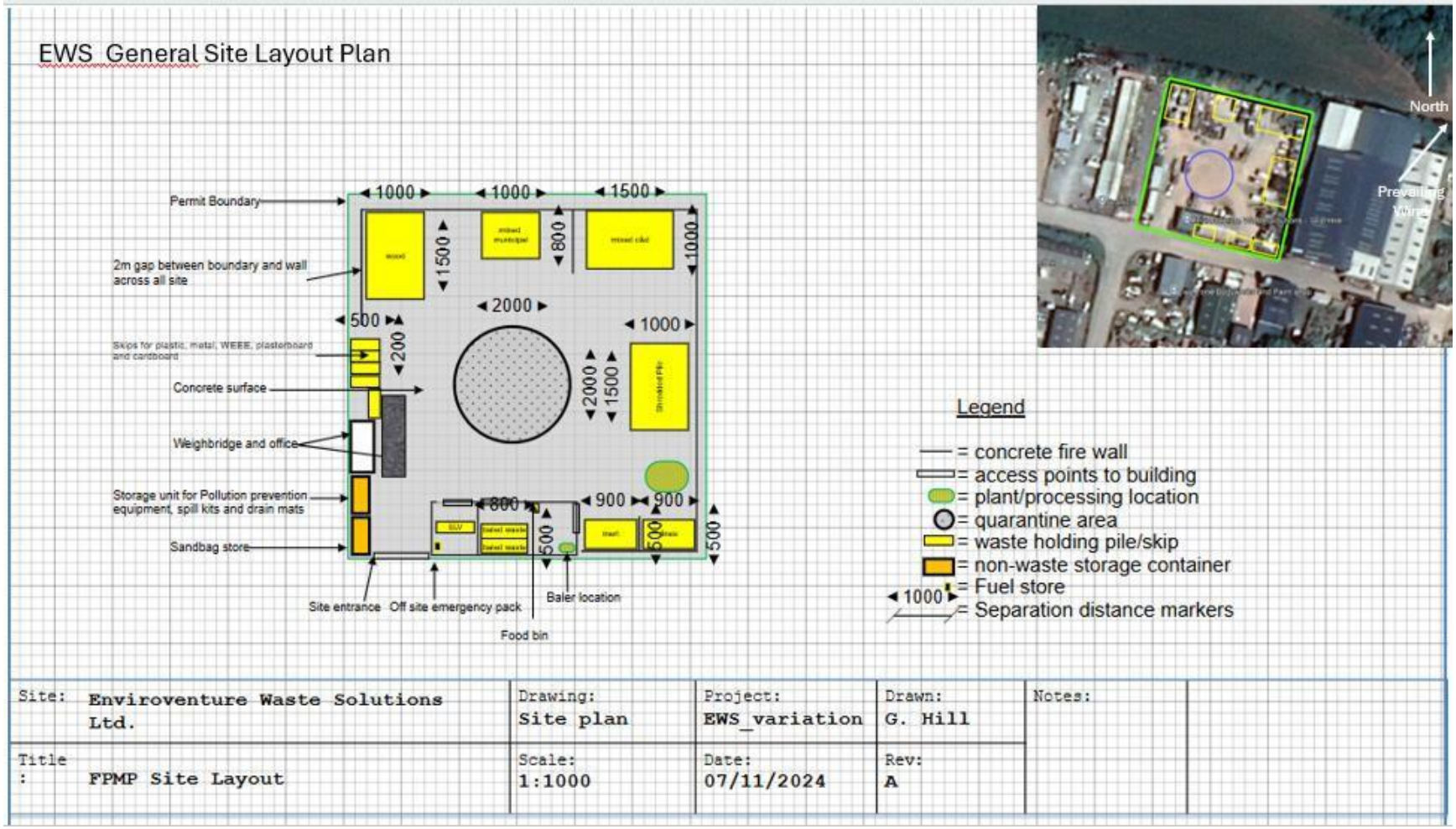
Accident Type	Anticipated Consequences	Action to be taken (listed in order of priority)
		8. Post member of staff at bottom of roadway to direct emergency services. 9. Liaise and follow instructions of emergency services making them aware of risks and hazards, provide copy of Accident Management Plan and Fire Management Plan. 10. Consult Product Data Sheets (COSHH) if appropriate. 11. Do not enter or permit others to enter affected area unless it is safe to do so to evacuate persons. 12. Ensure fire fighting water and other liquids cannot cause pollution. 13. Move at risk materials (or if deemed more appropriate burning materials to a fire segregation area (quarantine) if there is a risk of the fire spreading.) Only do this if it is safe to do so using Plant and Equipment. 14. Clean up any materials that may be a hazard to the environment – where materials identified as containing asbestos are present specialist services are to be employed. 15. Dispose of contaminated materials safely. 16. Assess cause and take action to prevent repeat (Accident investigation process). 17. Record incident, measures taken and to be taken.

