



## **CAERPHILLY SKIPS BESPOKE PERMIT**

## **UPDATED ENVIRONMENTAL MANAGEMENT SYSTEM**

*Report Number 1960r2v2d0520*

*Commissioned by*  
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# 1 INTRODUCTION

Caerphilly Skip Hire (CWS) Limited recycles waste at a site to the northwest of Llanbradach. The operation involves the collection, sorting and temporary storage of skip waste primarily for off-site recovery. The operation is permitted under a Permit issued by the waste regulator Natural Resources Wales (NRW). The waste permit is Permit number EPR/EP3994LG. One of the conditions of holding such a Permit is that a written Environmental Management System (EMS) must be in place. This is an updated EMS for the operation that includes the proposed Permit Variation.

An EMS is a structured system which, once implemented, helps an organisation to identify the environmental impacts resulting from its business activities. It also helps manage and reduce those impacts, so that the environmental performance of the organisation is improved. An EMS should provide a methodical approach to planning, implementing and reviewing an organisation's environmental management.

Under the Environmental Permitting Regulations, CWS is required to have an appropriate EMS in place while it is holding a Permit. The EMS must set out in detail how all the activities relating to the Permit, and specifically waste management and pollution control, will be managed.

Central to the EMS is a set of Procedures and Standard Forms which will assist with the operational performance and recording of waste processing and environmental protection. Ultimately, these records may be used to support Permit surrender.

The procedures and forms included in this EMS are listed in Table 1-1 and Table 1-2 and provided in Appendix 1 and Appendix 2.

- Throughout the document the relevant Procedures and Forms are signposted for ready reference using this style of bullet point.

**Table 1-1 List of Procedures**

<b>Procedure</b>	<b>Title</b>
P001	Waste Acceptance
P002	Discovery of Suspicious Item in Waste
P003	Undertaking a Fire Drill
P004	Spillage/Leakage Response
P005	Preventing Pollution of Surface Water and Groundwater
P006	Response to Flooding of Site
P007	Preventing Noise and Vibration Causing Nuisance
P008	Preventing Dust Problems
P009	Dealing with Litter
P010	Dealing with Mud on Roads
P011	Dealing with Pests
P012	Dealing with Odour Problems
P013	Investigating Near Misses and Accidents
P014	Reporting Environmental Incidents
P015	Managing Complaints
P016	Management of Gas Cylinders

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**Table 1-2 List of Forms**

<b>Form</b>	<b>Title</b>
SF01	Record of Waste Deliveries (implemented through SkipTrak)
SF02	Recording Non-Compliant Wastes
SF03	Preventative Maintenance Programme
SF04	Training Record
SF05	Training Matrix
SF06	Fire Drills
SF07	Daily Site Inspection Form
SF08	Accident and Incident Record
SF09	Recording Complaints
SF10	Customer Complaint Log
SF11	Non-Conformance Corrective Action Report
SF12	Preventative Action
SF13	Audit Programme
SF14	Audit Report

## **1.1 Variation Application**

CWS is currently seeking a Permit Variation. The proposed variation has 5 key elements:

1. Altered site boundary to accommodate the area currently covered by an S2 exemption
2. Increased tonnage throughput
3. Crushing and screening of inert waste inside a building
4. Asbestos acceptance and bulking in a secure container
5. Occasional wood shredding
6. Acceptance of new wastes

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## **2 COMPANY ENVIRONMENTAL POLICY**

### **2.1 Business Ethic**

"Caerphilly skip hire is a family run company that has been based and operated in Caerphilly and surrounding areas and employing local people for the past 50 years. The company has evolved from a sole trader operation to employing 27 local people, operating 20 vehicles a skip manufacturing and repair facility and a fully licenced waste recycling facility.

From those humble beginnings the company has grown and stands as a testament to our ability to endure all the changes thus far unaided. We are now proud to have and continue to provide Skip Hire and Waste Management, Transport, Drivers, Plant, Ground Works, Skip repairs, Vehicle repairs and Emergency works to Local authorities including CCBC, CCC and Schools, local and national Companies, the Royal Mint and most of all the general public of South Wales. We always give the best service that we can at a price that is fair and we believe this is the recipe to our success and longevity. We are also re-investing into our future with new lorries and plant which are more reliable and environmentally friendly."

### **2.2 Environmental Commitment**

CWS is committed to prevention of pollution and continual improvement.

The company is committed to:

- Maintaining an Environmental Management System.
- Recognising and meeting relevant legislation, regulations and other requirements.
- Operating in a way that prevents pollution.
- Providing appropriate environmental training to its employees.

The responsibility for implementation of the Environmental Management system ultimately lies with the Managing Director.

This Policy will be reviewed no later than 12 months from this date.

Other company policies are provided in Appendix 3.

### **2.3 Operating Hours**

Waste transfer station sorting/recycling area (Top Yard Figure 3 Site Plan)  
0630 – 1830 Monday-Saturday  
0900-1400 Sunday

Vehicle movements may be outside the above hours as the business needs dictate this may include the loading of skips onto vehicles for transportation and vehicle leaving and returning to the premises.

In emergency or unforeseen situations some activities in all areas may take place but will be kept to the minimum possible.



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## **3 SITE SETTING**

### **3.1 Site Location**

As shown on Figures 1 and 2, the current operation is located directly north of Llanbradach, which is itself north of Caerphilly, South Wales. The thin linear site measures approximately 400m by 25m and is orientated approximately north-south. The site is located near the base of the valley floor with the valley side steeply rising immediately west. Directly to the north are industrial units, some of which are used for waste activities and some for vehicle maintenance. Directly to the east is a railway line. Beyond the railway line is a Medical Centre, Community Centred, disused works and residential properties. Towards the south, the site is naturally squeezed between the railway line to the east and access road running alongside the western site boundary at an elevated position. Further south is woodland and residential properties.

Many of these features are identified on Figure 2.

### **3.2 Access**

The site is accessed at its northernmost point off Colliery Road which runs above the site to the west, as shown in Figure 3. Photographs of the access route are shown on Figure 4. The exit is at the southernmost point of the site. This arrangement ensures that traffic moves from the north to the south through the site. During an emergency, the site could, however, be accessed from the north or south with both access routes being clear and 3.7m wide.

### **3.3 Environmental Setting**

The site is located in an area where there are no protected ecological sites within 500m. Beyond this distance there is a SSSI 813m south. This was designated for geological reasons. There are no other protected sites within 2km apart from Ancient Woodland, with the nearest being directly west and south of the site.

Groundwater below the site is not part of a Source Protection Zone. The groundwater is however designated as a secondary A aquifer in the superficial deposits and underlying bedrock. These are very likely to be overlain by made ground associated with historical land uses.

There are no surface water bodies close to the site apart from springs to the west issuing from higher ground and these are culverted beneath the site.

The site is close to residential properties, as shown on Figures 1 - 3. The closest are located to the west and separated from the site by dense woodland.

Wind direction is typically from the south to the north of the yard, as experienced by the site operator and in general accordance with the prevailing south-westerly wind directions experienced in the South Wales valleys.

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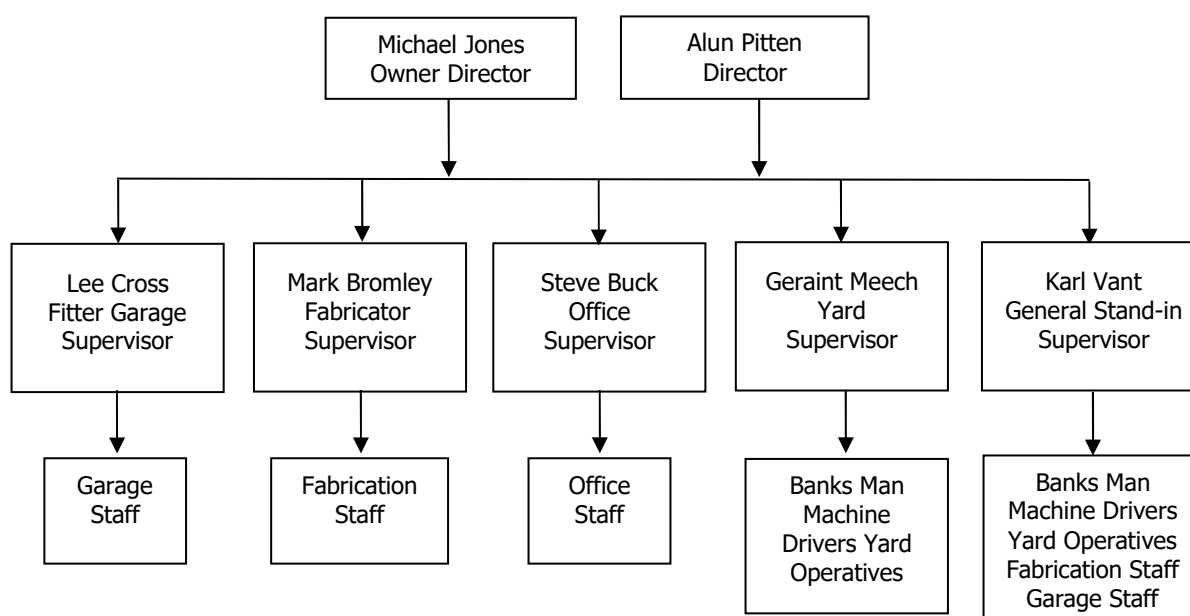
## 4 MANAGEMENT, COMPETENCE AND TRAINING

CWS recognises that an EMS should not be viewed in isolation as many aspects of the business can impact on the successful implementation of the EMS. CWS also recognises that the role of the management representative is not to undertake all of the work required to implement the EMS. For this reason, CWS will document the roles and responsibilities for all personnel. Key authorities and responsibilities will be defined, documented and communicated to all employees.

The current company structure is shown below.

Financial Director Mr Alan Pitton will be the management representative appointed to oversee implementation of the EMS.

**Flowchart 4-1 Current Company Structure**



All employees will be made aware of their responsibility in achieving conformance with the environmental policy and the requirements of the EMS. Table 4-1 summarises the basic requirements for different levels of employees.

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**Table 4-1 Minimum expectations for Personnel**

<b>Title</b>	<b>Responsibility</b>
Top Management	Define and approve issue of the environmental policy. Nominate an environmental management representative. Review the EMS at set intervals. Provide sufficient resources essential to the implementation and control of the EMS.
Supervisors	Ensure establishment of EMS and reporting on performance to the top management.
Site personnel	Responsibilities are dependent upon their role.

## **4.1 Operator Competence**

CWS recognises that to operate under a Permit, trained and competent staff are required. On this basis, the Managing Director (Mr Michael Jones) been assigned as the Technically Competent Person (TCP). The TCP will coordinate compliance with the Permit.

The TCP is not the sole individual responsible for ensuring compliance with the Permit or implementing the EMS as this requires input from the company and all relevant personnel involved with the permitted activities.

## **4.2 Relevant Training**

All relevant staff working on the permitted activities will be trained on the requirement of the Permit and the EMS. To assist with management of training records and needs, CWS will regularly undertake analysis to identify skill gaps and record all training on the relevant forms in Appendix 2.

- See Training Forms SF04 and SF05 in Appendix 2

CWS will ensure that all relevant staff are:

- trained in aspects that can lead to pollution and the measures to be taken to prevent that pollution.
- trained to deal with accidents.
- aware of responsibilities under the Permit.
- aware of the importance of equipment and plant maintenance.
- competent to operate machinery and provided with safe operating instructions for that equipment or activity.
- appropriately inducted, including contractors.

Records of training will be maintained by CWS.

- See Training Forms SF04 and SF05 in Appendix 2

The management of CWS is fully committed to protecting the environment and demonstrating continual environmental improvement. Through effective training, communication and delegation, CWS will encourage all employees to be committed to the full implementation of this EMS.

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## **5 INFRASTRUCTURE AND EQUIPMENT**

### **5.1 Notice Board**

CWS will display a clear Site Notice Board at the entrance to the site.

The board shall contain the following information:

- Company Name
- Permit Holder's Name
- Emergency Contact Name
- Permit Holder's Telephone Number
- Statement that the site is permitted by Natural Resources Wales
- The Permit Number
- NRW National Numbers
- Any other NRW Telephone Number required

If damaged, the board shall be repaired or replaced within five working days.

### **5.2 Security**

Entrance to the site is normally at the northern end of the site, off Colliery road. This entrance is through steel gates and barrier which are locked when the site is not operational. The site can also be accessed on road from the south, but this exit is also locked when the site is not operational. The western boundary of the site rises steeply up to Colliery Road and there are no formal access routes. The eastern boundary runs alongside the railway line. The site cannot therefore be easily accessed out of hours.

The northern perimeter of the site is partly fenced and partly directly against adjacent buildings. The westerly side is fenced and has a near vertical embankment. As the site narrows to the south there is another steel face. The whole of the eastern embankment lies directly adjacent to a railway line.

The sorting and arrival area benefits from a CCTV system that can be accessed via telemetry on mobile devices.

The security of the site and perimeter fences is subject to weekly inspections.

### **5.3 Site Layout**

The long narrow site is naturally split into two areas referred to as top yard (at a higher elevation) and lower yard (at a lower elevation). All waste acceptance and sorting is undertaken in the top yard. The lower yard is used for storage of empty skips and secure containers. Both areas are shown in the following photographs and identified on Figures 3 and 4.



**Plate 5-1 View South over concrete in part of Top Yard**



**Plate 5-2 Skip storage area in lower yard**

Following acceptance at the site, the waste is tipped from skips onto the outdoor impermeable surface in the top yard. The top yard benefits from impermeable surfacing and sealed drainage that passes through an interceptor. In this area, all waste is rapidly inspected and sorted using manual and mechanical means including an excavator with a selector grab, a riddle bucket and a front loading shovel. Some of the waste is passed through a trommel for further separation. Asbestos waste is placed directly into secure storage.

The trommel and crusher are located within a building. Fixed position atomiser sprays and

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sprinklers are to be installed in the building. Any screening of materials such as soil and stone or shredding of wood is undertaken on the top yard. Both activities are not permanent and will only occur for short duration.

All separated waste materials are immediately placed into dedicated reversed parked RORO skips for temporary secure storage prior to off-site recovery and disposal.

The lower yard is used for short-term (typically < 2 days) storage of waste in secure containers and the storage of empty skips.

All skip vehicles using the facility will be pre-booked and will mainly be vehicles operated by CWS. The Yard manager will visually inspect each load prior, during and following tipping or placement into storage in accordance with Procedure P001.

➤ See Procedure P001

The yard manager will be conversant with the requirements of the Permit and will be responsible for ensuring materials are tipped in a proper and safe manner. Particular attention will be given to identifying non-permitted waste.

The site layout is shown in Figure 5.

Initial sorting of incoming skip waste is in AREAS A and B of Figure 5. All materials separated for off-site recovery or disposal are temporarily stored in Areas C, D, G and H.

CWS will be aware of planned asbestos waste deliveries. Such waste will be inspected and directly placed into a secure sealed container in AREA J.

## **5.4 Fuel Storage**

There is no fuel storage within the permitted boundary.

## **5.5 Oil Storage**

There is no oil storage within the permitted boundary.

## **5.6 Gas Cylinders**

Non-permitted orphaned cylinders will be temporarily placed into safe storage cages located in the area shown on Figure 5. This location is away from the main working area and site traffic. These are managed in accordance with Procedure P016.

➤ See Procedure P016 in Appendix 1 for managing cylinders

## **5.7 Plant and Equipment**

The waste operation uses the following plant and equipment:

- 1 no. Loading shovel
- 2 no. 14 tonne excavators with material grabs

- 
- 1 no. 14 tonnes excavator with bucket for loading screen
  - 1 no. 8 tonnes excavator loading trommel

All plant is subject to a preventative maintenance programme.

## **5.8 Pollution Control Measures**

All waste processing occurs on the top yard. In the most part, this area of the site comprises of reinforced concrete that directs surface drainage to a Class 1 full retention interceptor fitted with a silt trap and oil alarm. This concrete is soon to be extended into areas currently comprising hardstanding, as shown in Figure 3.

The concrete has been constructed with falls that direct run-off to the southern edge of the top yard where the interceptor is located. Run-off is prevented from running down to the lower bottom yard by a concrete push wall and sleeping policeman.

Site drainage is shown on Figure 6. The surface elevation of the concrete in the top yard falls from approximately 106.31 mAOD in the north to 105.29mAOD in the south. This is a fall of 1m over 25m. Falls in the concrete direct all run-off to the interceptor. After passing through the interceptor, drainage passes to land drains on the eastern site boundary.

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## 6 WASTE MANAGEMENT OPERATION

### 6.1 Permitted Operations

The currently permitted activities and those proposed through the Variation are detailed in Table 6-1.

**Table 6-1 Proposed changes to Site Activities**

Table 6-2 Proposed changes to Site Activities	
Description of Activities	Limitation of Activities
<b>CURRENT OPERATION</b>	
R13 Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced)	Storage of non-hazardous waste shall be carried out on an impermeable surface with sealed drainage. There shall be no treatment of waste other than sorting for the purpose of recovery only.
D15 Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where the waste is produced)	
<b>PROPOSED OPERATION FOLLOWING VARIATION</b>	
R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)	The maximum quantity of asbestos waste received at the site shall not exceed 10 tonnes per day.  The maximum quantity of asbestos waste stored at the site shall not exceed 10 tonnes.  Treatment consisting only of manual sorting, separation, screening, shredding, crushing or compaction of non-hazardous or inert waste into different components for disposal or recovery.  There shall be no treatment of asbestos waste.  Specified waste shall be stored and treated on either (1) hard standing or (2) an impermeable surface with run-off from the impermeable surface passing through suitable well maintained interceptors. Specified wastes are identified in Table 6-2.
D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)	
D14: Repackaging prior to submission to any of the operations numbered D1 to 13	
D9: Physico-chemical treatment not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12	
R3: Recycling/reclamation of organic substances which are not used as solvents	
R4: Recycling/reclamation of metals and metal compounds	
R5: Recycling/reclamation of other inorganic materials	

### 6.2 Permitted waste types

Waste types and quantities are restricted to those listed in the site Permit. The site currently accepts:

- non-hazardous wastes
- inert Waste
- General & bio-degradable waste consisting of mixed construction, demolition and excavation waste (CDEW) and wood (treated and untreated)

The Variation will enable CWS to accept several other new wastes include green waste, plasterboard and asbestos. The list of current and wastes is provided in Table 6-2.



