

GARY CATTON HAULAGE LTD

MANAGEMENT SYSTEM

**Materials Recycling Facility -
Glasfryn Yard, Weighbridge Road, Deeside
Industrial Park CH5 2LL**

Version 2.0 - 28 April 2020

Prepared by:



Oaktree Environmental Ltd

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Appendix I - Drawings:

Drawing No. 2632/321/01	-	Site Location Map
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Appendix II - Record Keeping Forms

RF/1	-	Waste Input Record Form
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RF/5	-	Visitors log
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RF/20	-	Plant Maintenance Schedule

Appendix III – Environmental Permit including waste types

Appendix IV - Health and Safety - Conditions of site use for staff and visitors

Appendix V - Accident Management Plan

Document history:

Document Versions	Issue date	Status	Completed by	Revisions/comments
1.0	26 March 2013	Application copy	Jan Edwards	N/A
2.0	28 April 2020	Periodic review	Marco Muia	Pamela Roberts' review.

1.0 GENERAL CONSIDERATIONS

1.1 Site operator/permit holder

1.1.1 Gary Catton Haulage Limited are applying for and will hold and operate the Environmental Permit for their site to process dry, inert and non-hazardous, construction, demolition and excavation waste to produce soil, soil substitutes and secondary aggregates. The site will only receive waste from in-house operations and other known contractors.

1.1.2 The rise in landfill costs through the introduction of the landfill tax has increased the need for construction companies to recycle the waste they produce and recycling/recovery operations are therefore needed to turn wastes into re-useable products. Waste delivered to the site will usually be contained within fixed body vehicles as the operator does not encourage the deposit of skipped waste on site. The site will not be open to, or for use by, the general public.

1.1.3 The address and contact details for **Gary Catton Haulage Ltd** are as follows:

Gary Catton Haulage Ltd, Glasfryn Yard, Weighbridge Road, Zone 4, Deeside Industrial Park, Flintshire CH5 2LL

Contact: Pamela Roberts **Position:** Site Manager
Tel: 07812 731684

Contact: Dave Evans **Position:** Site Manager /TCM
Mobile: 07831 800266

1.1.4 Oaktree Environmental Ltd have been engaged to act as consultants for Gary Catton Haulage Ltd to assist in the preparation of this Management System. This Management System has been prepared to meet the requirements of The Environmental Permitting (England and Wales) Regulations 2016.

Contact details for Oaktree Environmental are as follows:

Oaktree Environmental Ltd **Contact:** Marco Muia
Lime House **Position:** Managing Director
2 Road Two **Tel:** 01606 558833
Winsford Industrial Estate
Winsford **E-mail:** marco@oaktree-environmental.co.uk
Cheshire CW7 3QZ

1.2 Site history

1.2.1 The site is located in Zone 4 on the Deeside Industrial Park, approximately 10km north-west of Chester. The site was previously used as a transport depot and a storage depot for mobile loos. The national grid reference for the site is SJ 3091 7096. The applicant currently rents the site. Surrounding land uses are mixed heavy and light industrial. The site surface is approximately level and comprises areas of stone and tarmac hardstanding.

1.3 Permit area/waste management operations

1.3.1 The area which is the subject of the Environmental Permit is outlined in green on Drawing No. 2632/321/02. All references to 'the site' in this Management Plan shall mean this area (Materials Recycling Facility) and the associated infrastructure, plant and equipment. The site consists of a long narrow strip of land located between Tata Steel works to the south, the GDF power station to the north-east, UPM paper mill to the north-west and an industrial building and grounds used for servicing and maintenance of vehicles on land to the south east. With the exemption of the area of land occupied by Air Products which shares the application site's north-western boundary, the majority of the land immediately to the west of the site is undeveloped and consists of marshy terrain.

1.3.2 The location and operational elements of the proposed operations comply with the Standard Rules Environmental Permit for Treatment of waste to produce soils, soil substitutes and aggregates (SR2008No11). A copy of the Standard Rules are included in Appendix III of this document.

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

- Compacting (by loading shovel or grab).
- Sorting (with loading shovel, 360⁰ excavator with grab/bucket or by hand).
- Screening (by using appropriate mechanical screening plant and equipment).
- Separation (by using appropriate mechanical screening plant and equipment).
- Crushing (by mobile Crusher).