Accident Type	Anticipated Consequences	Action to be taken (listed in order of priority)
3. Severe weather leading to flooding and wind damage	Overflow of storage facilities, power outages, fire	1. As above to raise alarm if required. 2. Start emergency generator/obtain and have qualified electrician install if required. 3. Contact tanker company if required to pump out standing water that has overwhelmed the interceptor chamber. 4. Initiate repair for wind damage as soon as possible. 5. Contact NRW if required.

Receptor Communication

The site is located on a well established industrial estate where the businesses are in close contact with each other (internal roadways are privately owned by all companies, regular meetings are held). If there were to be a major incident of any type on site, all the local businesses can be quickly and easily contacted by phone or text message informing them and providing them with advice and guidance from the FRS/NRW. Beyond the local estate, local media will be used to inform the residents etc of the incident.

D—Site Plan


EWS General Site Layout Plan
Permit Boundary
2m gap between boundary and wall across all site
Skips for plastic, metal, WEEE, plasterboard and cardboard
Concrete surface
Weighbridge and office
Storage unit for Pollution prevention equipment, spill kits and drain mats
Sandbag store
Site entrance
Off site emergency pack
Baler location
Food bin
1000
1000
1500
1500
800
1000
2000
500
200
1000
2000
1500
800
900
900
500
500
500
North
Prevailing Wind
Legend
= concrete fire wall
= access points to building
= plant/processing location
= quarantine area
= waste holding pile/skip
= non-waste storage container
= Fuel store
= Separation distance markers
1000
Site: Enviroventure Waste Solutions Ltd.
Drawing: Site plan
Project: EWS_variation
Drawn: G. Hill
Notes:
Title : FPMP Site Layout
Scale: 1:1000
Date: 07/11/2024
Rev: A

Site Plan-Sensitive Receptors/areas within 1km

*please the submitted FPMP for label itemisation

Site Plan-Residential receptors (areas) within 1km

*please see submitted FPMP for label itemisation

Updated Environmental Risk Assessment

Location:	Enviroventure Waste Solutions Ltd
Location of Environmentally sensitive areas:	Not within 1km of the site
Risk Assessment completed by:	Gareth Hill of Environmental Focus Ltd
Date:	07/09/2025

Company name: Enviroventure Waste Solutions Ltd

Date of risk assessment: 07/01/2025

Risk (Source)	Pathway	Receptor	Risk Level if occurs	Risk Justification	Potential Impact	Control Measure	Residual Risk Level
Dust and fine particles	Air	Local residents, environment and businesses	Medium	The permit allows for the treatment of soils and aggregates on site by feeding them through the trommel screen. This activity in periods of dry weather can give rise to dust emissions. Additionally, the use of the shredding equipment for the wood and C&D/HCI residual wastes could also result in dust being created at levels above those on site currently.	Dust can lead to illness and respiratory conditions as well as being a general nuisance to local people. The placement and use of these items of plant potentially, without controls increases the risk of dust leaving site.	The plant that is used on site are all fitted with water spray systems as standard that can be turned on when conditions support the emission of dust. Additional sprays can be set up if required by using the hose system available via mains water. Weather conditions will be monitored by on site staff to ensure that excessive dust levels are not leaving the immediate area. All treatment occurs externally so wind impacts are increased. No trommel/shredding activities will be done when winds are above 30mph gusts. Post-treatment, all wastes are removed from site quickly to ensure wind activity on the stockpiles is minimised.	Low