**Table 6-2 List of Acceptable Wastes**

New Waste	Specified Waste	Code	Description of Waste to be Accepted	Waste Ref. & Processing Limitations
		<b>01</b>	<b>WASTES RESULTING FROM EXPLORATION, MINING, ING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS</b>	
		<b>01 04</b>	<b>wastes from physical and chemical processing of non-metalliferous minerals</b>	
Y	Y	01 04 08	waste gravel and crushed rocks other than those mentioned in 01 04 07	WRAP AGG
Y	Y	01 04 09	waste sand and clays	WRAP AGG (sand only)
		<b>02</b>	<b>WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING</b>	
		<b>02 01</b>	<b>wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing</b>	
Y		02 01 03	plant-tissue waste	
		02 01 04	Waste plastics (except packaging)	
Y		02 01 07	wastes from forestry	
		02 01 10	waste metal	
		<b>03</b>	<b>WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE, PULP, PAPER AND CARDBOARD</b>	
		03 01	wastes from wood processing and the production of panels and furniture	
Y		03 01 01	waste bark and cork	
		03 03	wastes from pulp, paper and cardboard production and processing	
Y		03 03 01	waste bark and wood	
		<b>07</b>	<b>WASTES FROM ORGANIC CHEMICAL PROCESSES</b>	
		07 02	Wastes from MFSU plastics, synthetic rubber and man-made fibres	
		07 02 13	Waste plastic	
		<b>10</b>	<b>WASTES FROM THERMAL PROCESSES</b>	
		<b>10 11</b>	<b>wastes from manufacture of glass and glass products</b>	
Y		10 11 03	waste glass-based fibrous materials	WRAP AGG (without organic binders)
		<b>10 13</b>	<b>wastes from manufacture of cement, lime and plaster and articles and products made from them</b>	
Y		10 13 10	wastes from asbestos-cement manufacture other than those mentioned in 10 13 09	ASB
		<b>12</b>	<b>WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF METALS AND</b>	
		12 01	wastes from shaping and physical and mechanical surface treatment of metals and plastics	
		12 01 01	ferrous metal filings and turnings	
		12 01 02	ferrous metal dust and particles	
		12 01 03	Non-ferrous metal filings and turnings	
		12 01 04	Non-ferrous metal dust and particles	
		12 01 05	Plastics shavings and turnings	

New	Specified Waste	Code	Description of Waste to be Accepted	Waste Ref. & Processing Limitations
		<b>15</b>	<b>WASTE PACKAGING, ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED</b>	
		<b>15 01</b>	<b>packaging (including separately collected municipal packaging waste)</b>	
		15 01 01	paper and cardboard packaging	
		15 01 02	plastic packaging	
		15 01 03	wooden packaging	Wood
		15 01 04	metallic packaging	
		15 01 05	composite packaging	
		15 01 06	mixed packaging	
	Y	15 01 07	glass packaging	WRAP AGG
		<b>16</b>	<b>WASTES NOT OTHERWISE SPECIFIED ON THE LIST</b>	
		<b>16 01</b>	<b>End-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)</b>	
		16 01 17	Ferrous metal	
		16 01 18	Non-ferrous metal	
		16 01 19	Plastic	
		<b>16 02</b>	<b>Wastes from electrical and electronic equipment</b>	
Y		16 02 14	Discarded equipment other than those mentioned in 16 02 09 to 16 02 13	
		<b>17</b>	<b>CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)</b>	
		<b>17 01</b>	<b>concrete, bricks, tiles and ceramics</b>	
	Y	17 01 01	Concrete	WRAP AGG
	Y	17 01 02	Bricks	WRAP AGG
	Y	17 01 03	tiles and ceramics	WRAP AGG
	Y	17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06	WRAP AGG
		<b>17 02</b>	<b>wood, glass and plastic</b>	
		17 02 01	Wood	Wood
	Y	17 02 02	Glass	WRAP AGG (not including fibreglass or glass fibre)
		17 02 03	Plastic	Plastic
		<b>17 03</b>	<b>bituminous mixtures, coal tar and tarred products</b>	
	Y	17 03 02	bituminous mixtures other than those mentioned in 17 03 01	WRAP AGG (Allowed only if: Bituminous mixtures from the repair and refurbishment of the asphalt layers of roads and other paved areas (excluding bituminous mixtures containing coal tar and classified as waste code 17 03 01). Must not include coal tar or tarred products. Must not include freshly mixed bituminous mixtures.

New	Specified waste	Code	Description of Waste to be Accepted	Waste Ref. & Processing Limitations
		<b>17 04</b>	<b>metals (including their alloys)</b>	
		17 04 01	copper, bronze, brass	
		17 04 02	Aluminium	
		17 04 03	Lead	
		17 04 04	Zinc	
		17 04 05	Iron and steel	
		17 04 06	Tin	
		17 04 07	mixed metals	
		17 04 11	cables other than those mentioned in 17 04 10	
		<b>17 05</b>	<b>soil (including excavated soil from contaminated sites), stones and dredging spoil</b>	
	Y	17 05 04	soil and stones other than those mentioned in 17 05 03	WRAP AGG (Must not contain any contaminated soil or stone from contaminated sites).
		17 05 06	dredging spoil other than those mentioned in 17 05 05	WRAP AGG (Allowed only if: Inert aggregate from dredgings. Must not contain contaminated dredgings. Must not contain fines).
	Y	17 05 08	track ballast other than those mentioned in 17 05 07	WRAP AGG (Allowed only if: Does not contain soil and stones from contaminated sites).
		<b>17 06</b>	<b>insulation materials and asbestos-containing construction materials</b>	
Y		17 06 01*	insulation materials containing asbestos	ASB
Y		17 06 03*	other insulation materials consisting of or containing dangerous substances	ASB
Y		17 06 04	insulation materials other than those mentioned in 17 06 01 and 17 06 03	ASB
Y		17 06 05*	construction materials containing asbestos	ASB
		<b>17 08</b>	<b>gypsum-based construction material</b>	
Y		17 08 02	gypsum-based construction materials other than those mentioned in 17 08 01	
		<b>17 09</b>	<b>Other construction and demolition wastes</b>	
		17 09 04	Mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03	WRAP AGG (Allowed only if: The waste is generated from utilities trenching's. The waste consists of subbase aggregates i.e. granular material. The waste contains only materials that would be described by entries 17 01 01, 17 03 02 and 17 05 04 in the WRAP protocol if the waste was not mixed).

New	Specified waste	Code	Description of Waste to be Accepted	Waste Ref. & Processing Limitations
		<b>19</b>	<b>WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE</b>	
		<b>19 10</b>	<b>Wastes from shredding of metal-containing wastes</b>	
		19 10 01	Iron and steel waste	
		19 10 02	Non-ferrous waste	
		<b>19 12</b>	<b>wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified</b>	
		19 12 01	Paper and cardboard	
		19 12 02	ferrous metal	
		19 12 03	non-ferrous metal	
		19 12 04	Plastic and rubber	
	Y	19 12 05	Glass	WRAP AGG (Without glass from cathode ray tubes.
		19 12 07	wood other than that mentioned in 19 12 06	Wood
Y	Y	19 12 09	minerals (for example sand, stones)	WRAP AGG (Must not contain contaminated concrete, bricks, tiles, sand, stone or gypsum from recovered plasterboard.
		<b>20</b>	<b>MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS</b>	
		<b>20 01</b>	<b>separately collected fractions (except 15 01)</b>	
		20 01 01	Paper and cardboard	
		20 01 02	Glass	WRAP AGG (Must not include fibreglass)
Y		20 01 36	Discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35	
		20 01 38	wood other than that mentioned in 20 01 37	Wood
		20 01 39	Plastics	
		20 01 40	Metals	
		<b>20 02</b>	<b>garden and park wastes (including cemetery waste)</b>	
Y		20 02 01	biodegradable waste (wood and bark only)	
	Y	20 02 02	soil and stones, mixed inert waste	WRAP AGG
		<b>20 03</b>	<b>Other municipal wastes</b>	
Y		20 03 01	Mixed general waste	
Y		20 03 07	Bulky waste	
Y		20 03 99	Municipal wastes not otherwise specified	

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### **6.3 Waste Acceptance**

The company's success relies upon the rapid sorting of waste brought to site in skips. In the most part, the waste is brought to site by the CWS skip wagon fleet which includes 6 wagons and a stock of approximately 400 skips. The skips accepted vary in size from 2 to 35 cu yd with all skips being rapidly sorted and separated materials quickly taken to other waste management facilities for recovery or disposal.

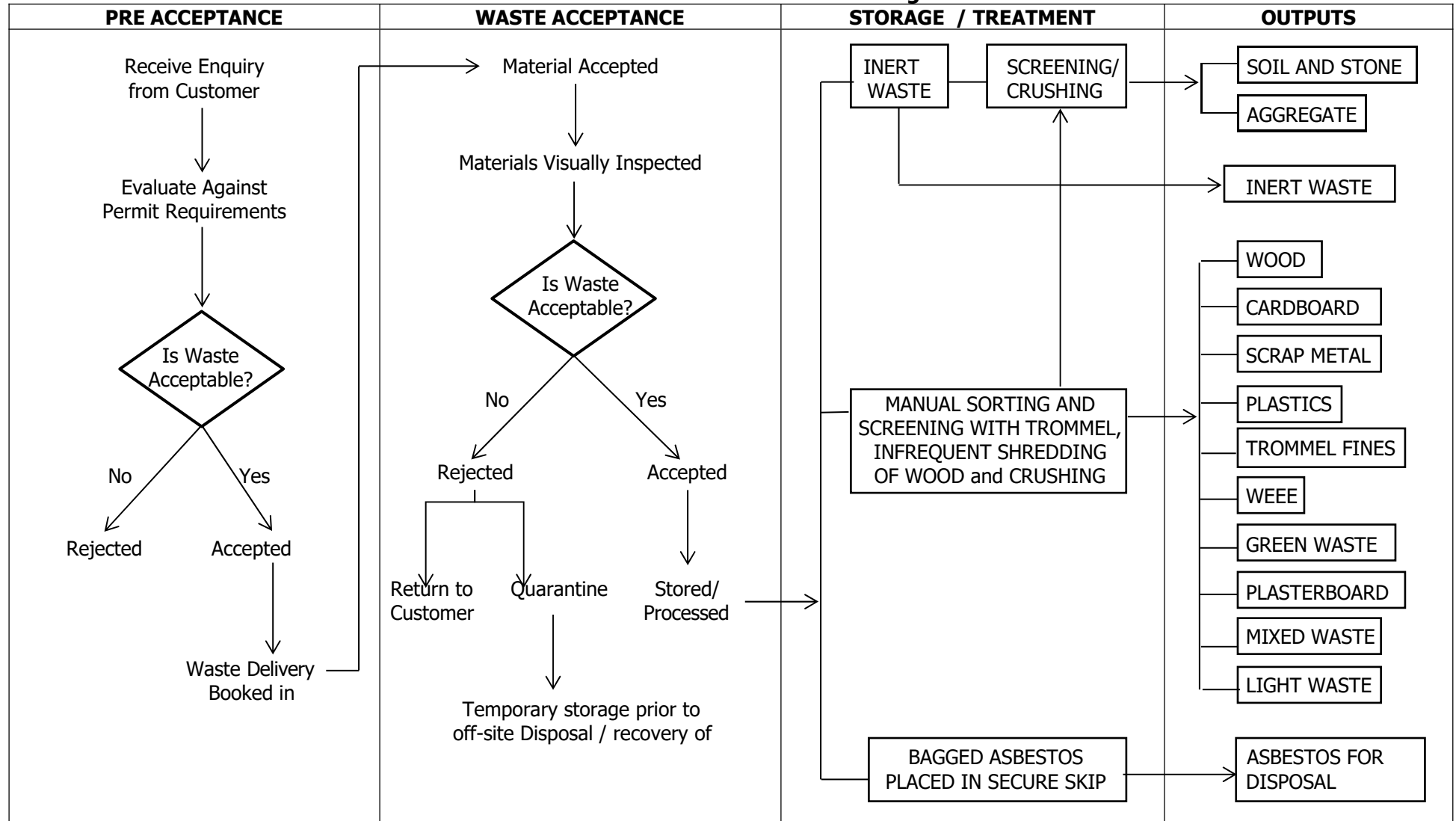
CWS recognises that waste acceptance is key to commercial success and environmental performance. A dedicated procedure is in place that details the overall waste acceptance procedure from initial enquiry through to waste placement into dedicated storage areas. The overall process is summarised in Flowcharts 6-1 and 6-2.

- See Procedure P001 in Appendix 1
- See Forms SF01 and SF02 in Appendix 2

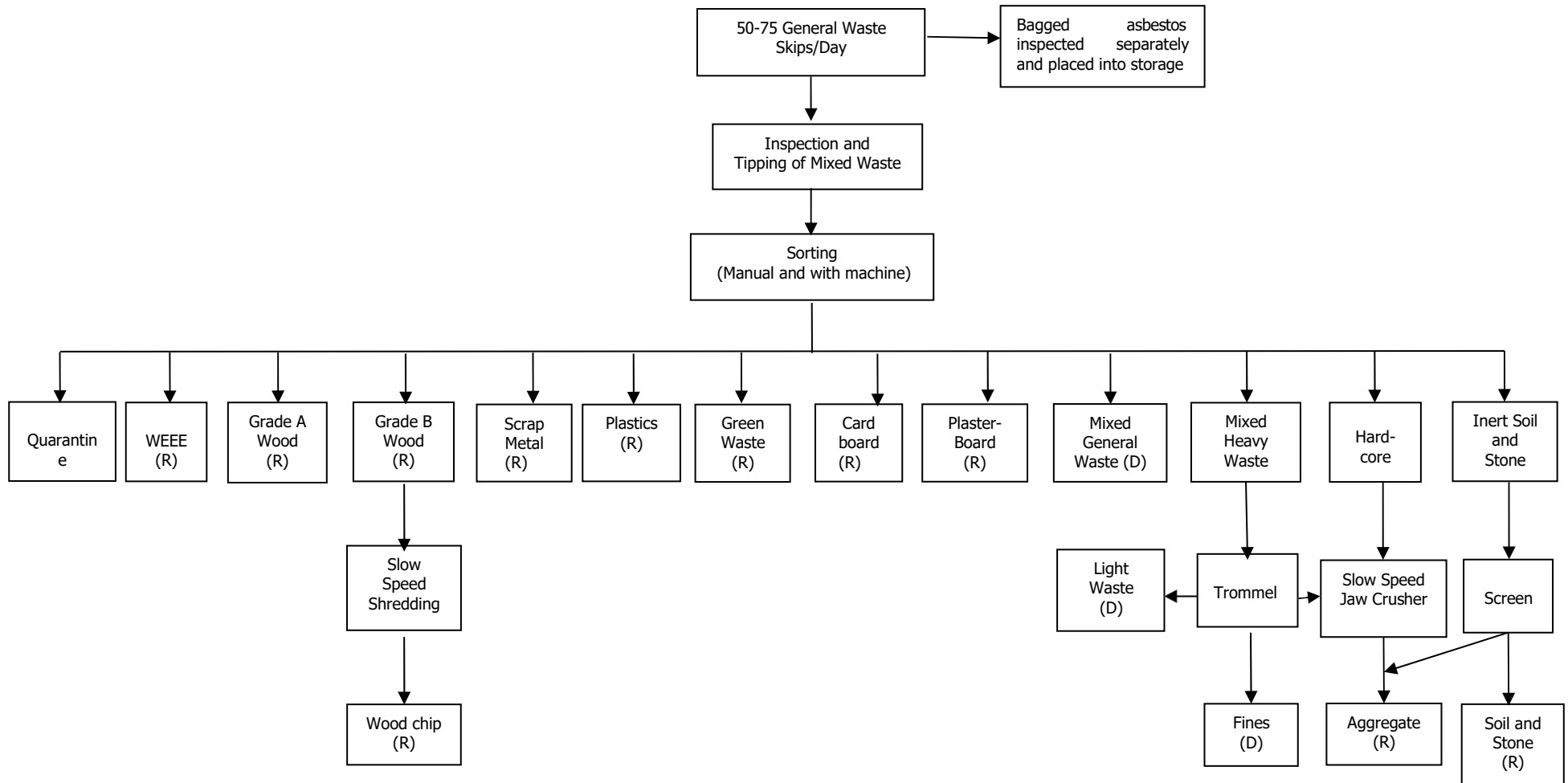
Procedures are also in place for dealing with suspicious and non-permitted items

- See Procedure P002

**Flowchart 6-1 Overview of Waste Management**



**Flowchart 6-2 Processing of Skip Waste**



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## **6.4 Skip Waste Processing**

The top yard is used for waste treatment and temporary waste storage as described below. The bottom yard is only used for temporary storage of secure containers prior to off-site transport.

### **6.4.1 Manual sorting**

Sorting is carried out in Area A by trained operatives. Protective equipment will be provided for and used by operatives at all times.

Initial inspection and sorting primarily removes separation of recyclable and non-recyclable materials. These are handled manually or by machine and stored in AREAs B or C on the site plan (see schematic in Figure 5).

Separate fractions of material for recycling will be placed directly into reverse parked RORO skips in Areas D and G.

### **6.4.2 Mechanical screening**

Mechanical screening is undertaken to facilitate the effective transport of material for final recovery elsewhere using a trommel and manual picking line inside the building in AREA I.

### **6.4.3 Screening**

Mixed rubble and soils generated by the sorting process or delivered in skips may need to be passed through a screen. The screen is positioned in AREA H on Figure 5. The screen produces a product to a fixed given size. During the process, an over band magnet would be used to remove ferrous metals and an eddy current separator to selectively remove non-ferrous components.

The screen has an approximate capacity of 80 tonnes/hr. An excavator loads the screen via a hopper with screened materials discharging to the side and oversize at the end. This is infrequently used with the operation subject to noise and dust management control. Within AREA H, materials produced from the screening process are discharged in a separate ensuring no cross-contamination with feedstocks.

### **6.4.4 Crushing**

Inert construction and demolition waste, such as soil and stone, concrete, bricks, tiles and ceramics and mixtures thereof are crushed in the existing building directly adjacent to the trommel (AREA I). This enables materials to be directed by conveyor from the trommel and picking line directly to the crusher. This crushing operation is undertaken using a mobile slow speed electric jaw crusher fitted with spray bars enabling oversize material to be size reduced and sorted whilst dust and noise release is minimised within the building.

Dust suppression includes fixed position and mobile high pressure, low volume water sprays (atomiser sprays) and sprinklers. In combination, the integrated spray bars and atomisers enable potential emission points to be controlled, particularly around the crusher unit.

Crushing is undertaken irregularly for short periods.



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#### **6.4.5 Shredding**

Shredding of waste wood is sometimes undertaken externally using a slow speed shredder. During the shredding, mobile atomiser units would be placed around the plant to prevent the release of airborne particulates. The unit would also be fitted with integrated noise dampening. This activity would be undertaken infrequently, for short periods in AREA K. The shredded wood is placed directly into a RORO skip for off-site recovery.

#### **6.5 Asbestos Bulking**

Small quantities of double bagged asbestos are accepted for temporary secure storage and bulking prior to off-site disposal. There shall be no treatment of asbestos. This activity is limited to the top yard with the secure container located in AREA J. Most asbestos will be bound chrysotile asbestos. All asbestos waste will be handled by trained personnel and stored in sealed skips before transport off-site for disposal.

#### **6.6 Quarantine**

Non-permitted wastes identified during waste acceptance are managed to reduce their risk to health and the environment. A dedicated external cage is provided for orphan cylinders and a covered secure store for batteries.

#### **6.7 Secure Container Storage**

On the bottom yard, empty skips and secure skips containing non-hazardous waste are stored on concrete for short periods (<2 days) prior to transport off-site. The waste is sheeted if water ingress needs to be prevented or there is a risk of litter / pests. The bottom yard is indicated on Figure 5.

