

ENVIRONMENT MANAGEMENT SYSTEM

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

Version	Comments	Author	Status	Date
1.0	Creation of EMS to support the Bespoke Environmental Permit Application	AW	DRAFT	01/09/2025
1.1	Not duly made comment added	AW	DRAFT	21/01/2026
1.2	Not duly made comment additional comments added	AW	DRAFT	18/03/2026
1.3	Schedule 5	AW	DRAFT	10/07/2026
1.4	Amendments	AW	DRAFT	04/08/2026
//	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 the site is not active.

Contents

1 INTRODUCTION.....

1.1 The Site

1.2 Environmental Management System

1.3 Environmental Permit.....

2 SITE INFRASTRUCTURE PLAN

2.1 Site Infrastructure Plan

2.2 Drainage.....

3 SITE OPERATIONS.....

3.1 Operations

3.2 Waste Storage Plan.....

3.3 Fire Prevention Plan.....

3.4 Site specific processes, activities or operations.....

3.5 Emissions and discharges.....

3.6 Site engineering and infrastructure.....

3.7 Permitted activities

4 SITE AND EQUIPMENT MANAGEMENT

4.1 Equipment.....

4.2 Security.....

5 CONTINGUENCY PLANS

5.1 Waste Storage Quantity and Monitoring

5.2 Waste Storage Duration and Monitoring

5.3 Waste storage and drainage infrastructure.....

5.4 Waste treatment resulting in products.....

5.5 Wash Water Management.....

5.6 Transportation and distribution.....

5.7 Waste Hierarchy.....

5.8 Fire Action Plan

5.9 Flood Action Plan

5.10 Failure of Essential Equipment and Machinery

5.11 Severe Weather

5.12 Dust.....

5.13 Litter.....

5.14 Noise.....

5.15 Debris on road.....

5.16 Pests.....

5.17 Odour.....

6 ACCIDENT PREVENTION AND MANAGEMENT PLAN

6.1 Reviewing the Accident Plan

6.2 Contact Information for the Public.....

6.3 Complaints Procedure

7 STAFF COMPETENCY AND TRAINING RECORDS

7.1 Responsibility.....

7.2 Technical Competence.....

7.3 Training

8 KEEPING RECORDS

8.2 Reporting

8.3 Notifications.....

9 COMPLIANCE.....

9.1 Compliance checking

9.2 Compliance recording

9.3 Compliance Investigating

9.4 Compliance Resolution

10 CLIMATE CHANGE.....

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, Rhosyllen, LL14 4EG. The approximate national grid reference for the site is SJ 31322 48000.
- 1.1.3 The Colliery Lane site is situated 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 colliery 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

ENVIRONMENT MANAGEMENT SYSTEM

1.1.11 The site has several 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	Hafor 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 from Natural Resources Wales for the processing of colliery spoil wastes.