1.3.4 Specified waste management operations include waste disposal and waste recovery operations listed Annex IIA and IIB of The Waste Framework Directive 2000/442/EEC. They are listed in summary below:

- R3: Recycling or reclamation of organic substances
- R5: Recycling or reclamation of other inorganic materials
- R13: Storage of waste pending recovery

1.4 Hours of operation

1.4.1 The site will be operated during the following times for all waste operations, i.e. depositing, sorting, moving, storing and removing waste:

Monday to Friday	7.00 am to 18:00
Saturday	7.00 am to 14:00
Sundays, Bank/Public holidays	Only open for essential maintenance of plant and machinery.

During times where the site is closed or not in operation, the site will be locked and secured to prevent unauthorised access.

1.5 Waste types and quantities

1.5.1 The waste types will be dry, non-hazardous construction/excavation waste arising from local construction, excavation and demolition operations and as defined in the Controlled Waste (England and Wales) Regulations 2012.

1.5.2 A detailed breakdown of the waste types accepted at the site are given in the standard rules permit (SR2008No11) which is included in Appendix III.

1.5.3 No hazardous wastes or clinical or liquid wastes will be accepted.

1.5.4 A maximum of 35 loads will be tipped at the site in any one working day.

1.5.5 The throughput of the site will be to a maximum of 700 tonnes per day and <75,000 tonnes per annum. Notwithstanding the daily limit the following storage limits will apply:

<u>Waste type</u>	<u>Max duration of storage</u>	<u>Maximum quantity stored</u>
Construction/excavation waste	12 months	40,000 tonnes
Waste listed under Table 2.4 of SR2008No11	6 months	10,000 tonnes
Rejected waste	5 working days	< 2.0 tonnes

1.5.6 If more than 2 tonnes of waste is rejected it will be removed from the site immediately.

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

1.5.8 Stockpiling of wastes and/or reclaimed materials will be limited to 10 metres in height.

1.6 Staffing and management

1.6.1 The site will open for the deposit of waste or for other essential operations during the hours listed in Section 1.4. The list below details the staff structure of the site when operating at full capacity. Positions in bold italic print below are the minimum staff requirements when the site is open for the reception of waste:

<u>Position</u>	<u>No.</u>	<u>Responsibilities</u>
Site Manager	2 (<i>1</i>)	Overall site management (TCM)
Machine/plant operator	2 (<i>2</i>)	Waste handling/processing, reception and plant operation

1.7 Health and safety

1.7.1 All operations on site will be carried out in accordance with the relevant requirements of the Health and Safety at Work Act 1974. Conditions of site use for employees, visitors and contractors are attached to this Management System as Appendix IV. These conditions will be shown to all site users and must be signed prior to using the site. Anyone refusing to comply with the conditions of use will be asked to leave the site.

1.8 Fit and proper persons

- 1.8.1 Technical competence - The site's Technically Competent Manager is currently Dave Evans. Pamela Roberts is also undertaking assessment for the MROC1 award.
- 1.8.2 The COTC holders will be required to enter their time spent on site in the site diary. The required managerial cover is a percentage of the site's operational hours based on the site's OPRA score calculated by the Natural Resources Wales. Any changes to the site management will be notified to the Agency within 5 working days, naming the new manager or person providing the cover.
- 1.8.3 Relevant convictions - At the time of application, neither Gary Catton Haulage Limited nor any of the relevant people within the company had been convicted of a relevant offence.

2.0 SITE ENGINEERING AND INFRASTRUCTURE

2.1 Access and parking

2.1.1 Access is gained via the A548 and Weighbridge Road which leads directly to the site access, as shown on Drawings No. 2632/321/02 and Drawing No. 2632/321/03. Provisions for staff and visitor parking will be provided on site.

2.2 Notice board and signs

2.2.1 A notice board has been erected at the site entrance and will display the following information:

- The site name and address.
- The name of the permit holder and operator.
- The Environmental Permit number and accompanying statement stating that the site is permitted by Natural Resources Wales.
- Natural Resources Wales' contact details – Tel: 0300 065 3000.
- Operator's "out of hours" emergency contact details (telephone number).
- Operating hours.