#### **6.8 Production of Aggregates from Inert Waste**

To enhance the recovery opportunities of inert waste, CWS also wishes to produce aggregates i.e. granular materials, in accordance with the WRAP Quality Protocol for the Production of Aggregates from Inert Waste. The aggregates will primarily be used in local construction projects. For the avoidance of doubt, clays and soils are not considered to be aggregates and so will not be subject to the Quality Protocol. The production will be subject to Factory Production Control. The wastes that would be considered for aggregate production are identified in the last column of Table 6-2 as WRAP Agg.

The production of aggregates will involve size reduction and sorting, where necessary, of the acceptable wastes to produce aggregates that meet the Standards and Specifications set out in the Quality Protocol. Some materials will not require processing to meet the Standards and Specifications or the requirements of customers holding relevant Permits, Exemptions or Cl:aire cluster Definition of Waste Code of Practice (DoWCoP) declarations.

The precise range of aggregates will be dependent upon demand and will be controlled by altering the way in which the waste is screened and crushed. To demonstrate that aggregate has been produced, a rigorous testing regime will be in place in accordance with the requirements of the protocol.

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Following the processing, a series of size graded stockpiles of aggregate will be available to be tested and used. Depending upon the grade of stockpile, customer requirements and prevailing weather, the aggregate product will be stored outdoors in accordance with the Factory Production Control requirements.

The Factory Production Control is outlined in Appendix 4.

## **6.9 Screening of Soil**

Inert soil and stone waste entering the site as skip waste is likely to be coded 17 05 04 or 20 02 02. Depending upon the extent of processing at the Llanbradach site, the waste may retain its original code or leave the site with a different code. For instance, if soil and stone has not been processed and entered the site coded as 17 05 04 then it could leave the site as 17 05 04 and be used at an exempt or permitted site. If, however, the soil and stone had been mixed with other clearly identifiable separate wastes and required sorting and / or screening then an alternate 19 waste code would be more applicable e.g. 19 12 12. Soil that does not require any processing, or just mechanical sorting, could be considered a by-product (of the original development process) and used at another site after being temporarily stored at the CWS site. This could be achieved using the Claire code of practice.

## **6.10 Processing of Wood**

To reduce traffic movements and widen off-site recovery options, CWS will sometimes shred waste wood accepted at the site. Using a slow speed shredder, the waste wood would be shredded and then placed directly into RORO skips for off-site recovery. As with the crusher and screen, this operation would be reliant upon market demand and would only be undertaken for short periods intermittently. This activity would be undertaken outdoors with dust and noise controlled.

In addition to processing the wood to simply increase tonnage in loads taken off site for recovery, CWS may also process waste wood in accordance with PAS 111:2012 Specification for the requirements and test methods for processing waste wood. Before such an operation is undertaken a Factory Production Control system would be prepared.

Waste wood can arise in a multitude of forms as shown by the waste codes in Table 6-2. Wood entering the waste stream is typically placed into four grades, (A, B, C and D) according to its general suitability for certain end uses. Each grade reflects the composition, degree of chemical treatment, physical condition, levels of non-wood contamination, and other characteristics of the waste wood, as summarised in Table 6-3.

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**Table 6-3 Description of Wood Grades**

Grade	Typical sources	Typical Markets
A	Distribution, Retailing, Packaging. Secondary manufacture, e.g. joinery. Pallet reclamation.	A feedstock for the manufacture of professional and consumer products such as animal bedding and horticultural mulches. May also be used as fuel for renewable energy generation in non-WID installations, and for the manufacture of pellets and briquettes.
B	As Grade A, plus construction and demolition operations transfer stations.	A feedstock for industrial wood processing operations, such as the manufacture of panel products, including chipboard and medium density fibreboard.
C	All above, plus municipal collections, recycling centres transfer stations and civic amenity recycling sites.	Biomass fuel for use in the generation of electricity and/or heat in WID compliant installations.
D	All of the above plus fencing, track work and transmission pole contractors.	Requires disposal at facilities licensed to accept hazardous waste.
Table adapted from PAS 111		

Each end use of recycled wood will have specific requirements for wood materials which are acceptable. In particular, some treated wood waste will contain chemical compounds which are not acceptable to some end use applications.

Depending upon the nature of the waste wood and the customer's requirements, the wood will typically first be manually sorted to remove unsuitable contraries and then shredded.

As part of its duty of Care, CWS will ensure that all outlets for the wood will be suitably permitted, where required, and if the material is shipped overseas, a full audit of the supply chain undertaken. This will ensure that the material is handled safely and only passed to people who are authorised to receive it.

### 6.11 Waste Handling and Storage

All wastes are handled in a way that minimises environmental emissions such as dust and noise. Each waste is stored in dedicated site areas as shown on Figure 5.

There are also specific management plans for Fire Prevention and Mitigation and Noise Management.

### 6.12 Waste Records

The daily work summary sheets for wastes received and removed from the site are open for inspection and the loads and quantities involved will be reconciled and transposed onto record forms designed for this purpose. All of this information is currently done electronically through a dedicated computer programme called SkipTrak.

A summary will be prepared at the end of each quarter showing waste type quantities and destination if all incoming and outgoing loads. A copy of this will be forwarded to NRW quarterly on the standard return forms provided by NRW.

### 6.13 Site Diary

The site diary is kept on site and is available for inspection. The following events are recorded:

- Construction work
- Maintenance

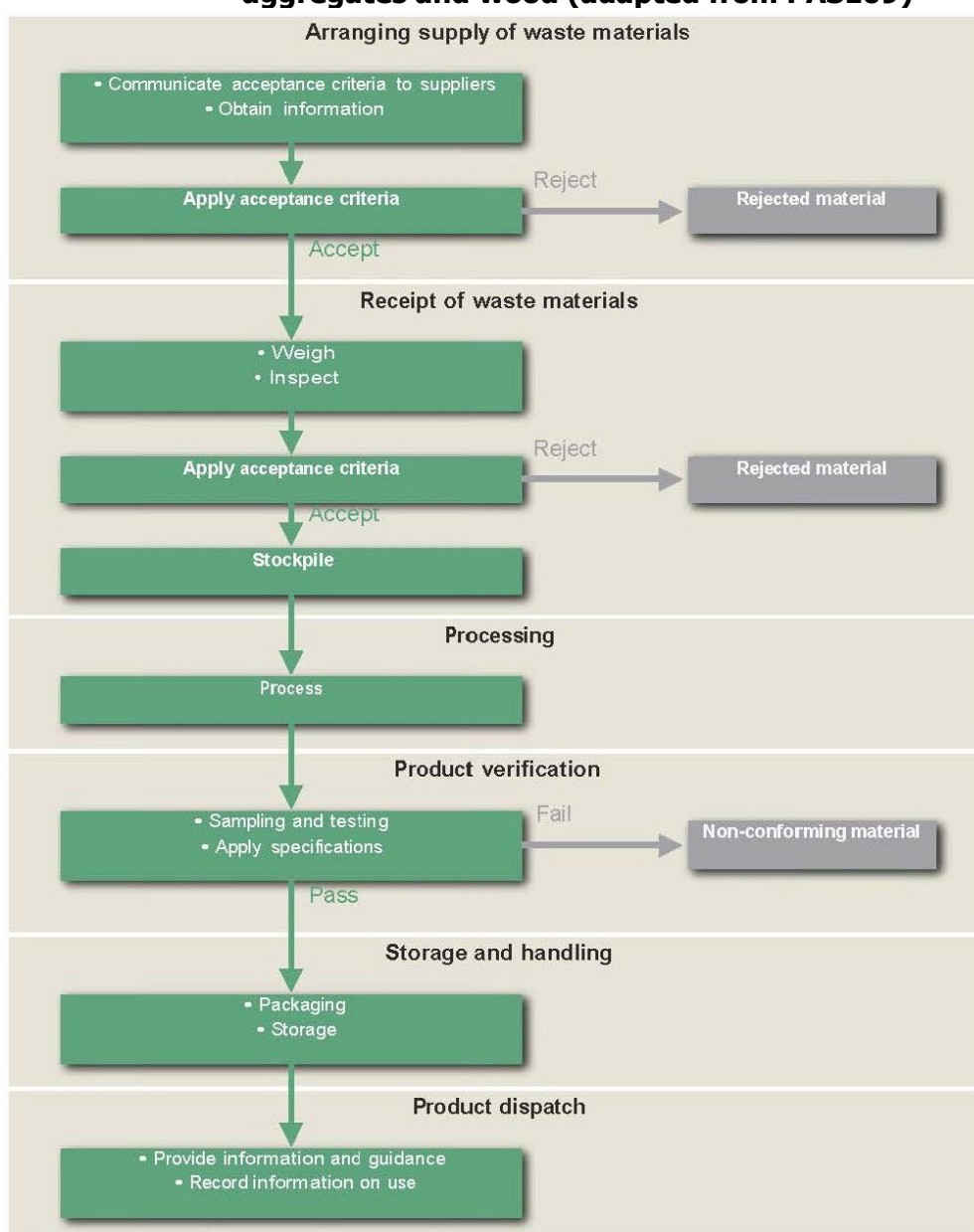
- 
- Breakdowns
  - Emergencies
  - Problems with waste received and action taken
  - Site inspections carried out by the operator
  - Despatch of records to the Agency
  - Severe weather conditions
  - Environmental problems and remedial actions
  - Arrival and leaving times of technically competent manager
  - Complaints about site operations and action taken

## 7 FACTORY PRODUCTION CONTROL

In addition to the procedures to be set out in the EMS for waste acceptance, Factory Production Control (FPC) systems will also be established if sufficient market demand is identified; one for the production of aggregates and one for the processing of waste wood to meet PAS 211. The FPCs will extend beyond the requirements of this EMS to demonstrate that the waste has ceased to be waste and that a product has been manufactured or waste recovered. However, there will be significant overlap with the EMS to ensure risks to the environment are managed and documented.

The overall process of Factory Production Control is summarised in the flow chart below with further detail provided in the following sections and relevant forms in Appendix 4. The FPCs will be fully documented before the processes become operational.

**Flowchart 7-1 Generic Factory Production Control process for production of aggregates and wood (adapted from PAS109)**



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## **7.1 Method Statement of Production**

1. All operational staff are to be fully trained in the waste recycling operations including:
  - a) Location of different waste
  - b) Types of waste
  - c) Location of finished products
  - d) Types of finished Products
  - e) Manufacture of different finished products

The areas of waste and finished products will be clearly marked with signs. All wood will be kept in RORO skips but aggregates may also be retained in stockpiles within the processing AREA H.

2. Operational staff will be informed by the plant foreman or the managing director of the product requirement and the plant equipment to use to produce the products.
3. The recycling process will involve the operation of dedicated equipment. Records of maintenance of these pieces of equipment will be kept in accordance with MAINTENANCE RECORDS.
4. Relevant operational staff will be trained in the operation of the plant and a record of this training kept at the site office in accordance with TRAINING RECORDS.

## **7.2 Product Inspection and Testing**

1. The manufacture of finished product will be recorded by operational staff on the DAILY PROCESS CONTROL RECORD. During the process, the operational staff will visually inspect the material produced to see if it complies with the required specification. Comments about process difficulties should be recorded on this form.
2. Where necessary, each of the products will be routinely sampled and tested to assess the quality of the product. The assessment criteria will be based on customer required and published standards.
3. A schedule of testing shall be forwarded to the laboratory.
4. The testing records received from the laboratory will state whether the material conforms with the requirement of the end product as manufactured or specified by the client. The testing records shall be examined by the Operation manager.
5. Non-conforming products will be identified. The cause will be investigated and recorded on NON CONFORMING PRODUCTS FORM in accordance with the relevant procedures.

## **7.3 Product Handling and Storage**

1. Product will be kept separate and away from waste stockpiles to avoid cross contamination.
2. All wood will be kept in RORO skips but aggregates may also be retained in stockpiles within processing AREA H.
3. The finished products will be clearly marked with signs.
4. The finished products will be handled/moved/loaded using a front end shovel or if necessary, using an excavator.
5. The operational staff will be responsible for the cleanliness of the machinery used in the handling of the finished product in order to avoid cross contamination. If necessary, cleaning will involve washing out the buckets of either shovel or excavator.

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6. If cross contamination occurs, the product stockpile will be cleaned of any contaminated material. The contaminated material removed will be placed into the appropriate waste stockpile to await re-processing.

#### **7.4 Product Non-Conformance**

1. On receiving a complaint or non-conforming laboratory test result, an investigation to determine the root cause will be undertaken. The DAILY PROCESS CONTROL RECORD FORMS will be evaluated to see if any indication is provided. The issue would be discussed with the relevant operating/processing staff to try and establish the cause of the problem.
2. The non-conforming material shall be either:
  - a) Reprocessed
  - b) Used for another end use which it is suitable for
  - c) Rejected and marked (on a sign) as being non-conforming
3. If the material has already been sent to a client, then an agreement will be made as to the course of action taken.
4. If the causes of the non-conformance can be established then a series of corrective actions will be implemented and documented. These could include:
  - a) Examination of the testing procedure, which may result in adjustments to it
  - b) Analyse the processes, operations, quality records sampling reports and customer complaints to see if any causes can be established
  - c) Initiate preventive actions to deal with the problems to a level corresponding to the risks encountered
  - d) Apply additional controls to ensure effective corrective actions are taken
  - e) Implement and record changes to the management system procedures involved in any corrective action
5. The PRODUCT NON-CONFORMANCE FORM is to be filled in during and after the non-conformance event has occurred.

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## **8 ENVIRONMENTAL RISK ASSESSMENT**

The environmental risk assessment for the operation is provided separately. This will be reviewed annually to ensure the findings remain applicable.

### **8.1 Exposure Pathways and Pollution Controls**

The environmental risk assessment indicates that the proposed operations will not significantly adversely impact the environment provided the site is operated in accordance with a documented EMS and relevant management plans. Some activities have the potential to impact the environment. Each of these activities will be provided with a procedure and associated form. The current procedures and forms are provided in Appendix 1 and Appendix 2. Specific management plans have been developed for fire and noise prevention and management.

The control measures identified in the risk assessment and management plans are embedded into the day-to-day operation of the site.

### **8.2 Awareness of Legal and Other Requirements**

CWS will consider all legislative requirements that have been identified as being applicable to the sites environmental aspects and will ensure that all relevant aspects of the business are aware of the legislative responsibilities and requirements.

### **8.3 Environmental Objectives & Targets**

CWS is committed to continual environmental improvement. To achieve this goal, CWS will set key environmental objectives and targets that are directly linked to the environmental risk assessment aspects and environmental policy and that are achievable and, where practicable, may be quantified.

Objectives will be identified and defined as part of the ongoing evaluation of the site's environmental performance, legal requirements and Permit requirements. Implementation of the objectives and targets will be monitored by the environmental management representative, ideally on a monthly basis, to ensure acceptable progress and to help identify any additional resources or inputs that may be required.

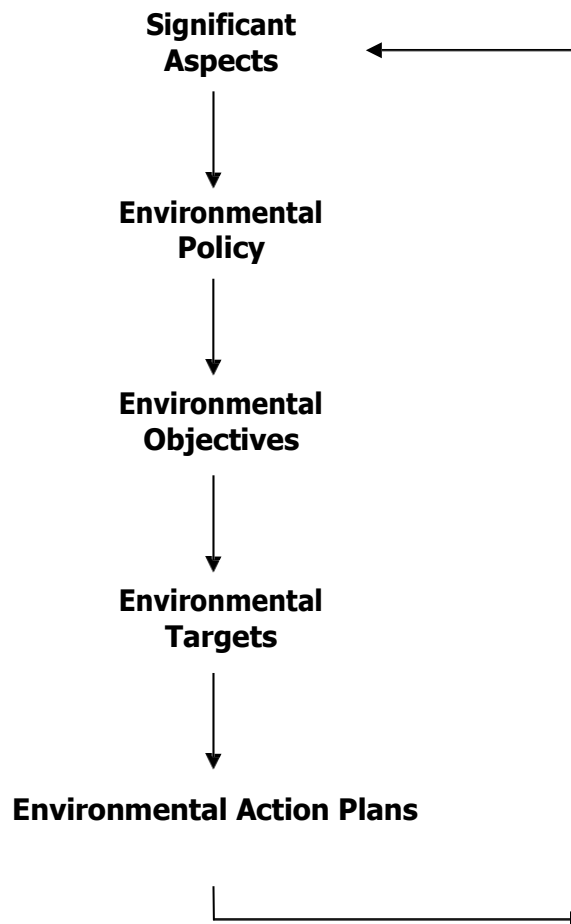
CWS recognises that the main way in which environmental improvements will be achieved and implemented is if their progress is planned and sufficient and timely resources are committed. Every environmental objective will have a documented programme behind it.

Each action plan will be assigned to designated personnel and clearly documented. The overall process to identify action plans is summarised below:



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**Flowchart 8-1 Links between Significant Aspects and Action Plans**



Action plans may be documented in different ways depending upon the type of objective, the range of personnel involved and its complexity. The environmental management representative will track the performance of the implementation of the objectives.

#### **8.4 New Objectives**

CWS recognises that the processes used to treat waste at the site could change over time as the business develops and in response to external drivers. Should new waste types, new plant, equipment, processes, and buildings be required, the environmental management representative will undertake a review of the planned changes and identify the environmental aspects that will require management during all phases of development and implementation. Such changes will likely result in new action plans being developed and possibly also Variations to the Permit.

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## **9 AMENITY MANAGEMENT**

### **9.1 Routine Site Inspections**

The Site Manager is responsible for carrying out site inspections. Inspection will allow environmental protection measures to be inspected and provide a mechanism to assess whether site operations are being carried out in accordance with the EMS. The inspections will be recorded:

- Use Form SF07 for recording site inspections

### **9.2 Fire Prevention Management Plan**

CWS has prepared and maintains an FPMP. A copy of this is retained in the site office. All personnel will be trained in the measures to follow during identification of a fire.

- See FPMP and fire drill Procedure P003.

### **9.3 Noise Management Plan**

CWS has prepared and maintains a Noise Management Plan. A copy of this is retained in the site office. All personnel will be trained in the measures to follow during identification of a fire.

### **9.4 Site Emergency Plans**

CWS has prepared a series of procedures for dealing with incidents/accidents that have the potential to cause pollution.

Summary emergency contact details for the site are provided in Table 9-1.

**Table 9-1 Emergency Contact Details**

<b>SITE DETAILS</b>			
Location: CWS, The Granary Graddfa Industrial Estate, Llanbradach, Caerphilly			
Postcode: CF83 3QS			
Site Access Grid Reference: 314792 190781			
<b>SITE CONTACTS</b>	Name	Office Hours (specify)	Out of hours
Owners	Alan	07980 710096	
	Mike	07966 269604	
<b>NEIGHBOURS</b>			
Transport for Wales		0333 3211 202	
Network Rail		03457 11 41 41	03457 11 41 41
<b>EMERGENCY SERVICES</b>		Office Hours	Out of hours
Emergency		999	999
Police:		101	101
Fire:		0370 60 60 699	999
<b>REGULATORS</b>		Office Hours	Out of hours
Health and Safety Executive (HSE)		0345 300 9923	0151 922 9235
Local Authority:		Caerphilly Council 01443 815588	01443 875500
Natural Resources Wales (Local)		0300 065 3000	0300 065 3000
<b>UTILITY/KEY SERVICES</b>	Name	Office Hours	Out of hours
Water undertaker:	Welsh Water	0800 052 0145	
Sewerage undertaker:	Welsh Water	0800 052 0145	
Electricity supplier:	SWALEC	0843 770 5091	
Vacuum tank emptying:	Egan Waste	01443 841 833	

## 9.5 Procedures for Management of Environmental Risks

In accordance with the Permit, CWS will ensure that emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. If notified by NRW that the activities are giving rise to pollution, CWS will submit to NRW an emissions management plan. This plan will be implemented from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.