2 SITE INFRASTRUCTURE PLAN

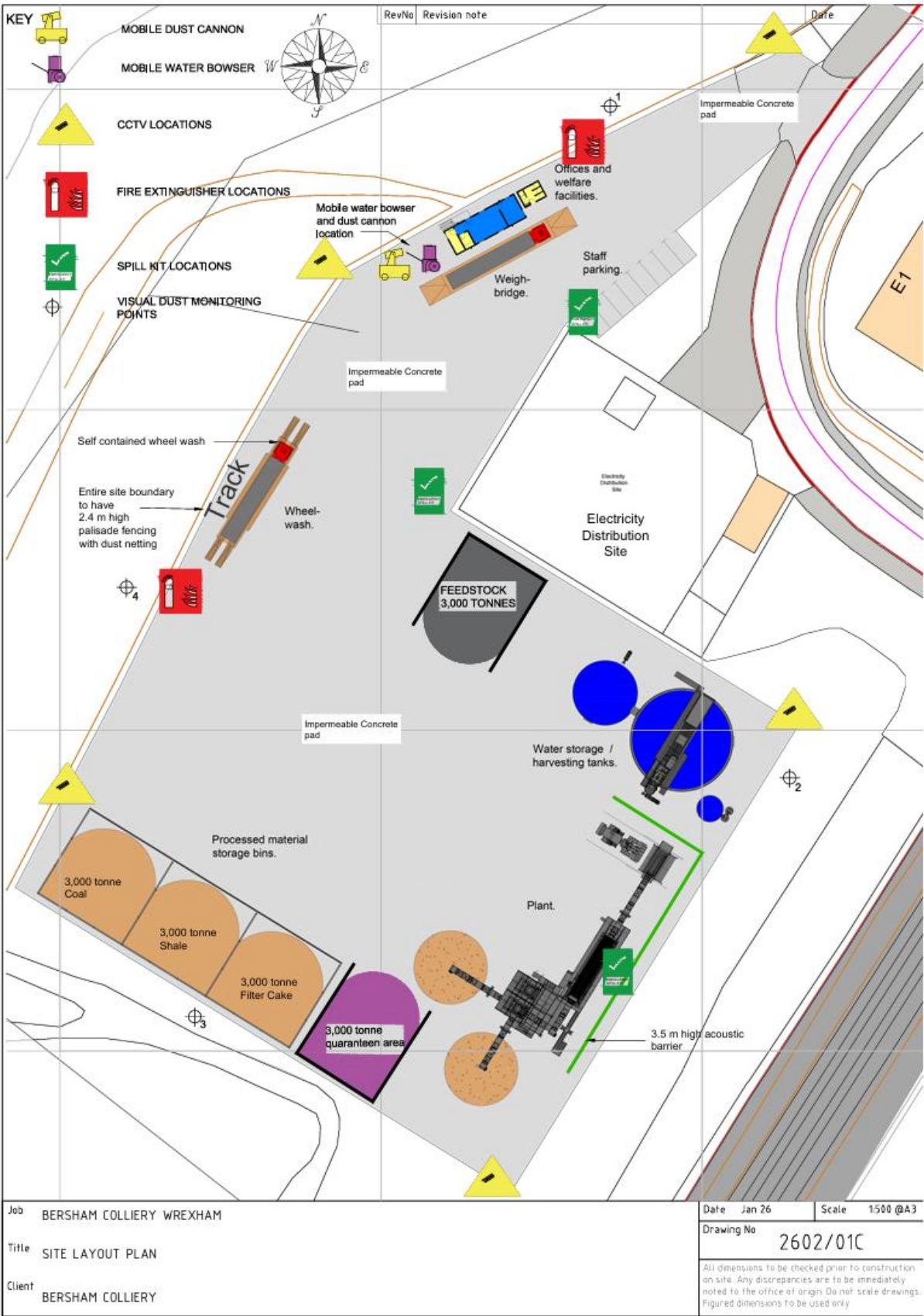
2.1 Site Infrastructure Plan

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).