2.2.2 Additional signs will be displayed around the site for operational / health & safety purposes. All staff and visitors will be required to comply with the requirements of all signs whilst on site.

2.3 Site security

2.3.1 The site has lockable entrance gates and fencing to prevent unauthorised vehicular and pedestrian access during any times when the site is not in use.

2.4 Site office

2.4.1 There will be a site office on the site. Staff welfare facilities will also be provided on site.

2.4.2 The table below details the relevant site documentation which will be kept in the main site office.

Documents to be retained in site office
The Environmental Permit (original)
The Management System (agreed document)
Current site diary (to record all inspections/visitors to the site).
Natural Resources Wales inspection forms
In-house inspection sheets/recording forms
Duty of care transfer notes (for 2 years minimum)
Waste delivery tickets
Accident book (& First aid kit) & Health and Safety Documentation

2.5 Fuel storage

2.5.1 Any fuel tanks which are stored on site will be surrounded by a bund capable of containing a minimum of 110% of the volume of fuel stored in the tank. All pipework and associated infrastructure will be enclosed within the bund. A lock will be fitted to the tank valve to prevent unauthorised operation. All valves and gauges on the bund will be constructed to prevent damage caused by frost. The tank will be clearly marked showing the product within and also its capacity.

2.6 Weighbridge

2.6.1 The site has a weighbridge for accurate recording of weights, of waste loads delivered to the site and also be used for weighing outgoing loads of recycled materials and/or wastes destined for further processing.

2.7 Wheel wash facility

2.7.1 The fact that the main vehicle running surfaces are hard surfaced and the location of the site reduces the likelihood of mud or debris being carried onto the public highway.

2.7.2 A water hose will be provided to permit the effective spraying of the whole site surface to help limit dust and mud tracking off site.

2.8 Waste storage areas

- 2.8.1 Proposed locations for waste reception, processing and storage of the construction/excavation wastes and product are marked in Drawing No. 2632/321/03.
- 2.8.2 A clearly labelled 8 cubic yard (or similar) enclosed skip will be provided for the deposit of rejected waste which cannot be removed from the site immediately. The location of this skip may be varied as operating conditions permit (i.e. to permit the loading of rejected wastes but clear labelling and management control will ensure its use as specified).

2.9 Drainage

- 2.9.1 The small part of the external yard area which is surfaced with hardcore or compacted stone and will drain naturally to ground. The majority of the site area is surfaced with concrete and tarmac and drains into the existing drainage system serving the adjacent land belonging to Tata Steel UK Ltd.

2.10 Vehicles, plant and equipment

- 2.10.1 Waste will be handled using the plant listed below. Additional plant will be hired to cover any very busy periods. Only trained operators will be permitted to drive/operate the plant listed below. Any changes to the list will be notified to Natural Resources Wales.

<u>Type of plant/equipment</u>	<u>No.</u>	<u>Function</u>
360° tracked excavator	2	loading/unloading/movement/sorting
Mobile Crusher*	1	crushing of C&D waste material
Power Screen	1	screening C&D waste
Loading shovel	1	general site operations
Water bowser (or similar)		Dust suppression

Note: The plant/equipment on site will vary depending on the amount of waste to be processed/treated.

* Mobile crusher may be hired in under Local Authority Part B Authorisation.

3.0 SITE OPERATIONS

3.1 Preliminary procedures

3.1.1 Guidance will be given by the site management to all employees, sub-contractors, other waste carriers and customers regarding the waste types and operations which are acceptable at the site i.e. a copy of Appendix III of this document. Details of third-party waste carriers will be checked prior to delivery of waste. The procedures below are followed prior to the receipt of waste on site.

3.1.2 Pre acceptance criteria

For the protection of the operator and to ensure compliance with the permit conditions prior to acceptance on site, waste consignments are checked to demonstrate they are suitable for importation into the site's recycling facility. Relevant documentation including details on origin and description of the waste and where relevant, test data, will demonstrate if the material is acceptable. To ensure that only clean loads are accepted the following information will be requested from waste producers (if relevant) at the start of each contract to ensure compliance with the requirements (basic characterisation of the waste).

- (i) A site investigation report, including borehole logs (if available).
- (ii) Waste analyses (if available), including leachability tests.
- (iii) Name and address of the site from which the waste was excavated/produced.
- (iv) Detailed waste description, including EWC code and transfer note.