### 9.5.1 Spills and Leaks

Procedures detailing the steps to take to prevent and deal with spillages are included in Procedure P004.

- See Procedure P004

### 9.5.2 Prevention of Controlled Water Pollution

Procedure P005 is in place to limit the possibility of either surface water or groundwater pollution.

- See Procedure P005

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### **9.5.3 Flooding**

Surface water run-off could result in parts of the site flooding.

Procedure P006 has been developed to deal with a potential flood event.

- See Procedure P006
- See Procedure P005 for preventing controlled water pollution

### **9.5.4 Noise and Vibration**

A procedure outlining the steps CWS will take to minimise the possibility of site noise and vibration causing nuisance to off-site receptors is included in Appendix 1.

- See Procedure P007 and Noise and vibration Management Plan

### **9.5.5 Release of Dusts, Fibres and Particulates**

Measures that will be embedded by CWS into the day-to-day operation of the site to reduce the possibility of dust and particulates being released are summarised in Procedure P008.

- See Procedure P008

### **9.5.6 Litter escape**

Procedure P009 details the steps to be taken should litter on site roads and external areas be identified.

- See Procedure P009

### **9.5.7 Mud and Debris on Roads**

Procedure P010 details the steps to be taken should mud and debris on site roads and external areas be identified.

- See Procedure P010

### **9.5.8 Nuisance from Pests**

The steps detailed in Procedure P011 should be followed for identifying and managing pests.

- See Procedure P011

### **9.5.9 Nuisance Odour**

Odorous waste should be evaluated and dealt with in accordance with Procedure P012.

- See Procedure P012

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## **10 WASTE MANAGEMENT**

Ensuring that the waste accepted at the site is in accordance with the Permit is fundamental to the operation of the site. The procedures to be followed during waste acceptance are set out in Procedure P001 and P002

- See Procedure P001
- See Procedure P002

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## **11 PLANNED PREVENTATIVE MEASURES**

### **11.1 Maintenance**

CWS recognises that many pollution incidents are a consequence of a maintenance failure. To avoid such incidents, a Planned Preventative Maintenance programme will be in place. The Plan will include routine checks of plant, machinery and site infrastructure that could influence the environment. The Plan will be directly linked to the Environmental Risk Assessment.

CWS will investigate malfunctions, breakdown or failure of plant and equipment, techniques and near misses, releases to the environment, or impacts on the local amenity.

The Plan will be documented using Form SF03 in Appendix 2.

- Use Form SF03 for implementing preventative maintenance programme

### **11.2 Pollution Prevention**

CWS will ensure that all aspects of site development are undertaken in accordance with the current Pollution Prevention Guidance issued by NRW. An independent fire risk assessment will also be commissioned.

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## **12 INCIDENTS & EMERGENCIES**

### **12.1 Accidents and Near Misses**

CWS recognises that accidents and near misses can cause pollution. For this reason, each incident or near miss will be managed and recorded in accordance with Procedure P013 and P014 and Form SF08.

- Use Procedure P013 and P014 for recording accidents and near misses
- Use Form SF08 for recording Incidents

### **12.2 Fire Prevention and Management Plan**

A separate Fire Prevention and Management Plan (FPMP) has been developed in accordance with the requirements of the Permit.

### **12.3 Planning**

CWS will assess the potential for negative environmental impacts to arise out of abnormal operating and emergency conditions using a systematic process underpinned by risk assessment. From this assessment, CWS will identify and document significant aspects to enable environmental action plans to be developed. This assessment will be reviewed at least annually and will be based on the procedures and forms included in Appendix 1 and 2.

Reviews will also be undertaken following any accidents and emergencies and in response to any employee reporting a hazard.

### **12.4 Testing of Emergency Preparedness**

CWS will periodically test all procedures where practicable, based on the drills included in Appendix 1. The results of the tests will be documented.

- Use Procedure P003 for emergency drills

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## **13 COMMUNICATION AND COMPLAINTS**

### **13.1 Internal Communication**

CWS is committed to ensuring that the requirements of the Permit and the EMS will be fully implemented. One of the keyways of achieving this is through clear communication with all employees to ensure that the requirements are understood, available and fully integrated to routine site work. This will be achieved by various means including signage, meetings, environmental awareness training sessions, tool-box talks, inductions and posters. Particular attention will be paid to ensure that sub-contractors are aware of the relevant requirements.

### **13.2 External communications**

Dialogue with external parties may include submittal of information to external parties, receipt of requests for information, receipt of complaints and dialogue with NRW. In the majority of cases, the Technically Competent Person (TCP) or Site Manager will be the initial point of contact. All communication will be documented.

Specific measures for dealing with complaints will be based on those detailed in Procedure P015 in Appendix 1.

➤ Use Procedure P015 for dealing with complaints

CWS takes complaints seriously and will take the necessary actions to investigate the complaint. If a complaint is valid CWS will:

- identify the cause.
- minimise the impact of the activity causing the problem.
- investigate the root cause of the problem.
- take steps to ensure the problem is not repeated.
- record the complaint and what actions were taken to investigate and resolve it.
- amend the EMS if necessary.

➤ All complaints will be recorded on Forms SF09 and SF10.

On April 1<sup>st</sup>, each year an Environmental Performance Report will be forwarded to NRW. The report will assess any complaints received in relation to site operations and actions taken to resolve such complaints – this will include any reviews of site operations.



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## **14 MONITORING AND MEASUREMENT**

### **14.1 Proof of Control**

CWS recognises that a key aspect of any EMS is to document the operation of the EMS so that its effectiveness can be scrutinised and any shortcomings identified. This will be achieved through thorough relevant training and routine assessment of working instructions and records for both employees, contractors and suppliers. Such records will be recorded using the forms in Appendix 2.

### **14.2 Monitor and Measure**

CWS will document implementation of the proposed waste operation and pollution control measures using the forms in Appendix 2. Records shall include waste acceptance, waste delivery and preventative maintenance programmes.

---

## **15 INTERNAL AND EXTERNAL**

### **15.1 Internal EMS Audits**

The environmental management representative will establish a rolling audit programme that ensures each aspect of the EMS is audited at least annually. More frequent audits will be undertaken on the more sensitive procedures and aspects. The principle aim of the audit will be to determine whether or not the EMS conforms to planned expectations and is being effectively implemented and maintained. The environmental management representative will provide feedback to management regarding the audit process. The audit findings will be recorded.

- Form SF13 will be used for planning the audit programme and Form SF14 for recording the findings. Form SF11 will be used for documenting non-conformances and SF12 for documenting any preventative actions implemented.

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## **16 NON-CONFORMANCE, CORRECTIVE & PREVENTIVE ACTION**

### **16.1 Continual Improvement**

Through monitoring of performance, CWS will seek to identify non-conformance issues requiring action to ensure continued environmental performance and full implementation of the EMS. CWS will seek to identify non-conformance issues through a variety of means including outcomes of audits, incident reports, reviews of legislation requirements and complaints.

- Form SF11 shall be used for recording such non-conformances.

### **16.2 Investigation of Failings**

Following identification of non-conformance issues, the environmental management representative will lead an investigation into the root causes and identify ways in which the issues can be avoided in the future. The review will also aim to identify any ways in which the EMS may be improved. This may require specialist input from internal and external parties. This process will lead to corrective and preventative action plans being developed and tracked.

- Form SF12 shall be used for recording preventative actions

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## **17 RECORDS, REPORTING AND NOTIFICATIONS**

The Permit will require records to demonstrate that the activities are in compliance with the EMS.

### **17.1 Controlled documents**

This EMS details the relevant procedures and forms that will be required to document the proposed waste activity. All documents will be controlled and issued by the Technically Competent Person (TCP). One of the responsibilities of the environmental management representative is the maintenance of this documentation.

### **17.2 Location of documents**

All relevant documents will be available on site and routinely backed up.

### **17.3 Review, Update and New Documentation**

CWS will periodically review the EMS. Only authorised personnel are able to make amendments to documentation in consultation with the TCP Environmental management. All employees will, however, be encouraged to provide feedback regarding the documentation to ensure it remains fit for purpose.

### **17.4 Document Issue and Removal**

CWS will ensure that all current versions of the documentation are reviewed, updated and issued to all the relevant parties. Any documentation not required will be clearly identified through the use of an obsolete records system.

### **17.5 Document and Record Retention**

CWS will ensure that all documentation will:

- be legible.
- be made as soon as reasonably practicable.
- if amended, be amended in such a way that the original and any subsequent amendments remain legible or are capable of retrieval.
- be retained for at least 6 years unless they relate to off-site environment effects or matters relating to the condition of the land, groundwater and surface water, in which case they will need to be retained until the Permit is surrendered.

### **17.6 Reporting to NRW**

CWS will report relevant waste records to NRW at the required intervals set out in the Permit.

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## **17.7 Notifying NRW**

CWS shall notify NRW without delay the detection of:

- any malfunction, breakdown or failure of equipment or techniques, accident or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution.
- the breach of a limit specified in the Permit.
- any significant adverse environmental effects.

Written confirmation of actual or potential pollution incidents and breaches of emission limits shall be submitted to NRW within 24 hours.

CWS will notify NRW within 14 days of the occurrence of the following matters:

- any change in the operator's trading name, registered name, or registered office address.
- any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

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## **18 PERMIT SURRENDER**

Should CWS wish to surrender the Permit at some point, NRW will need to be convinced that necessary measures to avoid any pollution risk resulting from the waste activities have been taken.

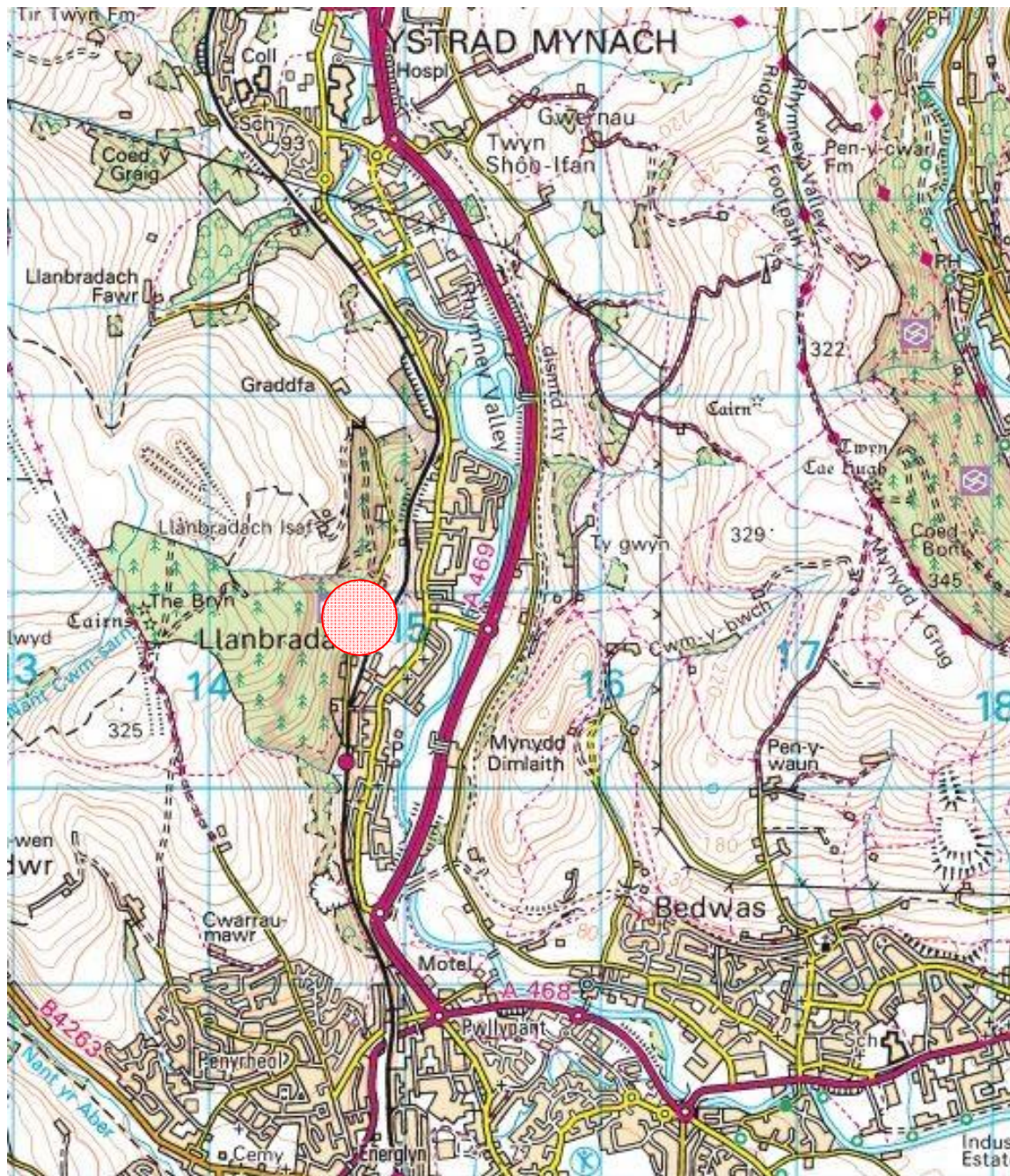
The legal test for surrender is – “that the necessary measures have been taken:

- (a) to avoid a pollution risk resulting from the operation of the regulated facility; and
- (b) to return the site of the regulated facility to a satisfactory state, having regard to the state of the site before the facility was put into operation.”

Provided the site is operated in accordance with the Permit and records are maintained that show waste acceptance and pollution control measures have been implemented, the land quality should not be altered. During operations, CWS will ensure that the relevant records are maintained. This will ensure that several lines of evidence demonstrating the legal test has been satisfied are gathered during operations and available for surrender.

The Site Condition Report documents land quality aspects at the site prior to the Permit.

**Figure 1 Site Location Plan**



Reproduced from the Ordnance Survey Land Ranger Map  
with the permission of The Controller of Her Majesty's Stationery Office  
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Figure 2 Key Features of Surrounding Area