ENVIRONMENT MANAGEMENT SYSTEM

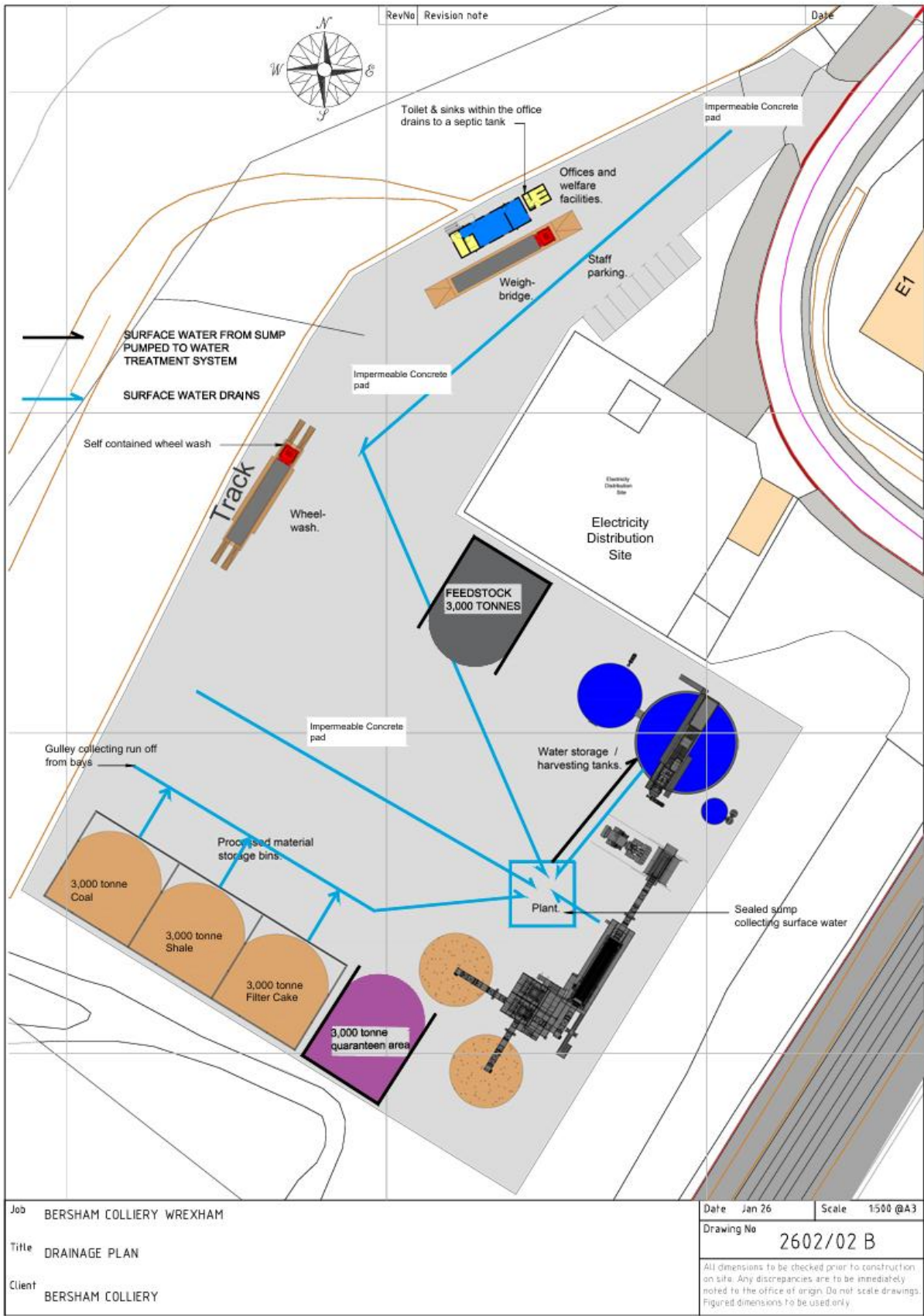
Site Layout Plan



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 gulleys 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 or a fire requiring water to be applied to it, 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.

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 and the EWC 01 01 02 for colliery spoil will always be the description given to the waste.

Once the colliery spoil has been excavated and transferred to the permitted site the following must take place –

- 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 visually assessed against its description on the waste transfer note (consistent with the wastes from the colliery tip).

Both staff who are excavating the colliery spoil and those working on the wash plant you will be receiving it will be trained in identifying visual contaminants such as but not limited to –

- Hydrocarbons
- Sheet asbestos
- Non-conforming Items (such as metal, plastic, cable and wood)

All of which could potentially contained within the colliery spoil and are not suitable for washing and would potentially make the waste classification different.

In the event that when the waste is visually inspected and visual contaminants are observed such as hydrocarbons, the following will take place –

- If the description requires changing this will be completed and the waste will be tipped in the quarantine bay.
- The quarantined waste will be reloaded and removed from site to a suitably permitted facility.

- Any quarantined loads or loads where the description has changed from the original waste transfer note will be noted in the site diary.

If when the colliery spoil is being dug from the colliery and it does not match the waste description or shows visual contaminants, the first instance would be for the waste not to be transferred to the permit and for it to be transferred to a suitable permitted waste facility.