3.2 Checking in & inspection of loads

3.2.1 All incoming vehicles are required to report to the main site office. The details of the load will be recorded and the Duty of Care transfer note and company documentation will be further checked by the operator to ensure that the load is acceptable at the site. Any deviation from these procedures or problems with any loads will be reported to the site manager.

3.2.2 Once a load has been accepted by the operator the driver will be asked to unsheet the vehicle (if it is sheeted) and a visual inspection of the contents will be carried out to ensure that the waste types comply with the Environmental Permit. The nature of mixed construction/demolition can sometimes make full inspection difficult until the load is deposited. If rejected waste is discovered before deposit, the load will be rejected by the operator and disposed of at an approved facility. In cases where the presence of unauthorised waste is likely to lead to a breach of permit conditions, Natural Resources Wales will be contacted immediately to agree a course of action.

3.2.3 If the load is acceptable the driver will be instructed to deposit it within the processing area. If the load is unacceptable after deposit it will be loaded back onto the delivery vehicle, or stored until it can be taken to an approved facility to be disposed of. Otherwise Natural Resources Wales will be contacted and the load will be taken to a

suitably permitted or exempt site.

3.2.4 The weight of incoming loads will be determined using the weighbridge found next to the main site office.

3.2.5 Waste will predominately be delivered to the site in eight-wheeled wagons.

3.3 Waste deposit, handling and storage

3.3.1 Once a load has been accepted by the operator the contents of the delivery vehicle will be discharged into the appropriate storage area in accordance with the following procedures:

- i. Soils will be stored prior to screening for production of soil product and then sold to the commercial market
- ii. Stone and concrete etc will stored prior to be crushed using mobile plant to produce recycled aggregates for the construction industry.
- iii. Non-conforming wastes will be separated and stored in rejected waste skips awaiting removal to approved facilities

3.3.2 Rejected wastes will be deposited in the skip provided for non-conforming wastes. This will occur when non-conforming waste is discovered after the deposit of a load or where the removal off-site of the waste may cause further problems. The Natural Resources Wales will then be contacted to agree a course of action where necessary. The contents of the skip will be recorded in the site diary.

3.3.3 When a collection vehicle arrives at the site the driver will be instructed to report to the site office or the machine/plant operator. All relevant documentation will be completed and the vehicle will be passed to pick up the load and take it to the designated recycling/disposal site. The product or waste will be loaded using the loading shovel.

3.4 Record keeping

3.4.1 The details below will be recorded on a combination of the record keeping forms listed in Appendix II, invoices and the site diary.

3.4.2 Records will be kept in paper and electronic format.

3.4.3 The following details will be recorded for every load deposited at the site (RF/1):

- (i) The date and time of delivery.
- (ii) The name and address of the site where the waste came from.
- (iii) The type and quantity of waste (in tonnes or cubic metres).

- (iv) Driver's name, signature and vehicle registration number
- (v) Signature or initials of person accepting/inspecting the waste.
- (vi) Additional handling details/notes made by the driver after inspection of the load.

3.4.4 The following details will be recorded for every load of waste leaving the site (RF/3):

- (i) The date and time of removal.
- (ii) The type and quantity of waste (in tonnes or cubic metres).
- (iii) The destination waste management site or exempt facility
- (iv) The name and registration No. of the carrier or employee removing the waste (if applicable) and vehicle registration number.

3.4.5 A summary of waste types and quantities deposited at and removed from the site and origin and destination details will be forwarded to Natural Resources Wales using the standard waste return form within one month of the end of each quarter as specified in the site's Environmental Permit.

3.4.6 Outcomes of inspections of waste types, hardstanding areas, transfer/treatment areas, storage areas, etc., will be recorded onsite inspection form RF/4 and detailed comments will be entered into the site diary (including action taken or proposed).

3.4.7 Visitors to the site will sign the visitor's book upon arrival and exit stating the purpose of their visit and whom they represent (RF/5).

3.4.8 Complaints will be recorded on form RF/7 (see section 4.9).

3.5 Preventative maintenance

3.5.1 All items of plant and vehicles are subject to preventative maintenance checks to ensure their safe operation and to prevent any potential situations which may give rise to adverse impacts on the environment.