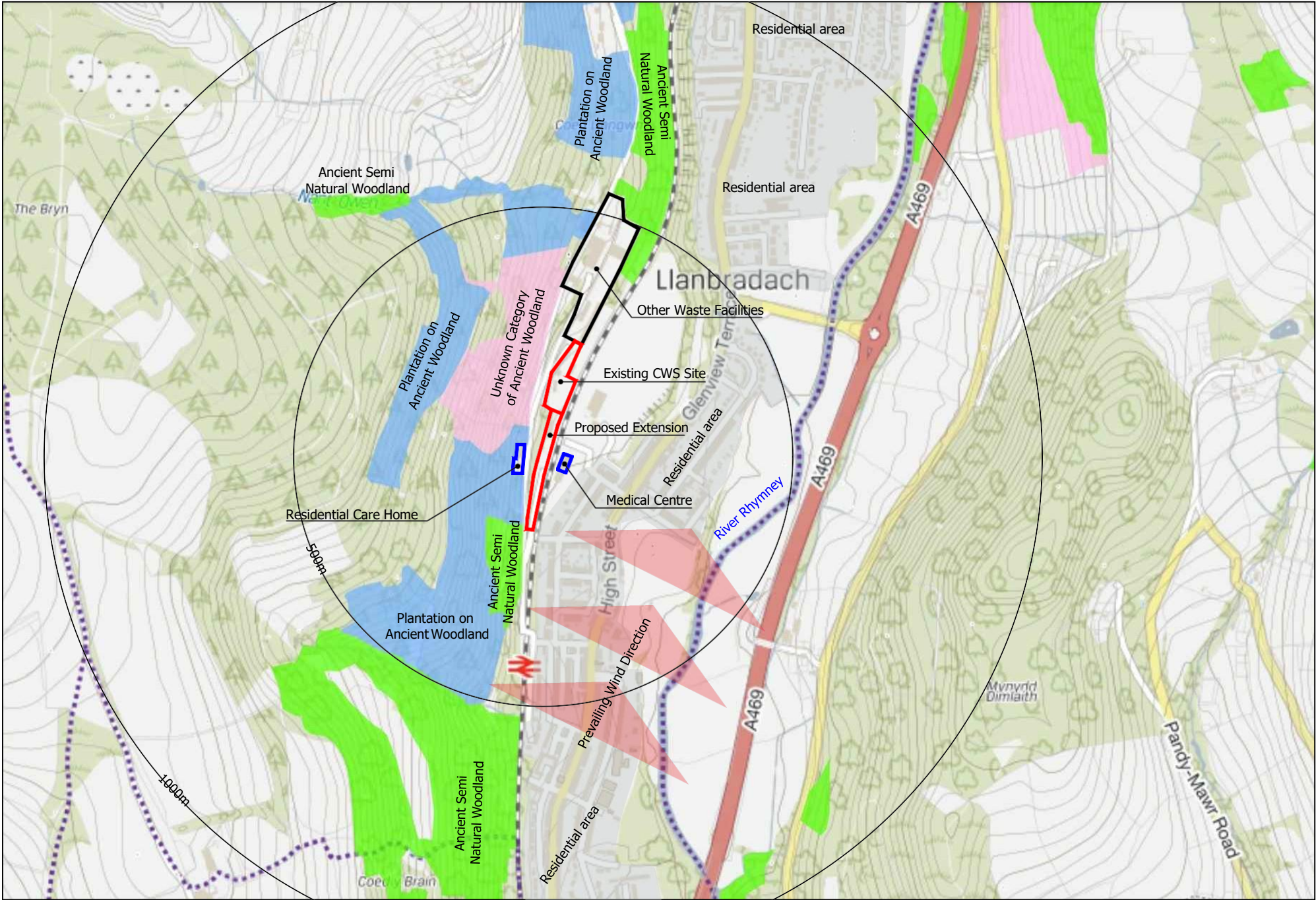




Figure 3 Site Plan

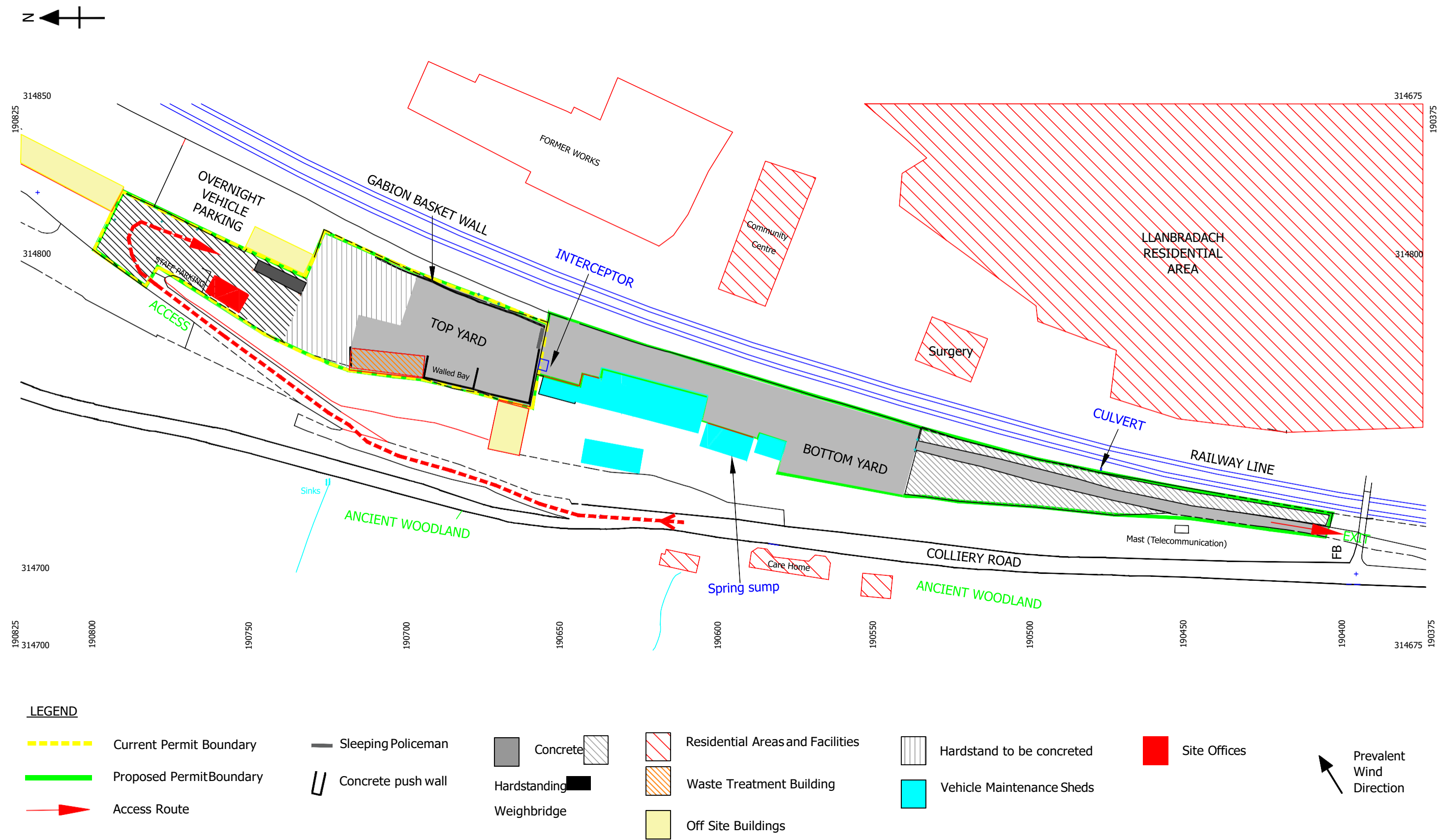




Figure 4 Photographs of Site



1888 - View South towards Entrance



1883 - Existing Buildings



0028 - ROROs in Top Yard



1871 - Bottom Yard Concrete



1868 - View North Over Railway Line



1867 - View North towards Site Exit onto Colliery Road



1885 - View towards Offices and Weighbridge



1881 - Soil and Stone



1878 - Trommel in Building



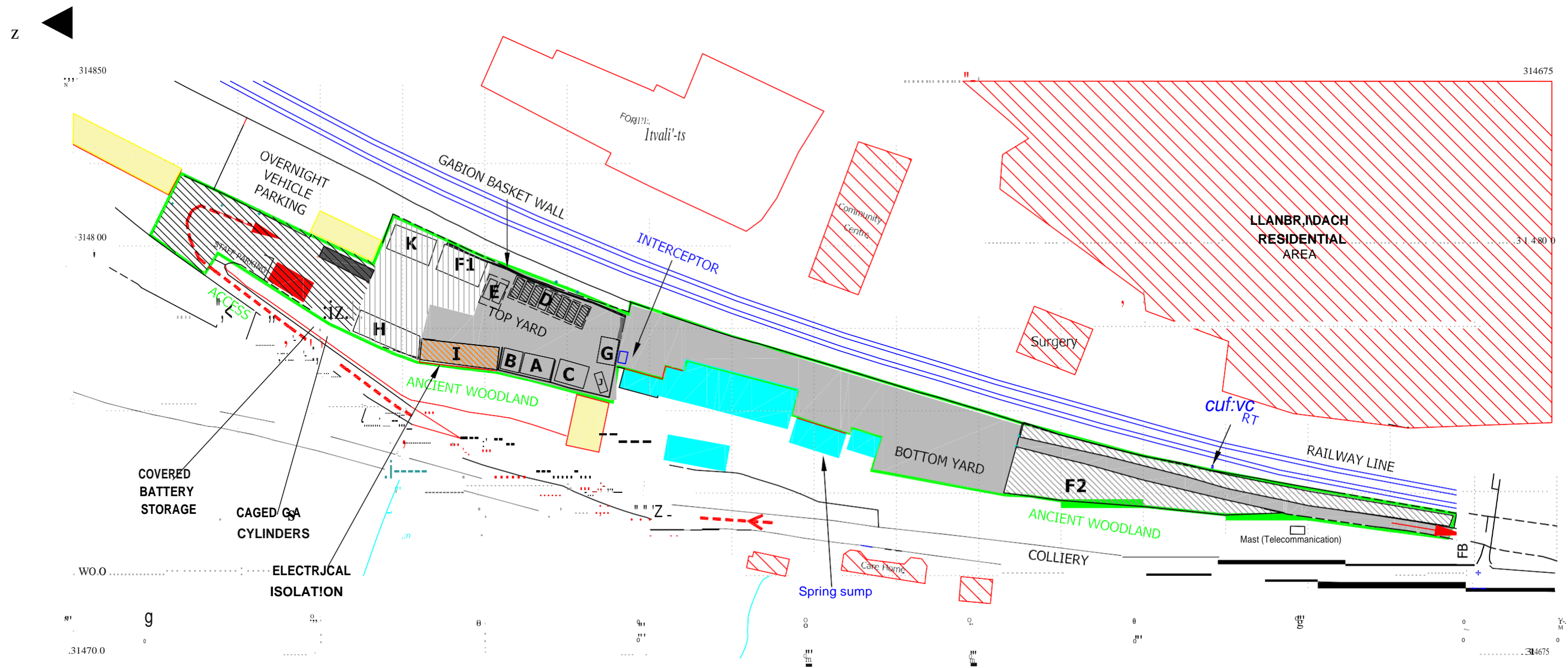
1870 - Empty Skip Storage Area



0033 - View South of exit route



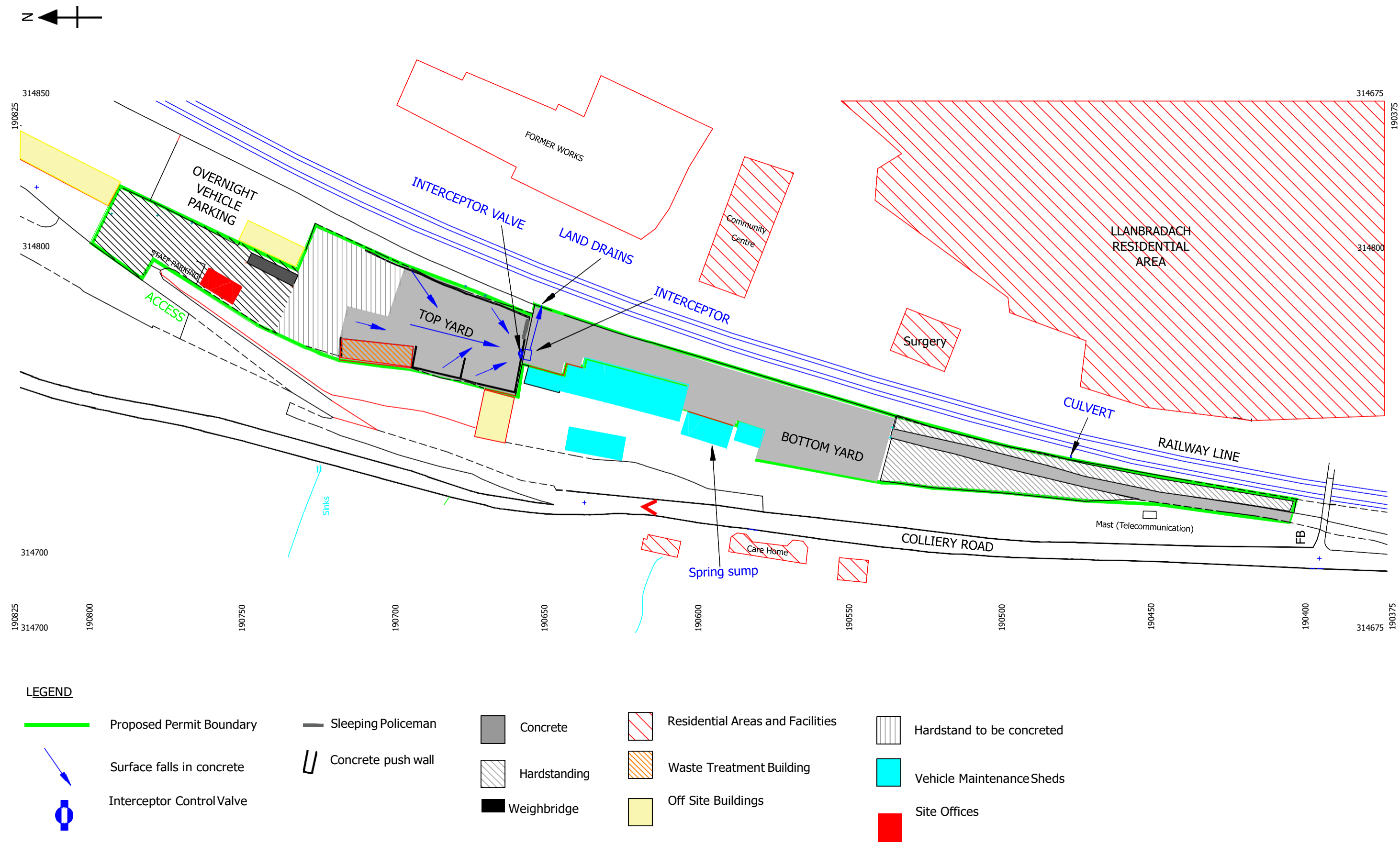
Figure 5 Site Layout



LEGEND

- |                          |                                  |                           |  |   |   |
|--------------------------|----------------------------------|---------------------------|--|---|---|
| Proposed Permit Boundary | Sleeping Policeman               | Hardstand to be concreted | <b>A</b> Sorting Area                          | <b>E</b> Emergency Quarantine                         | <b>I</b> Tremmel, Picking Line              |
| Access Route             | Concrete push wall               | Vehicle Maintenance Sheds | <b>B</b> Inert Materials                       | <b>F</b> Empty Skip Storage                           | <b>J</b> Secure Asbestos Skip               |
| Concrete                 | Residential Areas and Facilities | Site Offices              | <b>C</b> Non Recyclables                       | <b>G</b> Wood   | <b>K</b> Wood Shredding and Product Storage |
| Hardstanding             | Waste Treatment Building         | Prevalent Wind Direction  | <b>D</b> Recyclates in ROROs                   | <b>H</b> Soil and Stone Screening and Product Storage |   |
| Weighbridge              | Off Site Buildings               |                           | <b>O</b> 6m x 2.4 m RORO skip (drawn to scale) |   |   |

Figure 6 Site Drainage



**CAERPHILLY SKIPS  
BESPOKE PERMIT  
VARIATION**

**ENVIRONMENTAL  
MANAGEMENT SYSTEM**

**Appendix 1  
Procedures**

*Report Number 1960r2v2d0520*

## Procedure 001

### CWS Ltd EMS

<b>PROCEDURE TITLE</b>	<b>Waste Acceptance</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

#### Link to Environmental Aspects Assessment

<b>Environmental Aspect Ref:</b>	<b>Aspect Description</b>	<b>Link to Aspect &amp; Impact Assessment</b>
All aspects	All aspects of environmental risk assessment	Waste acceptance has potential to impact all risks at the site

#### Overview & Scope

<b>Description</b>
Actions to be followed during acceptance and inspection of waste

#### Legal & Other Requirements

<b>Requirement</b>	<b>Description</b>
<b>Permit condition 2.2</b>	Waste acceptance procedures to be in place
<b>Permitting guidance</b>	

#### Responsible Persons

<b>Responsibility</b>	<b>Responsible Person</b>	<b>Contact No (if applicable)</b>
Procedure owner		
Implementation of procedure		
<b>Responsibility</b>	<b>Other Responsible Person (e.g. Sub-contractor)</b>	<b>Contact No</b>

## Procedure 001

### Procedure

#### Steps to be taken

##### Pre-acceptance checks

Pre-acceptance checks will be carried out to limit the opportunity of non-confirming wastes being delivered. This will most likely be done via telecommunication or email and will be aimed at ensuring that only suitable waste is accepted for treatment.

The checks will be made with the customer (typically either a waste producer or waste carrier) as part of the booking process for waste collection or delivery.

The following information will be requested from all customers prior to booking in for acceptance:

- EWC code and details of process of production
- Quantity of waste
- The physical form of the waste material e.g. loose, baled

Only when the customer has provided sufficient information will the waste be scheduled for collection or delivery.

The potential exception to this approach may be small one off loads. These will be evaluated on a case by case basis.

##### Waste Acceptance – Skip Waste

All records relating to waste acceptance and despatch are gathered digitally using SkipTrak software.

1. Ideally, a minimum of 24 hours notification (or less by arrangement) of waste being delivered to site shall be implemented, particularly if the waste is arising from a site where CWS does not have control over the waste or its transportation. Prior to any waste leaving for delivery to the site, CWS will ensure that the Waste Producer is aware of their Duty of Care requirements, the limitations of the site Permit and a pre-acceptance check has been made
2. Prior to the waste being brought to the site the waste must be classified by the Waste Producer. The producer must provide information with respect to the waste's relevant EWC code, appearance and process applied to create the waste.
3. On delivery, the waste carrier (in most cases CWS) shall present a Duty of Care certificate/ Waste Transfer Note (WTN) at the weighbridge/ site office. This is to be compared against the initial enquiry and the Waste Producers waste classification. If they are unable to produce valid certification, the waste may be rejected and the incident recorded in the site diary.
4. If the waste is NOT as described or is not accepted within the terms of the Permit it shall be deemed to be NON-COMPLIANT. All non-compliant wastes shall be rejected and the incident recorded on Form F002 NON-COMPLIANT WASTE FORMS.
  - Use Form F002 for recording non-compliant waste
5. If valid certificates are produced and have been reviewed, a visual inspection of the waste should be undertaken. This is to ensure the waste is in compliance with the Transfer Note, the Permit and the driver's description.
6. All NEW waste carrier drivers are to undergo site induction.
7. If the waste IS acceptable, the following information shall be recorded on Form F001 RECORD OF WASTE DELIVERIES RECORD FORM held at the site office:
  - a) Category/EWC Code of the waste
  - b) Time of delivery
  - c) Vehicle Registration
  - d) Site address of waste
  - e) Name of waste carrier
  - Use Form F001 for recording waste deliveries

## Procedure 001

### Waste Delivery to Working Area

1. The driver shall be given directions to the waste reception point
2. If any new drivers are unsure of the correct location, the Operations manager and the operating staff will ensure the waste lorry arrives at its correct destination.
3. The operational staff will guide the waste lorry driver to the correct area for controlled discharge.
4. The waste receiving areas will be clearly marked with a sign to ensure no cross-contamination of waste streams.

### Identification and Management of Non-conforming Wastes

Following tipping/delivery of the waste into the correct sorting area the waste will be visually inspected whilst the delivery driver is still present. Particular attention will be paid to identifying non-permitted wastes that could increase the site fire risk, such as Lithium batteries.

If non-compliant wastes are identified the load will be rejected and sent back to the waste producer where it originated from. The occurrence of such wastes will be recorded on Form F002 NON-CONFORMANCE WASTE FORM. A comment may also be made in the Site Diary. The information to be recorded will include:

- a) Date and Time
- b) Description of Waste
- c) Details of Non-compliant waste
- d) Details of action taken
- e) Name and address of Waste producer
- f) Vehicle Type
- g) Vehicle Registration
- h) Waste Carrier Details
- i) Waste Transfer Note Number
- j) Details of final waste destination

➤ Use Form F002 for recording non-conformance wastes

If, in the interests of the environment, it would be best to allow the load to be stored on site, then the non-permitted waste shall be temporarily retained on site in the quarantine area.

If necessary, NRW shall be informed by telephone immediately and a record kept of the conversation and with whom. Steps taken to safely dispose of the waste (after liaison with NRW) should be documented– typically this will involve returning it to the waste producer.

### Method Statement of Treatment

1. All operational staff are to be fully trained in the waste recycling operations including:
  - a) Location of different wastes to be treated
  - b) Types of waste to be treated
  - c) Treatment processes
  - d) Storage of treated waste

2. Operational staff will be informed by the plant foreman or the managing director of the plant equipment to use to treat the waste
3. The recycling process will involve the operation of dedicated equipment.

Records of maintenance of these pieces of equipment will be kept in accordance with MAINTENANCE RECORDS.

➤ Use Form F003 for recording preventative maintenance checks



## Procedure 001

4. Relevant operational staff will be trained in the operation of the plant and a record of this training kept at the site office in accordance with TRAINING RECORDS.
- Use Form F004 for recording training

### Waste Acceptance – Asbestos Waste

Asbestos waste shall only be accepted at the site if it is contained within appropriate packaging.

All wastes received at the site shall be inspected on receipt by a suitably qualified person

- i) to confirm its acceptability under the terms of this licence, and
- ii) to confirm the protective packaging has not been damaged or compromised.

In the event of the packaging being damaged the packaging and waste shall be sprayed by fibre suppressant and the waste bags overbagged. Damage of the outer transparent bag will be detectable by the appearance of the 'balloon', property of the bag being deflated.

Damage to the inner and outer bag will be dealt with by re-bagging with an inner (Red) plastic bag, sealing the bag and double bagging with a transparent outer bag, again sealed. During re-bagging, both inner and outer bags will be sealed with the fibre suppressant liquid referred to above.

Asbestos waste shall be stored in a secure enclosed, lockable container. The container shall be kept locked when not being loaded and unloaded with waste.