Waste Assessment

The adjacent Bersham colliery tip that is the source of all the colliery spoil has been had numerous assessments of the waste and its characteristics leading to its description of EWC 01 01 02 for colliery spoil.

However, the site will conduct regular waste analysis to ensure the waste is consistent.

The plant can wash a total of 3,000 tonnes per day; initially weekly samples or every 15,000 tonnes will be sampled.

If the waste remains consistent the testing will be reduced to a lesser frequency.

In the event of waste testing identifying properties that would result in the waste being classified as hazardous the testing will revert to weekly until it is clear the failed sample was an anomaly.

Failed samples would also inform additional wash water and filter cake samples to ensure the contaminants have not been passed to the washing process.

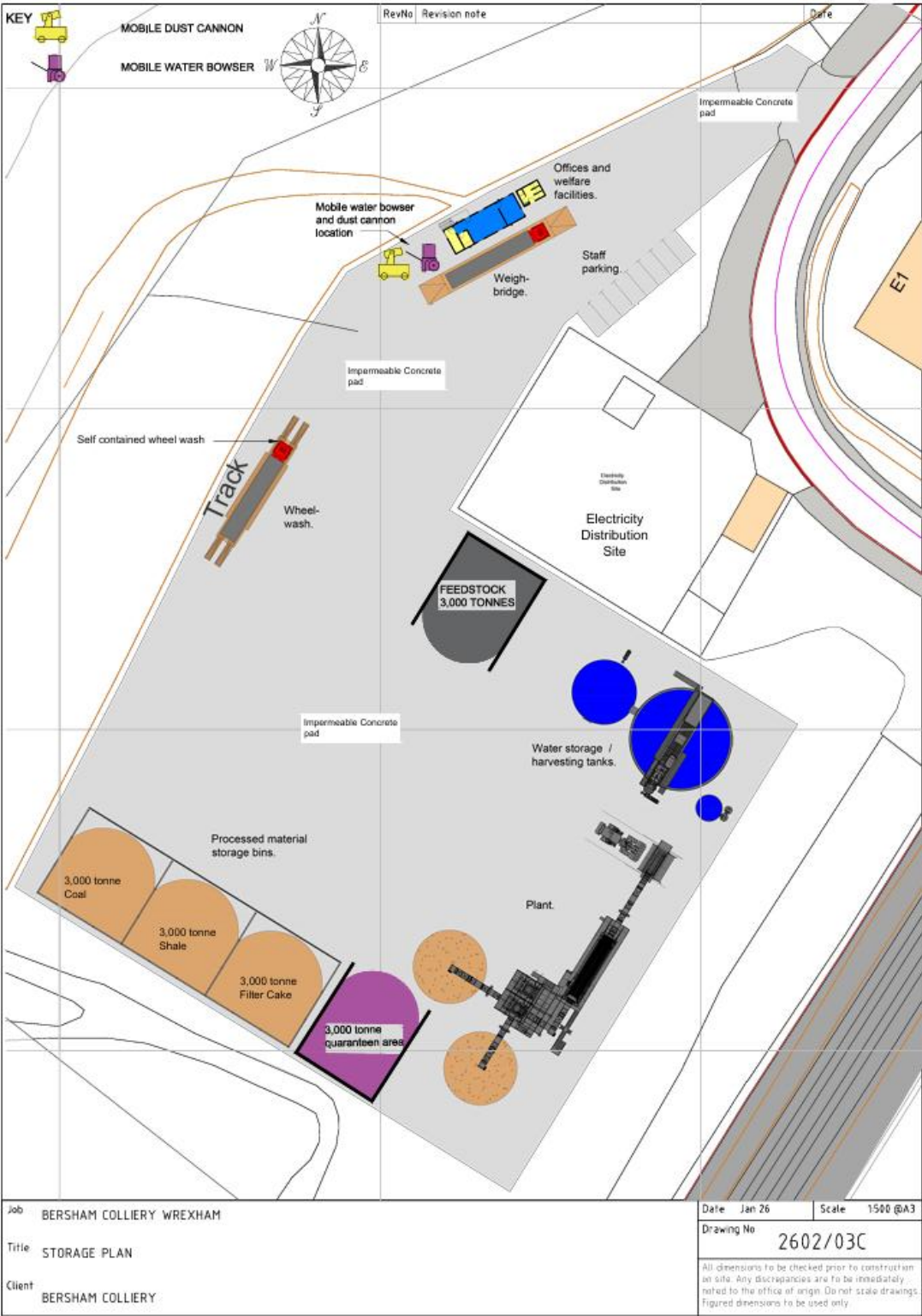
Waste Transfer

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 form the colliery being stored in waste bays awaiting processing. These are shown in on the waste storage plan.



ENVIRONMENT MANAGEMENT SYSTEM

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	3,000	Loose	Stockpile	5m
Coal	19 12 12	1 month	3,000	Loose	Bay	5m
Filter cake	19 02 06	1 month	3,000	Loose	Bay	5m
Shale / aggregates	19 12 12	1 month	3,000	Loose	Bay	5m
Quarantine waste	Variable	1 month	3,000	Loose	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.
- 3.2.9 Generated filter cake created from the wash water treatment process will only temporarily be stored on site pending removal to another suitable permitted facility.

Controlling waste types

- 3.2.10 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 delivered 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.
- 3.2.11 The site diary is located and stored within the site office.

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' aggregate 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 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 (see appendix for daily maintenance / inspection checklist) once the plant is commissioned a full maintenance schedule will be created by the manufacturer and staff trained in maintenance.
- 3.6.3 All damage or wear will be recorded and fixed.
- 3.6.4 The Site Manager 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 manager 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 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 fence will also be covered in its entirety with dust netting to prevent dust and litter migration from the site past the boundary.
- 4.2.3 The site will also have an extensive CCTV system that covers the whole operation to aid with the prevention of break ins and vandalism.

4.2.4 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 Twice daily the stockpile heights will be formally checked via the site inspection form both AM and PM.