Litter	Air	Local residents, environment and businesses	Medium	Due to the nature of how the wastes are accepted, stored and to be treated on site, they have the increased potential to be blown off site and create a nuisance. Shredded wastes are smaller than how they are accepted and so have a higher likelihood to be blown.	Litter could become a problem if uncontrolled as material may be blown off site and into neighbouring units and/or farmland. This could impact any grazing livestock as well as potentially polluting nearby watercourses.	As wastes are tipped at site, they are directed to a bay which is appropriate. All treatment and loading for removal are monitored by staff, litter picking is undertaken twice per day if required. Nets are installed around the waste storage areas to capture any wind-blown material before it can leave site. All stockpiles will be maintained at 4m or lower to reduce the impact of wind whipping on site.	Low
Mud on roads	Vehicle Movement	Local residents and businesses Watercourses	Low	As the is entirely concreted the risk of mud being pulled onto the roads is minimal. Only short-term storage is undertaken outside. The site processes soils and aggregates, in periods of wet weather the trucks that come in and out of the site have the potential to leave mud on the roads.	Mud could escape the site and get washed into the local surface water drains and therefore enter the watercourses locally. A human impact could be that neighbouring businesses and their customers may also be impacted by tracking through any mud on the roads of the estate.	The site surface doesn't tend to create mud/debris tracking as no movements on the site occur within muddy areas. During wet weather there is an increased risk of tracking, but if required a road sweeper will be hired to ensure external areas are protected. Whell washing facilities may also be installed if required.	Low
Noise and Vibration	Air and ground	Local residents and businesses	High	The site has applied to use all the following on site; a trommel, a screener, a baler and shredder. This will increase noise and vibration levels to beyond what is usual on a day-to-day basis. The baler is located inside a building and is 3 phase electric with a low dB rating. The other 3 are diesel powered and considerably riskier from a noise perspective and are to be hired in and used externally.	Noise levels above those that are 'normal' for an area can become a nuisance and impact on people health and wellbeing.	The Noise Impact Assessment has determined the actual noise levels to be created by the site. The report has concluded that when used in isolation (which is planned due to space constraints on site) no adverse impact will be observed by the local receptors with regards to all items of plant (see attached report).	Low
Flood	Watercourses or groundwater	Local residents and businesses Watercourses	Low	The site is not located on a flood plain and is not located near to any major watercourse that would allow runoff etc to be flooding the site. Surface waters that flow onto the site from the rooftops etc are collected in a drainage system and diverted away from waste storage areas.	If the flood were to site then there is potential for smaller fragments of waste and any physical (potentially chemical) contaminants to escape and either enter the waterways or ground/groundwater nearby.	All surface waters locally are directed to the main river which is lower than the entire site and some distance away. NRW flood mapping shows the area is not at risk.	Non-existent

Spillages	Through ground and overland flow	Ground, ground water, watercourses	Medium	Due to the amount of plant and equipment on site there is a potential for leakage or spillage of polluting substances such as oils and diesel to occur due to accident of breakdown.	Spillages of fuel (or any other potentially hazardous liquids) can have a significant impact on the environment and last for many years. Only non-hazardous materials are accepted to the site and so the most likely pollutant would be fuels/oil from the plant on site.	There are regular maintenance checks carried out on all vehicles at the site where there is a maintenance garage within the ELV shed. Weekly checks are carried out as part of this maintenance programme. The site holds emergency spill kits on site to prevent the migration of any spillages to the drainage system. Fuels are delivered to site and plant is refuelled away from the drainage systems to contain leaks if required.	Low
Silt release	Water flow	Watercourses and aquatic species	Low	The site store and treat both soils and aggregate that can both generate high levels of silt/sediment. The site drains to a sealed drainage system with no direct link to any system off site.	Silts can have a lasting impact on watercourse wildlife populations. Additionally, if silt were to be created, then dry out, dust levels could increase locally (see dust).	The edges of the site are entirely covered by concrete walls or kerbing. Routine (daily) checks will be made throughout the placement of materials to ensure that no sediment escapes the site. The materials accepted to the site are generally, low risk of silt release. The soils delivered are low in volume and are not deemed to pose a high risk of silt release.	Non existent