### Acceptable Performance Criteria

A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance

Measure	Target / Requirement
Waste fraction not recycled	Zero waste to landfill

### Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

### Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Form F001 Record of Waste Deliveries (implemented through Skip Trak)	Office
Form F002 Non-conforming wastes	Office

## Procedure 002

### CWS Ltd EMS

<b>PROCEDURE TITLE</b>	<b>Discovery of Suspicious Item in Waste</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

#### Link to Environmental Aspects Assessment

<b>Environmental Aspect Ref:</b>	<b>Aspect Description</b>	<b>Link to Aspect &amp; Impact Assessment</b>
All aspects	All aspects of environmental risk assessment	Waste acceptance has potential to impact all risks at the site

#### Overview & Scope

<b>Description</b>
Actions to be followed if suspicious item discovered in waste following acceptance

#### Legal & Other Requirements

<b>Requirement</b>	<b>Description</b>
<b>Permit condition 2.2</b>	Waste acceptance procedures to be in place
<b>Permitting guidance</b>	

#### Responsible Persons

<b>Responsibility</b>	<b>Responsible Person</b>	<b>Contact No (if applicable)</b>
Procedure owner		
Implementation of procedure		
<b>Responsibility</b>	<b>Other Responsible Person (e.g. Sub-contractor)</b>	<b>Contact No</b>

## Procedure 002

### Procedure

Steps to be taken
<p>If a suspicious item is discovered the following procedures will be adopted.</p> <ul style="list-style-type: none"><li>• Stop work and make others working nearby aware of discovery</li><li>• Move all personnel away from area to muster point</li><li>• Inform site foreman / Senior Manager immediately.</li><li>• Inform Emergency services using 999 if there is a fire risk</li><li>• Site to remain under the control of the senior emergency officer until the emergency/incident is over.</li></ul> <p>➤ Use Form F002 to record non-compliant wastes</p>

### Acceptable Performance Criteria

A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance

Measure	Target / Requirement
Record of non-compliant wastes	Zero non-compliant wastes each year

### Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

### Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Form F002 Non-compliant wastes	Office

## Procedure 003

### CWS Ltd EMS

<b>PROCEDURE TITLE</b>	<b>Undertaking a Fire Drill</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

#### Link to Environmental Risk Assessment Aspects

<b>Environmental Aspect Ref:</b>	<b>Aspect Description</b>	<b>Link to Aspect &amp; Impact Assessment</b>
ASP11, 12	Fire risk	Fire drills will enable site to be prepared for potential fire

#### Overview & Scope

<b>Description</b>
Steps to be followed during a fire drill

#### Legal & Other Requirements

<b>Requirement</b>	<b>Description</b>
<b>Permit condition 3.4</b>	Operate site in accordance with Fire Prevention Plan
<b>Permitting guidance</b>	

#### Responsible Persons

<b>Responsibility</b>	<b>Responsible Person</b>	<b>Contact No (if applicable)</b>
Procedure owner		
Implementation of procedure		
<b>Responsibility</b>	<b>Other Responsible Person (e.g. Sub-contractor)</b>	<b>Contact No</b>

## Procedure 003

### Procedure

#### 'Normal & Abnormal' Operating Conditions (overview of standard operations)

A fire drill is intended to ensure, by means of training and rehearsal, that in the event of fire:

- The people who may be in danger act in a calm and orderly manner. Where necessary those designated carry out their allocated duties to ensure the safety of all concerned.
- The means of escape are used in accordance with a pre-determined and practised plan.
- If evacuation of the building becomes necessary, staff should be aware of what to do.

Where there are alternative means of escape the drill should be based on the assumption that one or more of the escape routes cannot be used because of a fire. During these drills a member of staff who is told of the supposed outbreak should operate the fire alarm and, thereafter, the fire routine should be rehearsed as circumstances allow. This may raise some difficulties where members of the public are present, but such a procedure is still desirable.

It should also be remembered that regular fire drills test the procedures and training that you have put in place for the safe and effective evacuation of **disabled and infirm employees and visitors**. British Standard 5588 Part 8 Code of Practice for means of escape for disabled people gives guidance on this matter. . In cases where there are profoundly deaf people employed, then an alternative alarm may need to be in place. Technical advice on such alarms can be obtained from the Royal National Institute for the Deaf, 105 Gower Street, London WC1E 6AH.

#### Conducting a Fire drill

Normally advance warning should **not** be given of the fire drill. However, you can individually warn anyone who may need to know in advance. Every opportunity should be taken to learn lessons from the drill and to reinforce staff training where gaps are identified. It is good practise to appoint a small number of people, usually safety representatives or managers to observe the drills and highlight areas of concern. It is important that all managers are aware of the procedures, as employees will naturally look towards them in an emergency.

No.	Check List	Yes/No/NA
Comments		
1	Agree the scenario, extent and aim of the exercise with senior management.	
2	Assemble a multi-disciplinary exercise planning team and agree the objectives for each area to be exercised.	
3	Sketch out and then develop the main events of the exercise and associated timetables.	
4	Determine and confirm the availability of the outside agencies to be involved.	
5	List the facilities required for the exercise and confirm their availability e.g. transport, buildings and equipment.	
6	Ensure that all communications to be used during the exercise have been tested at some stage prior to the exercise.	
7	Check that Umpires for each stage of the exercise are clearly identified and properly briefed.	
8	Ensure that directing staff are clearly identified and properly briefed and have good independent communications with "exercise control" throughout the exercise.	
9	If the exercise links a number of activities or functions which are dependent on each other, confirm that each has been individually tested beforehand.	
10	Ensure that all participants have been briefed.	
11	Ensure that all players are aware of the procedures to be followed if a real emergency occurs during the exercise.	

**Procedure 003**

12	If spectators are to be invited ensure that they are clearly identified and properly marshalled, and arrange for them to be kept informed of the progress of the exercise. Ensure their safety.		
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## Procedure 003

13	Ensure that where appropriate outside agencies are indemnified in the event of exercise accident.		
14	If relevant, warn emergency services switchboards / controls and any neighbours who might be worried or affected by the exercise. .		
15	Ensure that senior management, directing staff, Umpires and key players are aware of the time and location for the "hot" debrief, and circulate a timetable for a full debrief.		
16	Agree and prepare a detailed set of recommendations, each one accompanied by an action addressee and timescale.		
17	Prepare a clear and concise summary report of the exercise to distribute to all organisations and groups which took part, together with major recommendations.		
18	Discuss with senior management the outcome of the exercise and agree the future exercise programme.		
19	Thank all personnel and outside agencies which took part.		

➤ **Use Form F006 to record the findings of the drill**

### Acceptable Performance Criteria

A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance

Measure	Target / Requirement
Time taken to evacuate all personnel	3 minutes

### Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

### Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Form F006 for recording findings of fire drill	Office

## Procedure 004

### CWS Ltd EMS

<b>PROCEDURE TITLE</b>	<b>Spillage/Leakage Response</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

#### Link to Environmental Aspects Assessment

<b>Environmental Aspect Ref:</b>	<b>Aspect Description</b>	<b>Link to Aspect &amp; Impact Assessment</b>
ASP13	Spillage posing risk to controlled water	Spillages could impact surface water and groundwater

#### Overview & Scope

<b>Description</b>
Actions to be undertaken in response to spillage or leakage

#### Legal & Other Requirements

<b>Requirement</b>	<b>Description</b>
<b>Permit condition 3.1</b>	Control of emissions that may give rise to pollution
<b>Permitting guidance</b>	

#### Responsible Persons

<b>Responsibility</b>	<b>Responsible Person</b>	<b>Contact No (if applicable)</b>
Procedure owner		
Implementation of procedure		
<b>Responsibility</b>	<b>Other Responsible Person (e.g. Sub-contractor)</b>	<b>Contact No</b>



## Procedure 004

### Procedure

Steps to be taken if safe to do so
<p>Pollution may result from accidental leaks or spillages from plant and vehicles or from non-permitted wastes discovered in loads and destined for quarantine as an unacceptable waste.</p> <p><b>Spillage / Leakage – Steps to be taken</b></p> <p>The following procedure is adopted for all accidental spillages of liquids whether inside buildings or in yard areas. Responsibility for any spillage lies with the first person noticing or finding the spill and they must take steps to contain it by taking action as follows:</p> <p>If there is a fire or medical attention needed, contact emergency services on 999.</p> <p>Attend to any people who may be contaminated. Contaminated clothing should be removed immediately and the skin flushed with copious amounts of water until emergency assistance arrives. Take advice from 999 call handler where relevant.</p> <p>If a volatile, flammable material is spilled, immediately warn everyone, control sources of ignition and ventilate the area.</p> <p>Personal Protective Equipment to be used as appropriate to the Hazards. Refer to the Material Safety Data Sheet or other references to information. Obtain PPE from Emergency Box.</p> <p>If safe to do so, stop the spill / leak if still occurring:</p> <ul style="list-style-type: none"><li>- Block off any local discharge points using sand bags / spill booms / spill mats e.g. drains and other routes of liquid escape</li><li>- Area surrounding spillage to be isolated by application of absorbent granules or sand / soil to prevent vehicles or personnel from passing over the area and thus spreading the spilled liquid. Apply the loose spill control materials working from the outside, circling to the inside. This reduces the chances of splash or spread of the spilled chemical.</li></ul> <p>When spill materials have been absorbed use brush and scoop to place materials in appropriate container. Polyethylene bags may be used for small spills. 5 gallon drums or 20 gallon drums with polyethylene liners may be appropriate for larger quantities.</p> <ul style="list-style-type: none"><li>- Site manager notified as soon as possible</li><li>- Spill mats and spill kits, including absorbent granules, are to be spread on the spilled liquid until all is absorbed.</li><li>- When all the liquid is absorbed, the contaminated spill kits will be loaded into a suitable drum for removal by a suitably licensed carrier to a licensed disposal or recovery facility.</li></ul> <p>Decontaminate the surface where the spill occurred using suitable detergents and water, when appropriate.</p> <ul style="list-style-type: none"><li>- Every instance of spill MUST be recorded and investigated as an accident or incident.</li></ul> <p><b>Ongoing leakage – Steps to be taken</b></p> <p>In addition to the above procedures, if a leakage is ongoing and the valve cannot be closed arrangements will be made to have the contents transferred or captured to an alternative container.</p> <p><b>Spillage from a vehicle – Steps to be taken</b></p> <p>In the event of a Spillage or leak that may occur from a vehicle during carriage or when stationary, the members of the vehicle crew shall take the following actions where safe and practicable to do so:</p> <ul style="list-style-type: none"><li>Apply the braking system, stop the engine and isolate the battery by activating the master switch where available</li><li>Avoid sources of ignition, in particular, do not smoke or switch on any electrical equipment</li><li>Inform the appropriate emergency services, giving as much information about the incident and</li></ul>

## Procedure 004

substances involved as possible.

Put on warning vest and place the self-standing warning signs as appropriate;  
Keep transport documents readily available for responders on arrival.  
Do not walk into or touch spilled substances and avoid inhalation of fumes, smoke, dusts and vapours by staying up wind;  
Where appropriate and safe to do so, use on-board spill kit equipment to prevent leakages into aquatic environment or the sewage system and to contain spillages;  
Remove any contaminated clothing and used contaminated protective equipment and dispose of it safely;  
Move away from the vicinity of the spillage, advise other persons to move away and follow the advice of the emergency services.

### Practice Spill Drills

Spill drills should be performed to check the effectiveness of procedures, equipment and personnel and to identify improvements.

➤ Use Form F013 for recording spill drills

### 'Emergency' Operating Conditions (System out of control)

**In the event of a major spillage implement as much as possible of the measures identified above but focus on the safety of personnel and do not implement any steps if there is a risk to human health.**

### Acceptable Performance Criteria

A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance

Measure	Target / Requirement
Check for presence of spill kits Check liquids are provided with correct bunding Check liquid transfer techniques are working correctly	Weekly

### Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

### Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Form F007 Inspection sheet	Office
Form F003 Preventative Maintenance Programme	Office
Form F004 Spill Kit training records	Office
Form F013 Spill Drill	Office

## Procedure 005

### CWS Ltd EMS

<b>PROCEDURE TITLE</b>	<b>Preventing Pollution of Controlled Water</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

#### Link to Environmental Aspects Assessment

<b>Environmental Aspect Ref:</b>	<b>Aspect Description</b>	<b>Link to Aspect &amp; Impact Assessment</b>
ASP11 – ASP17	Protection of controlled water	Liquids issuing from the site could impact surface water and groundwater

#### Overview & Scope

<b>Description</b>
Actions to be undertaken to protect surface water and groundwater

#### Legal & Other Requirements

<b>Requirement</b>	<b>Description</b>
<b>Permit condition 3.1</b>	Control of emissions that may give rise to pollution
<b>Permitting guidance</b>	

#### Responsible Persons

<b>Responsibility</b>	<b>Responsible Person</b>	<b>Contact No (if applicable)</b>
Procedure owner		
Implementation of procedure		
<b>Responsibility</b>	<b>Other Responsible Person (e.g. Sub-contractor)</b>	<b>Contact No</b>

## Procedure 005

### Procedure

Steps to be taken if safe to do so
<p>Pollution may result from accidental leaks or spillages from waste, plant and vehicles or from liquid wastes discovered in loads and destined for quarantine as an unacceptable waste.</p> <p>➤ Use Procedure P004 for dealing with spillages and leaks.</p> <p>To ensure site containment and drainage systems are functioning as intended they will be inspected weekly. The results of each site inspection shall be recorded on the site inspection form.</p> <p>➤ Use Form F007 for recording Site Inspections</p> <p>Any maintenance and repair works will be carried out at the earliest opportunity.</p> <p>As the processing of waste occurs indoors there is a very low risk of pollution impacting surface water or groundwater. The area where the general skip waste is processed is also provided with an interceptor and this will be emptied when required and inspected.</p> <p>The external areas of the site and surface drains will be inspected. The focus will be on identifying aspects that could influence the behaviour and flow directions of potential spills and leaks.</p> <p>Storage of all liquids covered by COSHH should be assessed.</p> <p>➤ Use Form F014 for COSHH assessment</p>

'Emergency' Operating Conditions (System out of control)

### Acceptable Performance Criteria

A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance

Measure	Target / Requirement
<ul style="list-style-type: none"><li>• Check for presence of spill kits</li><li>• Check liquids are provided with correct bunding</li><li>• Check liquid transfer techniques are working correctly</li></ul>	<ul style="list-style-type: none"><li>• Weekly</li></ul>

### Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

## Procedure 005

### Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Site Inspection sheets (Form 007)	Office
Preventative Maintenance Programme (Form F003)	Office
Spill Kit training records (Form FF004)	Office
COSHH assessment (Form F014)	Office

## Procedure 006

### CWS Ltd EMS

<b>PROCEDURE TITLE</b>	<b>Response to Flooding of Site</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

#### Link to Environmental Aspects Assessment

<b>Environmental Aspect Ref:</b>	<b>Aspect Description</b>	<b>Link to Aspect &amp; Impact Assessment</b>
ASP9	Flooding of site	Flooding could mobilise waste from the site

#### Overview & Scope

<b>Description</b>
Actions to take if flooding is expected or expected to occur

#### Legal & Other Requirements

<b>Requirement</b>	<b>Description</b>
<b>Permitting guidance</b>	Planning for emergencies

#### Responsible Persons

<b>Responsibility</b>	<b>Responsible Person</b>	<b>Contact No (if applicable)</b>
Procedure owner		
Implementation of procedure		
<b>Responsibility</b>	<b>Other Responsible Person (e.g. Sub-contractor)</b>	<b>Contact No</b>

## Procedure 006

### Procedure

Steps to be taken
<p>The site is at risk from surface water flooding from run-off and springs draining the high ground to the west of the site. Such an event could occur during prolonged heavy periods of rainfall.</p> <p>If the site was to flood some of the waste (particularly asbestos) could pose a risk to the environment. This procedure is aimed at limiting the risks to land and water.</p> <p>Natural Resources Wales and the Met Office provide flood warnings up to five days in advance. If a severe weather or flood warning is issued the following actions should be considered and undertaken as appropriate:</p> <p>Hazardous materials either secured or moved to a suitable and safe location where they cannot be affected by flood water.</p> <ul style="list-style-type: none"><li>- Drains and pipes checked and cleared of any debris to aid flow of water.</li><li>- Plant and machinery moved off-site where relevant</li><li>- Move any waste off-site where possible e.g. temporarily return to customer or move to another recycling facility</li><li>- Place sand bags / soil bund around sensitive areas.</li><li>- Electricity supply turned off if water levels increase or likely to increase to a dangerous level.</li></ul> <p>If a flood does occur:</p> <ul style="list-style-type: none"><li>- Electricity to site turned off, if safe to do so, and staff instructed to stay away from electrical outputs and devices.</li><li>- Site evacuated and staff to report to assembly point at Site entrance</li><li>- Emergency services and Natural Resources Wales notified.</li></ul> <p>Before site re-occupation, potential hazards and issues will be identified and guidance from Natural Resources Wales and Local Emergency Services will be sought.</p>

### 'Emergency' Operating Conditions (System out of control)

**If the situation is too dangerous to prepare the site for flooding then evacuate all personnel and inform Emergency Services and NRW.**

### Acceptable Performance Criteria

A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance

Measure	Target / Requirement
Spill Kit checks	Monthly
Visual inspection of drainage	Weekly

## Procedure 006

### Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

### Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Inspection sheets (Form F007)	Office
Env Incidents (Form F008)	Office
Spill Kit training records (Form F003)	Office



## Procedure 007

### CWS Ltd EMS

<b>PROCEDURE TITLE</b>	<b>Preventing Noise and Vibration causing Nuisance</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

#### Link to Environmental Aspects Assessment

<b>Environmental Aspect Ref:</b>	<b>Aspect Description</b>	<b>Link to Aspect &amp; Impact Assessment</b>
ASP6	Release of noise from site	Noise can cause nuisance off-site

#### Overview & Scope

<b>Description</b>
Actions to be undertaken to prevent off-site nuisance from noise and vibration

#### Legal & Other Requirements

<b>Requirement</b>	<b>Description</b>
<b>Permit condition 3.1</b>	Control of emissions that may give rise to pollution
<b>Permitting guidance</b>	

#### Responsible Persons

<b>Responsibility</b>	<b>Responsible Person</b>	<b>Contact No (if applicable)</b>
Procedure owner		
Implementation of procedure		
<b>Responsibility</b>	<b>Other Responsible Person (e.g. Sub-contractor)</b>	<b>Contact No</b>

## Procedure 007

### Procedure

Steps to be taken if safe to do so
<p>Noise is only likely to occur as a result of the movement of plant and vehicles on site or during use of recycling equipment. There are few receptors in close proximity that could be affected by these activities and the site is located in an industrial estate.</p> <p>All vehicles and plant used at the facility will be well maintained and subject to a preventative maintenance programme.</p> <p>The Site Manager will carry out noise inspections each day. Changes and increases in noise levels could be indicative of problems with plant and equipment.</p> <p>The following measures will be taken to minimise the risk of noise and vibration:</p> <ul style="list-style-type: none"><li>▪ All plant machinery will be subject to regular inspection and maintenance;</li><li>▪ Equipment shall be switched off when not in use; and</li><li>▪ Treatment operations shall be arranged in such a way as to minimise noise production as far as possible.</li></ul>

### Acceptable Performance Criteria

A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance

Measure	Target / Requirement
Complaints related to noise and vibration	Zero complaints each year

### Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

### Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Form F007 Site Inspection sheets	Office
Form F003 Preventative Maintenance Programme	Office

## Procedure 008

### CWS Ltd EMS

<b>PROCEDURE TITLE</b>	<b>Preventing dust problems</b>
<b>Version</b>	
<b>Date</b>	November 2019
<b>Owner</b>	