- 5.1.6 If there was no suitable waste storage on site, waste would either not be allowed to enter the permitted area.
- 5.1.7 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.

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 Waste Treatment Resulting in Products

The waste colliery spoil that is treated in the wash plant is to be separated into different fractions including coal and aggregates.

However, these fractions will remain a waste until it has been demonstrated that they meet End-of-Waste due to its qualities and consistency.

End of waste can normally be demonstrated by one of three methods:

- Compliance with end of waste regulations
- Meeting a quality protocol
- Through an individual assessment on a case-by-case basis.

Until such a time where the material has met End-of-Waste it must be handled, stored, treated as a waste in line with the environmental permit and its associated conditions.

Once the site is operational and producing recycled fractions the process of gathering samples and associated results can start to gain evidence for End of Waste.

If the above is not demonstrated then the fractions will remain waste and have to be moved from the site to suitably permitted facilities and subject to Duty of Care.

5.5 Wash Water Management

There is a misconception that wash waters degrade as they continually loop around the process. This is not true. Because wash plants move water daily through a combination of moisture being retained in the washed coal and aggregates, evaporation from the wash materials and from the concrete pad and moisture retained within the filter cake.

ENVIRONMENT MANAGEMENT SYSTEM

In normal operating conditions due to the constant topping up of the wash waters and contaminants being transferred from wash waters to filter cake There should not be the requirement to replace 'spent' wash waters.

The filter cake is created by pressing water out of the thickened sludge and the sludge is created by binding suspended solids freed from the washed material with the flocculant.

However, there is the potential for contamination within the wash water from hydrocarbons which could potentially enter the system unintentional. If there was a Sheen observed from fuel or oil in the wastewater system the plant would be stopped an arrangement made for the system to be drained down.

Also, the site will carry out periodic monitoring of the wash water to understand the plant's performance and efficiency, This would include the number of parameters being tested including –

- Ph
- Temperature
- Suspended
- Conductivity

In addition to these standard parameters some of which are constantly monitored by the plant additional tests will be carried out for the presence of toxic heavy metals and hydrocarbons.