3.5.2 Much of the plant and equipment on site and all vehicles in the fleet are subject to regular maintenance to ensure proper working order in the form of service contracts. Site management will undertake or delegate additional preventative maintenance checks on a more frequent basis to ensure, where possible, the machinery is mechanically sound. These checks will be carried out using the preventative maintenance checklist given as RF/11 in Appendix II and any results which are flagged as needing attention will also be recorded in the site diary.

4.0 ENVIRONMENTAL CONTROL, MONITORING AND REPORTING

4.1 Breakdowns and spillages

- 4.1.1 In the event of breakdown of the loading plant an alternative machine will be brought on site until it is repaired. If an alternative machine cannot be used then waste will be stored securely until the plant is repaired. The repair will be carried out at the most convenient location with absorbents used to clear oil or fuel spillages.
- 4.1.2 All site surfaces will be inspected daily when the site is in operation. Debris will be swept as required and placed in a skip for disposal to a suitably permitted site.
- 4.1.3 Any spillages of fuel/oil will be cleared immediately by depositing sand or absorbents from the spill kit on the affected area. The sand or absorbents will be placed in a skip to be taken to a suitably permitted site for disposal. All spillages of waste and windblown litter will be cleared by the end of the working day in which they occur. Spillage clearance procedures are detailed in Section 5.3. Sand and absorbents will be stored on site.
- 4.1.4 All wastes liable to give rise to contamination will be removed from the site if the site is not secure or if operations cease or are temporarily suspended.

4.2 Site inspections and maintenance

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

4.3 Control of mud and debris

- 4.3.1 Vehicles will be visually inspected before exit to check that loads are safe and that no mud is carried out on the wheels or body of the vehicle. Visual inspections of the site roads are carried out daily (see RF/4), however, staff will report any problems with mud or debris on the site roads immediately to the site manager.
- 4.3.2 The deposit of material on the public highway will be treated as an emergency and will be cleared immediately by the operator using suitable plant. However due to the distance of the application site to the main highway it is not likely to be an issue. Silt will not be washed into roadside drains or gullies.

4.4 Control and monitoring of dust

- 4.4.1 Site operations will be carried out to minimise the creation of dust. A water supply for dust suppression measures will be provided on site will be used to spray the site surface and the waste stockpiles to prevent the formation of excessive dust.
- 4.4.2 Visual Assessment - the site supervisor will make a visual inspection of dust emissions at the site perimeter at least twice daily to ensure that no dust blows off site. The operating staff will continuously monitor dust emissions whilst the plant is in operation and will control dust emissions listed below. Results of monitoring exercises will be entered in the log book/site diary.
- 4.4.3 A water hose and water supply will be made available in addition to the fixed water suppression on the crusher and screen (if fitted) to allow the operator to spray areas on and around the machinery which are likely to give rise to dust emissions. The following areas of the plant are considered to be the most likely to produce dust:
- i. Feed area/hopper/crushing chamber;
 - ii. Discharge point onto conveyors (the discharge points will be enclosed as far as is practicable);
 - iii. The drop conveyor.
- 4.4.4 Sheeting of vehicles - All loads will be sheeted or sprayed with water prior to leaving the site to ensure that they comply with the requirements of the Duty of Care.
- 4.4.5 Stockpile management
- i. During dry/windy conditions, stockpiles of waste will be sprayed with water to prevent excessive drying and dust formation and stockpile height will be limited to 10 metres.
 - ii. Drop heights will be kept to a minimum to prevent dust emissions.

4.4.6 Stockpiles will be located to ensure that vehicles leaving the site do not track through the material stockpiles to prevent the deposit of debris on to the highway. The deposit of material on the public highway will be treated as an emergency and will be cleared immediately by the operator using a vacuum tanker or other suitable plant. The proposed site layout is shown on Drawing No. 2632/321/03.

4.4.7 If there is a risk that dust will be emitted following a malfunction or breakdown the plant will be shut down for repairs and the stockpile handled in accordance with the procedures outlined in Section 4.4.

4.5 Odour control

4.5.1 The containment of waste within the site and the inert nature of the construction/excavation waste accepted at the site present a very low risk of odour nuisance. If malodorous waste is deposited on site it will be consigned to the skip for rejected waste or removed from the site immediately.