#### Link to Environmental Aspects Assessment

<b>Environmental Aspect Ref:</b>	<b>Aspect Description</b>	<b>Link to Aspect &amp; Impact Assessment</b>
ASP1	Release of particulate matter	Dust and other airborne particulates can cause nuisance and impact environment

#### Overview & Scope

<b>Description</b>
Actions to be undertaken in response to dust problems

#### Legal & Other Requirements

<b>Requirement</b>	<b>Description</b>
Permit condition 3.1	Control of emissions that may give rise to pollution
Permitting guidance	

#### Responsible Persons

<b>Responsibility</b>	<b>Responsible Person</b>	<b>Contact No (if applicable)</b>
Procedure owner		
Implementation of procedure		
<b>Responsibility</b>	<b>Other Responsible Person (e.g. Sub-contractor)</b>	<b>Contact No</b>

## Procedure 008

### Procedure

Steps to be taken if safe to do so
<p>Most waste processing is to be undertaken inside a building so there is little prospect of dust being released to the environment from the permitted activities.</p> <p>To ensure dust generation remains a low risk the following measures will be taken:</p> <ul style="list-style-type: none"><li>• Minimising drop heights of potential dusty wastes when transferring and loading</li><li>• Sweeping of indoor work areas and site yards.</li><li>• Visually checking loads leaving the site for dust generating materials</li><li>• Minimising vehicle speeds in the yard</li></ul> <p>Where airborne material is persistently observed to be a problem the following actions will be considered:</p> <ul style="list-style-type: none"><li>• Use of dust suppression comprising of a hose spray within the yard area; and</li><li>• Sweeping of the site to remove dust or mud.</li></ul>

'Emergency' Operating Conditions (System out of control)
<p>In the event of a major incident focus on the safety of personnel and do not implement any steps if there is a risk to human health</p>

### Acceptable Performance Criteria

A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance

Measure	Target / Requirement
Complaints received in relation to dust	Zero complaints related to dust

### Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

### Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Site Inspection sheets (Form F007)	Office
Preventative Maintenance Programme (Form F003)	Office
Spill Kit training records (Form F004)	Office

## Procedure 009

### CWS Ltd EMS

<b>PROCEDURE TITLE</b>	<b>Dealing with litter</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

#### Link to Environmental Aspects Assessment

<b>Environmental Aspect Ref:</b>	<b>Aspect Description</b>	<b>Link to Aspect &amp; Impact Assessment</b>
ASP3	Litter released from site	Litter can cause nuisance and impact off-site environment

#### Overview & Scope

<b>Description</b>
Actions to be undertaken in response to litter problems

#### Legal & Other Requirements

<b>Requirement</b>	<b>Description</b>
<b>Permit condition 3.1</b>	Control of emissions that may give rise to pollution
<b>Permitting guidance</b>	

#### Responsible Persons

<b>Responsibility</b>	<b>Responsible Person</b>	<b>Contact No (if applicable)</b>
Procedure owner		
Implementation of procedure		
<b>Responsibility</b>	<b>Other Responsible Person (e.g. Sub-contractor)</b>	<b>Contact No</b>

## Procedure 009

### Procedure

Steps to be taken if safe to do so
<p>As all of the waste processing is to be undertaken indoors there is little prospect of litter being directly released to the environment from the permitted activities.</p> <p>To ensure litter generation remains a low risk the following measures will be taken:</p> <ul style="list-style-type: none"><li>- Light waste fractions will be stored correctly and away from drafts and site entry / exit points</li><li>- If litter is found on the site yard or immediate access road the following measures will be implemented where appropriate:</li><li>- Litter collected either for recycling or disposal.</li></ul>

'Emergency' Operating Conditions (System out of control)
<p><b>In the event of a major incident focus on the safety of personnel and do not implement any steps if there is a risk to human health.</b></p>

### Acceptable Performance Criteria

A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance.

Measure	Target / Requirement
Complaints received in relation to litter	Zero complaints related to litter

### Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

### Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Weekly Inspection sheets	
Preventative Maintenance Programme	
Spill Kit training records	

Record / Document Description	Location of Records / Evidence
Inspection sheets (Form F007)	Office
Env Incidents (Form F008)	Office
Spill Kit training records (Form F003)	Office

## Procedure 010

### CWS Ltd EMS

<b>PROCEDURE TITLE</b>	<b>Dealing with mud on roads</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

#### Link to Environmental Aspects Assessment

<b>Environmental Aspect Ref:</b>	<b>Aspect Description</b>	<b>Link to Aspect &amp; Impact Assessment</b>
ASP4	Release of mud from site	Mud on roads can cause nuisance, impact road safety and impact the environment

#### Overview & Scope

<b>Description</b>
Actions to be undertaken in response to problems with mud on roads

#### Legal & Other Requirements

<b>Requirement</b>	<b>Description</b>
<b>Permit condition 3.1</b>	Control of emissions that may give rise to pollution
<b>Permitting guidance</b>	

#### Responsible Persons

<b>Responsibility</b>	<b>Responsible Person</b>	<b>Contact No (if applicable)</b>
Procedure owner		
Implementation of procedure		
<b>Responsibility</b>	<b>Other Responsible Person (e.g. Sub-contractor)</b>	<b>Contact No</b>

## Procedure 010

### Procedure

Steps to be taken if safe to do so
The site is largely laid to concrete. This results in limited opportunity for off-site mud generation. If mud on site roads is a significant problem mechanical sweeping will be undertaken.
'Emergency' Operating Conditions (System out of control)
In the event of a major incident focus on the safety of personnel and do not implement any steps if there is a risk to human health.

### Acceptable Performance Criteria

A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance.

Measure	Target / Requirement
Complaints received in relation to mud on roads	Zero complaints related to mud on road

### Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

### Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Weekly Inspection sheets (Form F007)	Office
Preventative Maintenance Programme (F003)	Office



## Procedure 011

### CWS Ltd EMS

<b>PROCEDURE TITLE</b>	<b>Dealing with pests</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

#### Link to Environmental Aspects Assessment

<b>Environmental Aspect Ref:</b>	<b>Aspect Description</b>	<b>Link to Aspect &amp; Impact Assessment</b>
ASP7	Accepting wastes that encourage pests	Pests can cause on-site and off-site nuisance

#### Overview & Scope

<b>Description</b>
Actions to be undertaken in response to problems with pests

#### Legal & Other Requirements

<b>Requirement</b>	<b>Description</b>
<b>Permit condition 3.1</b>	Control of emissions that may give rise to pollution
<b>Permitting guidance</b>	

#### Responsible Persons

<b>Responsibility</b>	<b>Responsible Person</b>	<b>Contact No (if applicable)</b>
Procedure owner		
Implementation of procedure		
<b>Responsibility</b>	<b>Other Responsible Person (e.g. Sub-contractor)</b>	<b>Contact No</b>

## Procedure 011

### Procedure

Steps to be taken if safe to do so
<p>The nature of the waste and the inspection procedures in place will limit the possibility of animal by-products and food waste that attract pests being received at the site.</p> <p>The following measures will be taken to minimise the risk of pests:</p> <ul style="list-style-type: none"><li>- Waste inspected before tipping to identify potential contaminants;</li><li>- Quarantine non-conforming putrescible wastes and removal off-site within 72 hours;</li><li>- Visual monitoring for pests/vermin performed daily including inspections for evidence of droppings, damage to property/plant or ground disturbance e.g. burrow, nests and excessive infestation present; and</li><li>- Good housekeeping and regular inspection of mess facilities.</li></ul> <p>In the event of a pest infestation being detected the following measures will be implemented:</p> <ul style="list-style-type: none"><li>- Suitable treatment will be implemented either by employees or by suitable contractors, this may involve the application of insecticides or the setting of traps and poisons, or other measures as appropriate;</li><li>- Any waste identified as attracting scavengers shall be isolated and removed from site.</li></ul>
'Emergency' Operating Conditions (System out of control)
<p>In the event of a major incident focus on the safety of personnel and do not implement any steps if there is a risk to human health.</p>

### Acceptable Performance Criteria

A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance.

Measure	Target / Requirement
Complaints received in relation to pests	Zero complaints related to pests

### Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

### Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Form F007 Site Inspection Form	

## Procedure 012

### CWS Ltd EMS

<b>PROCEDURE TITLE</b>	<b>Dealing with odour problems</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

#### Link to Environmental Aspects Assessment

<b>Environmental Aspect Ref:</b>	<b>Aspect Description</b>	<b>Link to Aspect &amp; Impact Assessment</b>
ASP5	Release of odour from site	Odour can cause nuisance

#### Overview & Scope

<b>Description</b>
Actions to be undertaken in response to problems with odour

#### Legal & Other Requirements

<b>Requirement</b>	<b>Description</b>
<b>Permit condition 3.2</b>	Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of Natural Resources Wales.
<b>Permitting guidance</b>	

#### Responsible Persons

<b>Responsibility</b>	<b>Responsible Person</b>	<b>Contact No (if applicable)</b>
Procedure owner		
Implementation of procedure		
<b>Responsibility</b>	<b>Other Responsible Person (e.g. Sub-contractor)</b>	<b>Contact No</b>

## Procedure 012

### Procedure

Steps to be taken if safe to do so
<p>The nature of the waste and the inspection procedures in place will limit the possibility of odorous wastes being received at the site.</p> <p>The following measures will be taken to minimise the risk of odour:</p> <ul style="list-style-type: none"><li>- Waste inspected before tipping to identify potential contaminants;</li><li>- Quarantine odorous wastes in a sealed skip and remove off-site within 72 hours;</li><li>- Sniff monitoring for odour performed daily</li><li>- Good housekeeping and regular inspection of mess facilities.</li></ul> <p>In the event of an odour problem the following measures will be implemented:</p> <ul style="list-style-type: none"><li>- Suitable treatment will be implemented either by employees or by suitable contractors</li><li>- Any waste identified as generating the odour shall be isolated and removed from site.</li></ul>

'Emergency' Operating Conditions (System out of control)
<p>If Natural Resources Wales considers that the activities are giving rise to pollution outside the site due to odour an odour management plan will be developed and implemented.</p>

### Acceptable Performance Criteria

A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance

Measure	Target / Requirement
Complaints received in relation to odour	Zero complaints related to odour

### Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

### Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Site Inspection Form (Form F07)	Office
Preventative Maintenance Programme (Form F003)	Office

## Procedure 013

### CWS Ltd EMS

<b>PROCEDURE TITLE</b>	<b>Investigating near misses and accidents</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

#### Link to Environmental Aspects Assessment

<b>Environmental Aspect Ref:</b>	<b>Aspect Description</b>	<b>Link to Aspect &amp; Impact Assessment</b>
All Aspects	Near misses, accidents and incidents	Near misses, accidents and incidents have potential to cause pollution

#### Overview & Scope

<b>Description</b>
Actions to be undertaken in response to near miss or accident

#### Legal & Other Requirements

<b>Requirement</b>	<b>Description</b>
<b>Permit condition 3.1</b>	Control of emissions that may give rise to pollution
<b>Permitting guidance</b>	

#### Responsible Persons

<b>Responsibility</b>	<b>Responsible Person</b>	<b>Contact No (if applicable)</b>
Procedure owner		
Implementation of procedure		
<b>Responsibility</b>	<b>Other Responsible Person (e.g. Sub-contractor)</b>	<b>Contact No</b>

## Procedure 013

### Procedure

Steps to be taken if safe to do so
Immediately inform the site manager of the occurrence of a near miss or accident.
If necessary, contact Emergency services on 999
If injury requiring medical treatment has occurred, contact appointed First Aider, or where necessary immediately dial 999.
If necessary, refer to other procedures for dealing with emergencies: <ul style="list-style-type: none"><li>➤ Use Procedure P003 for identification of suspicious items</li><li>➤ Use Procedure P004 for dealing with spillages</li><li>➤ Use FPMP for fires</li></ul>
The Site Manager will investigate the near miss / accident and compile a report using Form XX. The aim of the investigation should be to identify the root cause and to prevent the same thing happening again.
Use Form F008 for recording and investigating near misses and accidents.
Undertake a review of the near miss and accident procedure, and update training requirements if necessary.

'Emergency' Operating Conditions (System out of control)
In the event of a major incident focus on the safety of personnel and do not implement any steps if there is a risk to human health.

### Acceptable Performance Criteria

A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance.

Measure	Target / Requirement
<ul style="list-style-type: none"><li>•Check for presence of spill kits</li><li>•Check liquids are provided with correct bunding</li><li>•Check liquid transfer techniques are working correctly</li></ul>	<ul style="list-style-type: none"><li>•Weekly</li></ul>

### Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

## Procedure 013

### Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Form F007 Site Inspection sheets	Office
Form F003 Preventative Maintenance Programme	Office
Form F004 Spill Kit training records	Office
Form F008 for Recording near misses, accidents and incidents	Office

## Procedure 014

### CWS Ltd EMS

<b>PROCEDURE TITLE</b>	<b>Reporting Environmental Incidents</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

#### Link to Environmental Aspects Assessment

<b>Environmental Aspect Ref:</b>	<b>Aspect Description</b>	<b>Link to Aspect &amp; Impact Assessment</b>
All	Documenting environmental incidents	Records of actions taken during an incident need to be maintained for NRW and insurance purposes

#### Overview & Scope

<b>Description</b>
Actions to be followed if there is an actual or potential pollution incident

#### Legal & Other Requirements

<b>Requirement</b>	<b>Description</b>
<b>Permit condition 4.3</b>	Notification of NRW of actual or potential pollution incident
<b>Permitting guidance</b>	

#### Responsible Persons

<b>Responsibility</b>	<b>Responsible Person</b>	<b>Contact No (if applicable)</b>
Procedure owner		
Implementation of procedure		
<b>Responsibility</b>	<b>Other Responsible Person (e.g. Sub-contractor)</b>	<b>Contact No</b>



## Procedure 014

### Procedure

Steps to be taken
<p>All employees are responsible for reporting environmental incidents to the Site Manager. The Permit requires actual or potential pollution incidents to be reported to NRW within 24 hrs.</p> <p>Incident Report template (Form F008) as soon as possible after the verbal report has been made.</p> <p>Incidents could include:</p> <ul style="list-style-type: none"><li>- Actual or imminent risk of significant environmental pollution.</li><li>- Breach of statutory limits or Site Licence Conditions.</li><li>- Any incident that must be reported to the enforcing authorities.</li><li>- Deposit of significant amounts of a non-permitted waste in skips or directly at the site.</li><li>- Any incident that could foreseeably lead to serious public complaint or media enquiries.</li><li>- Major damage to plant, equipment, premises including fires on-site.</li><li>- Severe injury of the public.</li><li>- Serious near-misses which could have foreseeably lead to any of the above.</li></ul> <p>A central file containing all Incident Reports will be maintained and will be reviewed at regular intervals to identify whether any trends or patterns can be discerned.</p> <p>Where an incident is required to be reported to the enforcing authorities, the Site Manager must ensure that this report has been made within the required time period and in the specified format.</p>

### Acceptable Performance Criteria

A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance

Measure	Target / Requirement

### Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

### Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Form F008 Incident Report Form	

## Procedure 015

### CWS Ltd EMS

<b>PROCEDURE TITLE</b>	<b>Managing Complaints</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

#### Link to Environmental Aspects Assessment

<b>Environmental Aspect Ref:</b>	<b>Aspect Description</b>	<b>Link to Aspect &amp; Impact Assessment</b>
All aspects	Site activity could be cause of complaint	Recording complaints enables improvements to be made

#### Overview & Scope

<b>Description</b>
Actions to be followed upon receipt of complaint

#### Legal & Other Requirements

<b>Requirement</b>	<b>Description</b>
<b>Permit condition 1.1.1</b>	Written management system that identifies and minimises risks of pollution, including those drawn to the attention of the operator as a result of complaints.
<b>Permitting guidance</b>	

#### Responsible Persons

<b>Responsibility</b>	<b>Responsible Person</b>	<b>Contact No (if applicable)</b>
Procedure owner		
Implementation of procedure		
<b>Responsibility</b>	<b>Other Responsible Person (e.g. Sub-contractor)</b>	<b>Contact No</b>

## Procedure 015

### Procedure

Actions to be taken
<p>On receipt of a complaint, the recipient shall enter the relevant details onto Complaint Record Form FR2.</p> <p>➤ Use Forms F009 for F010 for recording and logging complaints</p> <p>The Site Manager should be informed immediately and should be responsible for working out the next steps depending upon the nature of the complaint. The proposed next steps should be communicated to the person who has made the complaint.</p> <p>The Site Manager will identify if other personnel need to be involved with investigating the source of the complaint or fixing the identified problem.</p> <p>An immediate visual site inspection and/or sniff test will be Conducted where relevant. The aim will be to identify any issues of concern.</p> <p>Emergency procedures within the Environmental Management System Plan or relevant procedure shall be initiated immediately if a verified event is in progress and that it is determined to be arising as a result of the company's operations.</p> <p>For all complaints, reference will be made to the site activities at the time of the complaint and further onsite investigations conducted to determine whether any abnormal operations are/were occurring.</p> <p>Actions required to prevent the problem re-occurring will be worked out. These will be recorded on a Corrective Action Form</p> <p>➤ Use Form F011 and F012 for recording non-conformances and managing Preventative Actions</p> <p>The person who made the complaint should be provided with an update on the steps To be taken.</p> <p>Within 28 days of the complaint a short factual report should be submitted to Natural Resources Wales by the Site Manager. The report should explain the situation and the actions taken to solve the problem.</p> <p>All complaints should be logged on the Customer Complaint Log form.</p> <p>➤ Use Form F010 for logging complaints</p>

### Acceptable Performance Criteria

A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance

## Procedure 015

Measure	Target / Requirement
Number of complaints	Zero complaints each year

## Training

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

## Records & Associated Documentation

Record / Document Description	Location of Records / Evidence
Form F009 Customer Complaint form	Office
Form F010 Customer Complaint Log	Office

CWS Ltd EMS

<b>PROCEDURE TITLE</b>	<b>Storing and handling gas cylinders</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

Link to Environmental Aspects Assessment

<b>Environmental Aspect Ref:</b>	<b>Aspect Description</b>	<b>Link to Aspect &amp; Impact Assessment</b>
	Management of gas cylinders	Gas cylinders can pose a fire risk and release gases toxic to humans

Overview & Scope

<b>Description</b>
Actions to be undertaken when handling and storing cylinders

Legal & Other Requirements

<b>Requirement</b>	<b>Description</b>
<b>Permit condition 3.1</b>	Control of emissions that may give rise to pollution
<b>Permitting guidance</b>	

Responsible Persons

<b>Responsibility</b>	<b>Responsible Person</b>	<b>Contact No (if applicable)</b>
Procedure owner		
Implementation of procedure		
<b>Responsibility</b>	<b>Other Responsible Person (e.g. Sub-contractor)</b>	<b>Contact No</b>

## Procedure 016

### Procedure

#### Steps to be taken if safe to do so

Gas cylinders (whether full or empty, bought or orphan) must be stored in a secure, well ventilated caged area, sited away from drains and sumps which can hold and accumulate heavier-than-air gases. Any cylinders found in areas where such air could accumulate must be removed immediately and stored in line with this document.