If levels of contaminants are found within the wash water That suggest the plant is not working efficiently or that the contaminants could be passed on to washed coal or shale, then as the same as with oil being detected the plant will be closed and the system drained down.

At this point the spent wash water as well as any thickened sludge that had not been processed would be removed from site via tankers to a suitably permitted waste facility.

This would also provide the opportunity for the plant to be cleansed with fresh water Again this would be removed from site to a suitably permitted waste facility.

And at the point of the plant being cleansed and free from water and sludge Detailed internal inspection of tanks Probably carried out and recorded and only repairs and maintenance can take place.

Which is also noted that the plan will need to be drained and cleansed for maintenance and the same process as it will be carried out.

The washed coal, aggregates and filter cake will also be sampled initially on a weekly basis, But this will reduce to monthly possibly quarterly if they are free from contaminants.

If there is a failure for example with the filter cake contained levels of contaminants that meant it was would be classified as hazardous, both filter cake, coal and wash water testing frequencies would increase to understand if this was an isolated. Incident.

The process of draining the tank and cleansing it will be carried out on the impermeable concrete surface forming part of sealed drainage system.

ENVIRONMENT MANAGEMENT SYSTEM

Prior to any cleansing or draining the sump will be cleared of any water first and this will be removed from site to a suitably permitted facility Meaning that any spills during the draining and cleaning process Or drag to the sump where they again can be pumped from and removed from site.

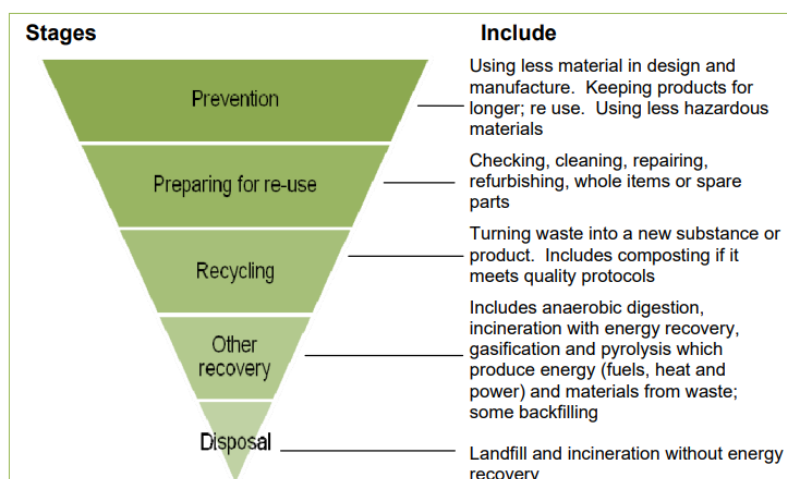
If the site is expected to be handling spent wash water you will need to update the EMS and risk assessment on how the site will manage or dispose of these waters while also outlining the mitigation measures that will be in place to reduce the risk of leaks and spills to the wider environment.

5.6 Transportation and distribution

- 5.6.1 All loads coming to the site will be in dumper trucks direct from the adjacent former Bersham Colliery tip.
- 5.6.2 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.

5.7 Waste Hierarchy

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



5.8 Fire Action Plan

5.8.1 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.

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

5.8.3 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.

5.8.4 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.

5.8.5 Staff training:

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

- 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.

5.9 Flood Action Plan

5.9.1 According to the Natural Resources Wales 'Flood Map for Planning', the site is not located in Flood Zone.

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

5.9.3 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.



ENVIRONMENT MANAGEMENT SYSTEM

5.9.4 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.

5.4.6 During heavy rainfall the site may be susceptible to surface water flooding due to the fact it operates a sealed drainage system.

During heavy rain surface water that is captured drain to the sites sealed sump, during operational times some of this water will be pumped to the wash plant to continue to top up the wash plants wash waters. However, if there is too much surface water alternative action will have to be taken.