Proximity to environmental receptors	Air, run off	Habitats SSSI SINCs Watercourses Groundwaters Local designations and businesses etc	Medium	Due to the nature of the waste to be stored and how it is to be treated on site, there is a very limited potential pathway through air and wind dispersal that dusts and fumes may migrate towards the closest designations being at approximately: Milford Haven Waterway SSSI (along coast) approx. 1,610m away Scoveston Fort SSSI (to the northeast) approx. 1,130m away Ancient Semi Natural Woodland and Restored Ancient Woodland Site. Closest approx. 45m to the north of the site Waterston WwTW Inlet CSO- BH0073902 (upstream of site) Milford Haven Tank Storage- BK1341IN Milford Haven Energy- AP3136UA Secondary A Aquifer Designation (Bedrock) Watercourse to the north of the site at 65m Residential receptors- closest residential receptors approx. 215 to 376 meters from site	Due to the distance and direction from the site many of the receptors identified nearby would not have any impacts of either dust, smoke, fumes or water run off that would be created by the site in an incident/accident. However, the woodland at just 45m (closest) could potentially have dust impacts that my effect the amenity value of the area. Dust may also settle on the trees if left uncontrolled. Fumes may impact the neighbouring unit id plant was used for prolonged times. There is also a watercourse within the woodland (65m) to the North. If water were to somehow gain access to this watercourse from the site after an incident/accident then this could be potentially very damaging to the aquatic life within. Residential receptors are at closest, 215m away from the site in a South-westerly direction and 376m to the west. This is relatively close when considering airborne particles such as dust and smoke but water and run-off would not be considered an risk.	Due to the distance of the nearest SSSI from the site and the number of both natural and anthropogenic barriers between the locations; it is not foreseen that the activities at the site will adversely impact any environmental designations with the exception being the woodland to the North. Management practices and on site when treatment activities are being undertaken will ensure that impacts of dust etc leaving site are extremely low/non-existent and any impacts (if at all) would be negligible. In addition, being outside and therefore in the open air, the prevailing wind direction would generally take any airborne particulate away from the designations and receptors with quick dispersion rates. Run-off from the site has no physical pathway to the watercourse due to the distance and infrastructure constructed at the site. Dispersion of smoke etc will help dissipate the impacts on residential receptors located within 400m of the site also.	Low
Fire	Run off, air pollution	Local residents and other industrial estate users.	High	Due to the nature of the material to be accepted and with the increased treatment methods, there is always an increased risk of fire incidents on sites of this nature. Prolonged storage of stockpiled mixed wastes increases the likelihood of a fire. Lithium batteries could be accepted within the mixed C&D/HCI wastes, these are known to be fire starters on waste facilities and are of particular concern.	Fire is one of the potentially most devastating and high-profile incidents for a waste facility. The impact on the environment through firewater runoff and smoke releases are significant. The impact on businesses and local residents are also major, ranging from people having to close doors and windows to avoid smoke in their homes to potentially neighbouring businesses being lost due to the spread of a fire.	Compliance with the submitted Fire Prevention and Mitigation Plan (FPMP) will significantly reduce both the severity and likelihood of a fire on site. Please see the submitted FPMP for detailed mitigation measures that reduce the risk of a fire at the facility. The site has a comprehensive CCTV system and is fully enclosed by 8ft walls and fencing with locked gates after hours.	Medium-low

Accidents	Run off, air pollution, spills	Local residents/business, water courses and ground	Medium	Accidents of any type can occur on a waste as there are many different aspects that can go wrong. From spillages to crashes and plant breakdown and even acceptance of non-permitted wastes. These all have the potential to cause an accident.	Depending on the type of accident the impacts range from low risk to high. For example, a loading shovel reversing into a skip and breaking its radiator, is a minor issue and can be cleaned up quickly. However, a burst hydraulic pipe could leak and enter a drain to the watercourse or could catch fire and cause a significant incident.	Ensuring that all the correct and required PPE and pollution prevention kits are both on site and complete. All staff must be adequately trained to both recognise the impact of an accident and the effective use of deploying the clean-up equipment. All staff on site must follow the documented on site working practices to ensure the risk of an accident occurring is minimised as far as possible.	Low
Odour	Air	Local business	Medium	The site has the capability to accept wastes such as food that have potential to create odour when stored/processed. Mixed HCl wastes also could create odour when stored for long periods.	Odour has the potential to impact the amenity value to the local businesses on the estate.	No food wastes are to be processed on site at all. The processing to be added is only for the material that is classed as low risk of odour. The mixed HCl wastes accepted are generally house clearance etc and do not contain waste that is typically odour creating. On site reception checks would isolate this material if required before processing.	Low
Pests	Air, physical movement	Local Business	Medium	The addition of the new treatments, in particular shredding has the potential to increase the likelihood of pests (seagulls) at the site.	The attraction of pests can have a detrimental impact on the people working in the local area. Once attracted, their numbers increase each day unless the problem is fixed. Pests, in this case seagulls have the potential to cause a mess in the area and impact vehicles etc.	The processing of the material is only to occur sporadically. This will prevent the 'learned' behaviour of the pests as the processing is not daily. The site has installed a falcon pole that will be erected prior to any processing to deter seagulls from the waste during treatment. However, the agitating of the material will attract birds, so the risk remains to an extent.	Low

VOCs and bioaerosols	Air release as gas	Localised to employees and neighbouring unit only	Medium	The addition of the new treatment (shredding) may increase the risk the VOC release. The shredding of items such as carpets, furniture etc could increase the risk of VOC release. No paint and solvents are accepted. No new waste streams are to be added to the permit and so there is no increased risk from the actual wastes.	Prolonged exposure to inhalation of VOCs could have severe health impacts to site staff and those within proximity to the treatment area (neighbouring site).	Due to the length of time that the shredding will be occurring on site (very infrequently) and for only several days at a time, it is extremely unlikely that VOC emissions will be sufficient to cause any detrimental health impacts. Once the material has been shredded and restocked, the material is only there for up to 4 weeks prior to its removal. Bioaerosols are extremely unlikely to be created/released on site as this typically occurs through the breakdown of material. Due to the relatively quick turnaround of material on site, this is not likely to be a concern.	Low