4.6 Litter control

4.6.1 Although unlikely to present a problem due to the nature of the construction/excavation waste accepted at the site, daily inspections of the site boundary will be carried out for the presence of windblown litter and operatives will be instructed to collect the litter and place it in a skip for disposal/recovery before the end of the working day. In any event all light waste will be placed in skips before the end of the working day.

4.7 Control of pests, birds and other scavengers

4.7.1 It is unlikely that vermin will present a problem because of the waste types handled at the site but a recognised pest control contractor will be brought within 48 hours if any problems are encountered. The site will be inspected daily for the presence of vermin and the results of the inspection noted in the site diary or site inspection form.

4.8 Control and monitoring of noise & vibration

4.8.1 It is not anticipated that site operations will cause a noise or vibration nuisance to the nearby industrial premises, however the Best Practicable Means will be employed on site at all times to ensure that all plant and equipment does not exceed agreed background levels by more than 5dB, measured at the nearest noise sensitive property.

4.9 Complaint procedure

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

5.0 EMERGENCY PROCEDURES

5.1 General

- 5.1.1 In addition to obligations imposed by RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013) the permit holder will notify Natural Resources Wales of any serious injuries to employees of Gary Catton Haulage Limited, other site users or members of the public arising as a result of operations on site. Minor injuries such as cuts and grazes etc. will be recorded in the accident book on site. Separate procedures will be used for different types of emergency. An emergency at the site is defined by the site management as follows:

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

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

5.2 Fire

- 5.2.1 No waste will be burnt on site other than in plant specifically designed for the purpose and in accordance with the relevant statutory instruments. In the event of a fire occurring on site the operator/site supervisor will exercise his judgement and extinguish the fire with the water hose or suitable fire extinguisher and/or call the fire service for assistance. Any fires will be reported to Natural Resources Wales on the working day that they occur and will be confirmed in writing (email) within 3 working days. All staff will be evacuated from the site if necessary. Smoking is not permitted on site. Firefighting residues will be disposed of to a permitted waste management facility.

5.3 Spillages

- 5.3.1 Any fuel stores on site are bunded to contain any fuel leaks. Oil and vehicle maintenance chemicals are securely stored on site. If any spills occur a spill containment kit (absorbent pads, booms or granules) will be used to prevent further spillage and the contaminated absorbents placed in a skip for disposal to a suitably permitted landfill. No chemical leaks are expected in the waste handling area but should they occur the procedures outlined in Section 5.4 will apply.

5.4 Drums

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

5.5 Adverse reactions

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

5.6 High winds

- 5.6.1 There will be no sorting, processing or treatment of any wastes which are likely to be blown around during conditions of high winds. Vehicles leaving the site will be sheeted to comply with the requirements of the Duty of Care legislation.

5.7 Poor visibility

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

5.8 Operational failure

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

5.9 Bomb scare

- 5.9.1 In the unlikely event of a bomb scare the site will be evacuated and the police contacted. The police will then assume control of the site until the threat has been verified or the device defused and removed. Natural Resources Wales will be kept informed of the events on site.

6.0 TRAINING FOR SITE STAFF

6.1 Training needs assessment

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

6.2 Site rules and infrastructure training

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

6.3 Emergency procedures training

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

6.4 Fire safety / firefighting training

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

6.4.3 Regular fire drills will be undertaken by site management to ensure proper procedures are followed by employees in the unlikely event that a fire incident occurs. These will be unannounced drills and will not form part of the induction or review training as specified in for RF/12

6.5 Recognition of waste types training

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

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

6.6 Storage areas / limits training

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

6.6.2 Employees in these roles must also be trained to recognise storage limits to ensure that they are in accordance with those specified in Section 1.5.

6.7 Vehicle / plant preventative maintenance training

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

6.7.2 Training will be in accordance with Section 3.5 of this Management System and will be based on the preventative maintenance schedule supplied by the plant/equipment manufacturer and the in-house maintenance schedule given on RF/11 and RF/22 in Appendix II.

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

6.8 Duty of care training

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

6.9 Plant operation training

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

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

6.10 Permit / management system training

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

6.11 Training for contractors

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