5.4.7 The company has the details of several tankering businesses who can attend and remove surface water from the sump and transfer it to a suitably permitted waste facility.

5.4.8 During non-operational hours due to the site being under constant CCTV coverage and monitoring of rainfall data arrangements can be made to manage surface water out of hours in the above process.

5.4.9 in the unlikely event of surface water flooding plant and equipment will not be impacted as the wash plant itself is built for a wet environment and sits on stanchions and the site cabin will be raised on levelling legs.

5.10 Failure of Essential Equipment and Machinery

5.10.1 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).

ENVIRONMENT MANAGEMENT SYSTEM

- Notification to be made to Natural Resources Wales using the Schedule 5 notification form in the environmental permit.

5.10.2 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.

5.11 Severe Weather

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

5.11.2 Dry stockpiles, i.e. soils, will be dampened, and following evaluation of the severity of the conditions stockpile heights could be reduced.

5.11.3 Movement of dry material will be avoided during these conditions.

5.11.4 In the event of extreme cold there is the potential for the wash plant to freeze.

5.11.5 Staff training:

- All existing staff will be trained in this procedure.
- All new staff will be trained within 2 months from commencing employment.

5.12 Dust

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

5.12.1 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.

5.12.2 The sites surface is made of concrete which is easy to clean and removed dust and debris from.

5.12.3 A water bowser is available to allow site surfaces to be damped down in dry weather.

ENVIRONMENT MANAGEMENT SYSTEM

- 5.12.4 Hand hoses can also be used to dampen down roads and stockpiles.
- 5.12.5 In the event of excessive dust on road surfaces a mechanical road sweeper will be hired in.
- 5.12.6 Good housekeeping is essential and an individual is tasked with removing loose litter and debris for the site daily.
- 5.12.7 The sites mechanical road sweeper will be deployed on a daily basis.
- 5.12.8 In high winds activities that could spread dust and particulates are ceased this included loading and unloading waste from vehicles potentially dusty wastes.
- 5.12.9 Where possible vehicles that are covered or are enclosed are used to transport waste to and from the site.
- 5.12.10 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.
- 5.12.11 All mobile plant, equipment and generator will run on diesel. These vehicles will be fitted with diesel particulate filters.
- 5.12.12 All vehicles are inspected and maintained inline with manufacturers guidelines to ensure that they run efficiently and correctly.
- 5.12.13 All mobile plant, equipment and generator will be of the latest EURO 6 standard to ensure emissions from exhausts are as low as possible.
- 5.12.14 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.
- 5.12.15 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.
- 5.12.16 Fuelling of mobile plant, equipment and generator will be carried out when required with diesel tanks open for as short a period as possible.
- 5.12.17 Any leaks will be fixed immediately. All spills will be cleaned up immediately.

5.13 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.
- 5.13.2 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.
- 5.13.5 All incoming and exporting waste vehicles will be covered.
- 5.13.6 The site shall be inspected daily by the site manager, and any litter or accumulated debris shall be dealt with immediately.
- 5.13.7 Events that have led to excessive dust releases and activities and as a result activities have ceased will be noted in the site diary.
- 5.13.8 Any complaints will be actioned in accordance with the site complaints procedure and recorded in the site diary

5.14 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.
- 5.13.5 Large noise events will be noted in the site diary.

ENVIRONMENT MANAGEMENT SYSTEM

- 5.13.6 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.
- 5.13.7 The site will operate under the recommendations of the conclusions of the submitted NIA i.e. the construction of the noise bund and noise abatement fencing around plant etc, operations will not commence until these are in place.
- 5.13.8 The noise bund is constructed of existing in-situ material and is not imported and as a result a deposit for recovery permit is not required for the noise bund.

5.15 Debris on the road

- 5.15.1 All site internal roads will be kept free from debris.
- 5.15.2 In the event of excessive debris on road surfaces a mechanical road sweeper will be deployed.
- 5.15.3 If the debris are likely to give rise to dust the surfaces will be dampened down.
- 5.15.4 If excessive amounts of debris have been identified on the road the details will be noted in the site diary.
- 5.15.5 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.

5.16 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.

5.17 Odour

- 5.15.1 The site does not accept any odorous wastes.

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
SPILLAGES			
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/
FAILURE OF OR ACCIDENT TO PLANT OR EQUIPMENT			
Fuel leak.	Contamination of land, groundwater and watercourses.	Daily visual inspection Preventative maintenance regime. Following an accident, visual inspection.	Spill Kit – follow manufactures instructions
FAILURE OF SERVICES and EQUIPMENT, MACHINERY, VEHICLES			
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.
FAILURE OF CONTAINMENT			
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.
VANDALISM			
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.

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 Natural Resources Wales;
 - The permit number; and
 - Natural Resources Wales 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

- 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.

STAFF COMPETENCY AND TRAINING RECORDS

6.4 Responsibility

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

6.5 Technical Competence

- 6.5.1 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.
- 6.5.2 There will be several technically competent managers within the company and there is always a minimum of one on site.
- 6.5.3 Attendance of the technically competent managers will be recorded in the site diary.

6.6 Training

- 6.6.1 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.
- 6.6.2 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.
- 6.6.3 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.
- 6.6.4 Bersham (Glenside) Ltd will be 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.
- 6.6.5 The sites training needs will be annually reviewed and updated within a training matrix.
- 6.6.6 Training for the use of the plant and equipment will be provided by the manufacturer and records retained on site.

7 KEEPING RECORDS

7.1.1 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.

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

7.1.3 A site diary and daily site checklist will be kept recording the following:

- Accidents;
- Incidents / emergencies on site;
- Site inspections (by Natural Resources Wales 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.

7.1.4 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.

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

7.2 Reporting

- 7.2.1 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.
- 7.2.2 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.
- 7.2.3 Copies of notifications of incidents, accidents and complaints made to Natural Resources Wales as a notification will be retained for 6 years.

7.3 Notifications

- 7.3.1 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.
- 7.3.2 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.

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 in line 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.

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 because 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.

APPENDIX 1: COMPLAINTS FORM

Complaint Report Form	
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. ○ What does it smell like? ○ What does it sound like? ○ What pests? ○ Level of dust?	
○ Intensity (see below for odour):	
○ Duration (length of time):	
○ Constant or intermittent in this period:	
○ 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

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

Intensity

- | | | |
|--------------------|------------------|--------------------------|
| 0 No odour | 3 Distinct odour | 5 Very strong odour |
| 1 Very faint odour | 4 Strong odour | 6 Extremely strong odour |
| 2 Faint odour | | |

EMS

V1.4 /EMS/ 04/08/2026

ENVIRONMENT MANAGEMENT SYSTEM

Daily Inspection / Maintenance Sheet – Bersham Glenside v1.0	
Date	Name
Time	Signature

Item	AM	PM	Item	AM	PM
Wash-plant			Mobile plant – Loading shovel		
Guards and warning decals			All beacons and lights		
Steps and platforms			Wheels and tyres		
All beacons and lights			Seal belt		
Re-torquing of bolts			Water bowser		
Greasing points			Pump and hoses		
Oil levels			Water tank		
Scrubbers and trommels			Dust Cannon		
Screen decks			Pump and hoses		
Log washers			Water tank		
Hydro-cyclones			Wheel wash		
Screens			Pump and hoses		
Pumps			Water level		
Hoses			Working correctly		
Paddles			Site infrastructure		
Filter Press			Concrete pad		
Waste water tank			Drains and sumps		
Loading hopper			Fence and gates		
Sludge thickening tank			Waste bays		
Electrical wiring			Site signage		
Flocculant levels			Site lighting		
Build-up of waste			Floor makings		
Wash water levels			Spill kit in place		
Clean water feed			First aid kits		
Mobile plant – Loading shovel			Fire extinguishers		
Guards and warning decals			Tools – shovels and brushes		
Steps and platforms			Waste storage heights / volumes		
Comments from inspection					
Actions taken					