- The storage area must be clearly signed and kept locked when not in use. Empty bottles kept separate from full ones).
- Ensure that no ignition sources are permitted in or around storage areas and that 'NO SMOKING' and 'No NAKED FLAMES' signs are prominently displayed.
- Ensure that there are no combustible or hazardous materials near to the storage area, such as batteries, waste oils and waste paints.
- **ONLY** trained authorised personnel should handle cylinders & enter a storage area.
- Ensure that clear instructions for safe storage and collection are posted on the storage area and that all site staff are aware of and understand them.
- Ensure that an appropriate fire extinguisher is stored nearby, but not kept inside the storage area.
- Ensure no cylinders are cut open or size reduced.

#### Cylinder Storage

The Storage of Gas Cylinders should comply with Section 5.1 of the British Compressed Gas Association advisory document 'BCGA GN2':

1. *Oxidant cylinders **MUST** be stored 3m away from flammable gases or separated by a fire resistant partition (minimum 30 minutes).*
2. *LPG (50-1000kg) to be stored 3m from any other gas cylinder types.*
3. *Toxic cylinders to be stored 3m from LPG & 1m from other flammables.*
4. *Pyrophorics to be stored 2m from most gas types & 3m from LPG.*

All cylinders must be stored in an upright position. Taller cylinders (i.e. those with a high centre of gravity) must be individually secured at all times.

Ensure that the contents of the cylinders are identified and logged so far as possible. Where it is not possible to identify the contents, the cylinder must be labelled as 'Contents Unknown'.

#### Cylinder Handling

Only trained authorised personnel should handle cylinders. Employees must be trained in the appropriate Manual Handling techniques for handling cylinders. Ensure that all persons wear the correct PPE (comprising eye protection & safety footwear) whenever handling or using gas cylinders.

Employees must be instructed and monitored to ensure that they:

- **NEVER** try to open a gas cylinder to discharge the contents.
- **ALWAYS** ensure that the valve is closed before attempting to handle a gas cylinder.
- **NEVER** roll cylinders along the ground. This can damage the cylinder or the valve
- **NEVER** throw or drop the cylinders

The quantities of gas cylinders stored on site should be kept as low as possible within the limits of the safe storage facilities provided.

Any cylinders found in the waste stream must be removed immediately and stored in an appropriate facility for the type of gas in the cylinder, well away from fire exits and operational areas.

Never smoke or use naked flames in or near to cylinders. Obey all safety signs and instructions.

Always follow the correct Manual Handling technique when handling cylinders. If you are unsure, ask your manager.

## Procedure 016

### **Disposal**

The cylinders should be removed for disposal on a regular basis by an approved contractor / supplier.

### **'Emergency' Operating Conditions (System out of control)**

In the event of a major incident focus on the safety of personnel and do not implement any steps if there is a risk to human health.

#### **Emergency Procedures**

Ensure that emergency procedures are in place, and activated in the event of an emergency situation occurring, such as a fire or a substantial gas leak.

Employees must inform the supervisor or manager immediately in the event of an emergency situation, so that they may contact the emergency services.

Inform all other site users, and those people in surrounding buildings to evacuate immediately in the event of an emergency. (and go to the assembly point)

All empty or redundant Fire Extinguishers should be identified and replaced as soon as possible.

### **Acceptable Performance Criteria**

A measure of compliance (legal & other requirements) is to routinely assess against defined criteria using the conditions as described above - this is also a useful tool when conducting audits. To this end, the table below broadly summarises what is required to remain in compliance.

Measure	Target / Requirement
Issues with gas cylinders	Zero problems with gas cylinders

### **Training**

Who	Requirement
All responsible persons	All those listed to be familiar with this procedure

### **Records & Associated Documentation**

Record / Document Description	Location of Records / Evidence
Weekly Inspection sheets (Form F007)	Office

**CAERPHILLY SKIPS  
BESPOKE PERMIT  
VARIATION**

**ENVIRONMENTAL  
MANAGEMENT SYSTEM**

**Appendix 2  
Forms**

*Report Number 1960r2v2d0520*



**Form SF01**

**CWS Ltd EMS**

<b>FORM TITLE</b>	<b>Record Of Waste Deliveries</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

### Link to Procedures:

Procedure Ref:	Procedure description
	This procedure is implemented through SkipTrak software

[illegible]

## Form SF2

### CWS Ltd EMS

<b>FORM TITLE</b>	<b>Recording Non-Compliant Wastes</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

#### Link to Procedures

<b>Procedure Ref:</b>	<b>Procedure description</b>

Date and Time:	Reason for non-compliance e.g. odour, visual contamination, too wet etc.
Waste Description:	Action Taken:
Name and Address of Waste Producer	Waste Carrier Details, Vehicle Type and Vehicle Registration
Waste Transfer Note Number	Final Waste Destination
NRW Contacted?	

## CWS Ltd EMS

<b>FORM TITLE</b>	<b>Preventative Maintenance Programme</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

## Link to Procedures

Procedure Ref:	Procedure description

Preventative maintenance is regularly performed to reduce the likelihood of the item failing or requiring unplanned replacement or maintenance. Preventative maintenance is performed while the equipment is still working, so that it does not break down unexpectedly.

The maintenances schedule below outlines the frequency that key parts of the site and items of plant and equipment are to be checked and maintained. Each item will be provided with a bespoke detailed checklist in accordance with the manufacturer's instructions, where relevant. At all times however consideration should be given to: **level of wear and tear, the need for lubrication, signs of overheating and performance of silencers.**

**IF ANY DEFECTS ARE NOTED THAT POSE A RISK TO HUMAN HEALTH OR THE ENVIRONMENT SENIOR MANAGEMENT SHOULD BE INFORMED IMMEDIATELY**

Item of Plant/ Part of site	Detailed Checklist Reference	Daily	Weekly	Monthly	Quarterly	Six monthly	Annually

**Form SF03**

Item / part of site:		Frequency of checks:
Completed on	Completed by	Comments e.g. work completed, repairs required,

**Form SF04****CWS Ltd EMS**

<b>FORM TITLE</b>	<b>Training Record</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

**Link to Procedures:**

<b>Procedure Ref:</b>	<b>Procedure description</b>
Training	Documenting personnel training

<b>Name</b>	<b>Date employment commenced</b>
	<b>Job Title</b>

**Induction Training**

<b>Course Title</b>	<b>Authorisation by Line manager</b>	<b>Date of Authorisation</b>	<b>Date training Completed</b>	<b>Initialled by trainer</b>

**Qualifications gained in this employment and Expiry Date**

--

**Training requirements**

--



## Form SF6

### CWS Ltd EMS

<b>FORM TITLE</b>	<b>Fire Drills</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

#### Link to Procedures

<b>Procedure Ref:</b>	<b>Procedure description</b>
P003	Documenting fire drills

A drill is intended to ensure, by means of training and rehearsal, that in the event of fire:

The people who may be in danger act in a calm and orderly manner. The appointed personnel undertake their key tasks.

The means of escape are used in accordance with a pre-determined and practised plan. If evacuation becomes necessary, staff should be aware of what to do.

Normal, advance warning should **not** be given of the fire drill.

Every opportunity should be taken to learn lessons from the drill and to reinforce staff training where gaps are identified.

It is good practise to appoint a small number of people to observe the drills and highlight areas of concern. It is important that all managers are aware of the procedures, as employees will look towards them in an emergency.

#### FIRE EVACUATION LOG SHEET

<b>Date:</b>	<b>Reason for Evacuation:</b>
<b>Time of Alarm:</b>	
<b>Time Taken To Evacuate:</b>	
<b>Time Taken To Conduct Roll Call:</b>	
<b>Anyone unaccounted for:</b>	
<b>Were any escape routes blocked?</b>	
<b>If yes, with what?</b>	
<b>Was all machinery switched off?</b>	
<b>If not, why?</b>	
<b>Fire alarm reset?</b>	
<b>Feedback from employees?</b>	

Fire evacuation drills should be carried out at least once in every period of 6 months, unless otherwise specified.

## Form SF7

### CWS Ltd EMS

<b>FORM TITLE</b>	<b>Daily Site Inspection Form</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

#### Link to Procedures

<b>Procedure Ref:</b>	<b>Procedure description</b>
Site Inspection	Documenting Site Inspections

### DAILY SITE INSPECTION FORM

Use this form each day, at any time, to record the performance of the site. Completion of this form on a regular basis will assist with early identification of aspects requiring improvement and potentially prevent incidents occurring. Taking photographs on a regular basis will also help assess site conditions.

**IF ANY ASPECT IS OF THE SITE OPERATION IS FOUND TO BE POSING A RISK TO HUMAN HEALTH OR THE ENVIRONMENT THEN A MANAGEMENT REPRESENTATIVE SHOULD BE INFORMED IMMEDIATELY**

<b>Date:</b>	<b>Inspected By:</b>	<b>Outdoor Weather:</b>
<b>What activities are occurring during the inspection? e.g. processing/not processing, waste being delivered etc.</b>		
<b>Observations and actions required should be recorded below. If there are no issues of concern 'OK' can be used. Before completing this form please review the previous inspection record to check if any actions should have</b>		
<b>Area of Site Inspected</b>	<b>ISSUES OF CONCERN:</b> Important factors to consider during the visual inspection of any part of the site should include: <b>security, vandalism or damage, odours, leaks, presence of nuisance dust and noise, presence of pests such as vermin/birds/insects, litter, fire hazards, integrity of drainage systems, safety of traffic movements and maintenance requirements.</b>	
<b>Site Exterior including roof structure and surface water drainage</b>		
<b>Access and Exit Points</b>		
<b>Waste Receipt Area</b>		
<b>Sealed drainage system and interceptor</b>		
<b>Fire Fighting Equipment</b>		
<b><u>Actions Required or Additional Notes:</u></b>		



## Form SF8

### CWS Ltd EMS

<b>FORM TITLE</b>	<b>Accident and Incident Record</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

#### Link to Procedures

<b>Procedure Ref:</b>	<b>Procedure description</b>

<b>Date and time of the incident</b>	
What happened, what was it about?	
Was anyone else aware of this – other witnesses? If so who?	
What caused it?	
What action did you take to fix the problem? Were external agencies involved?	
What have you done to make sure that it does not happen again?	
Was there any significant pollution – for example: oil entering a surface water drain. If so what?	
If there was then you must notify NRW on 0300 065 3000 ASAP. Have you done so?	Yes/No/not applicable Time: Date: NRW Incident number:
Please print your name and sign	

**Form SF9****CWS Ltd EMS**

<b>FORM TITLE</b>	<b>Recording Complaints</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

**Link to Procedures:**

<b>Procedure Ref:</b>	<b>Procedure description</b>
P015	Dealing with complaints

**Information to be recorded:**

<b>Name and Address:</b>		<b>Tel:</b>	
		<b>Fax:</b>	
		<b>E-Mail:</b>	
		<b>Mobile:</b>	
<b>Date Complaint Received</b>	<b>Written or Verbal</b>	<b>Date Complaint Rectified</b>	<b>Written or Verbal</b>
<b>Nature of Complaint</b>			
<b>Remedial Action</b>			
<b>All Complaints Should Be Discussed At The Next Management Review Meeting</b>			
<b>Review Meeting Date</b>	<b>Complaint Discussed</b>	<b>Action Agreed</b>	<b>Signed (Meeting Rep.)</b>
<b>Comments</b>			

**Form SF10**

**CWS Ltd EMS**

<b>FORM TITLE</b>	<b>Customer Complaint Log</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

### Link to Procedures:

Procedure Ref:	Procedure description
P015	Dealing with complaints

[illegible]

## Form SF11

### CWS Ltd EMS

<b>FORM TITLE</b>	<b>Non-conformance Corrective Action Report</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

#### Link to Procedures

<b>Procedure Ref:</b>	<b>Procedure description</b>
Audits	Recording non-conformances

Non Conformance No:	Raised by:	Position:	Date:
Details :			
<b>Agreed corrective/preventive action</b>			
Completed by		Date	
Management comments			
Signed		Date	
<b>All Non-conformances Should Be Discussed At The Next Management Review Meeting</b>			
Review Meeting Date	Non Conformance discussed	Action Agreed	Signed (Meeting Rep.)
Comments			

**Form SF12**

**CWS Ltd EMS**

<b>FORM TITLE</b>	<b>Preventative Action</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

### Link to Procedures

Procedure Ref:	Procedure description
Audits	Preventing future non-conformances

[illegible]

**Form SF13**

**CWS Ltd EMS**

<b>FORM TITLE</b>	<b>Audit Programme</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

## Link to Procedures

Procedure Ref:	Procedure description
Audits	Scheduling Audits

[illegible]

# Form SF14

## CWS Ltd EMS

<b>FORM TITLE</b>	<b>Audit Report</b>
<b>Version</b>	
<b>Date</b>	<b>November 2019</b>
<b>Owner</b>	

### Link to Procedures:

<b>Procedure Ref:</b>	<b>Procedure description</b>
Audit	Documenting audits of procedures

Procedure Audited: .....				Title.....			
Audit Report No.....		Conducted By.....			Date.....		
<b>Audit Summary :</b> Procedure ..... has been audited and its application reviewed.  The applied procedure <b>IS/IS NOT</b> complied with (see separate non-conformance reports)							
Audit Report :		Y	N	Remarks			
a) Is current revision in use?		...	...	.....			
b) Is it a controlled copy?		...	...	.....			
c) Is it easily accessible?		...	...	.....			
d) Is it correctly applied?		...	...	.....			
e) Does it need changing?		...	...	.....			
Examples of Documents and Records reviewed and comments on use :  ..... ..... ..... .....							
Reviewed By ..... (Management Representative) Date : .....  Comments :  ..... ..... ..... ..... .....							

**CAERPHILLY SKIPS  
BESPOKE PERMIT  
VARIATION**

**ENVIRONMENTAL  
MANAGEMENT SYSTEM**

**Appendix 3**  
**Company Policies**  
*Report Number 1960r2v2d0520*



# Health & Safety

## GENERAL POLICY STATEMENT

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### CAERPHILLY SKIP HIRE (CWS) LIMITED

**Caerphilly Skip Hire (CWS) Limited** recognises that it has responsibilities for the health and safety of its workforce whilst at work and others who could be affected by our work activities. We will assess the hazards and risks faced by our workforce in the course of their work and take action to control those risks to an acceptable, tolerable level.

Our managers and supervisors are made aware of their responsibilities and required to take all reasonable precautions to ensure the safety, health and welfare of our workforce and anyone else likely to be affected by the operation of our business.

This business intends meeting its legal obligations by providing and maintaining a safe and healthy working environment so far as is reasonably practicable. This will be achieved by;

- providing leadership and adequate control of identified health and safety risks;
- consulting with our employees on matters affecting their health and safety;
- providing and maintaining safe plant and equipment;
- ensuring the safe handling and use of substances;
- providing information, instruction, training where necessary for our workforce, taking account of any who do not have English as a first language;
- ensuring that all workers are competent to do their work, and giving them appropriate training;
- preventing accidents and cases of work-related ill health;
- actively managing and supervising health and safety at work;
- having access to competent advice;
- aiming for continuous improvement in our health and safety performance and management through regular (at least annual) review and revision of this policy; and
- the provision of the resource required to make this policy and our health and safety arrangements effective.

We also recognise;

- our duty to co-operate and work with other employers when we work at premises or sites under their control to ensure the continued health and safety of all those at work; and
- our duty to co-operate and work with other employers and their workers, when their workers come onto our premises or sites to do work for us, to ensure the health and safety of everyone at work.

To help achieve our objectives and ensure our employees recognise their duties under health and safety legislation whilst at work, we will also remind them of their duty to take reasonable care for themselves and for others who might be affected by their activities. These duties are explained on first employment at induction and also set out in an Employee Safety Handbook, given to each employee, which sets out their duties and includes our specific health and safety rules.

In support of this policy a responsibility chart and more detailed arrangements have been prepared.

SIGNATURE: Alun Pitten DATE: 01.12.18

POSITION: Director

---

Peninsula Victoria Place, Manchester M4 4FB

0844 892 2773 peninsula-uk.com



**PENINSULA**

Peninsula Business Services Ltd has been certified by BSI to ISO 9001, OHSAS 18001 and ISO 27001 under certificate numbers FS 543954, OHS 559402 and IS 559052 © Peninsula Business Services Ltd 2016

# CAERPHILLY SKIP HIRE (CWS) LIMITED

## Health and Safety Policy and Procedures

Supported by





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## Contents

### General Policy

A declaration of our intent to provide and maintain, so far as is reasonably practicable, a safe and healthy working environment and to enlist the support of our employees in achieving these goals.

### Organisation and Responsibilities

This section sets out the health and safety responsibilities of key personnel within the organisation.

### Safety Arrangements

This section explains the systems and procedures that will be used to form the basis of our health and safety regime.

### Safety Records (this section may be in a separate folder)

This section contains;

- An Annual Review of our Health and Safety System and Procedures.
- Periodic Checklists created specifically for individual roles and responsibilities.
- A comprehensive source of records relating to statutory examination periodic inspection and testing of the work equipment and installations used by our organisation. Records relating to Fire Safety Management will be found in your Safety Management System.
- A system for keeping health and safety training records.
- A section for accident and incident reporting, and investigation.

## Health and Safety Policy

### General Policy

This Health and Safety Policy contains a plan detailing how we manage our health and safety issues. The policy sets out our commitment to manage risks and provide good standards of health and safety and also to meet our legal duties. Health and safety is an integral part of how we do business as a responsible employer and we have put in place the necessary organisation and arrangements to achieve this. This policy has been initiated after carrying out a full appraisal of our health, safety and welfare requirements and will be reviewed periodically (at least annually).

### Health and Safety General Policy Statement

This is a declaration of our intent to provide and maintain, so far as is reasonably practicable, a safe and healthy working environment and to enlist the support of employees towards achieving these goals. The General Policy statement is brought to the attention of all employees by publication in the main policy manual and in the Employee Safety Handbook. It may also be included on notice boards in our premises.

### Organisation

This part of the Policy details the health and safety responsibilities of key personnel within our organisation. These responsibilities are fulfilled by completion of various Safety Records, pro-formas and records in relation to on-going maintenance activities, training, accident reporting, and investigation, and actions that have taken place.

### Relevant legislation

This page sets out details of the main statutes and regulations affecting health and safety at work that are currently in force.

### Safety Arrangements

This part of the Policy explains the systems and procedures in place for managing individual topics or subjects for which our business is responsible.

**To assist us with our duty we have retained Peninsula Business Services Limited to provide information and guidance on how these provisions should be managed and recorded.**

**We accept that we cannot discharge our responsibility for managing health, safety and welfare within the workplace to others outside our employ. Use of the above documents will aid our success in fulfilling these responsibilities.**

## Health and Safety General Policy Statement

Caerphilly Skip Hire (CWS) Limited recognises that it has responsibilities for the health and safety of our workforce whilst at work and others who could be affected by our work activities. We will assess the hazards and risks faced by our workforce in the course of their work and take action to control those risks to an acceptable, tolerable level.

Our managers and supervisors are made aware of their responsibilities and required to take all reasonable precautions to ensure the safety, health and welfare of our workforce and anyone else likely to be affected by the operation of our business.

This business intends meeting its legal obligations by providing and maintaining a safe and healthy working environment so far as is reasonably practicable. This will be achieved by;

- providing leadership and adequate control of identified health and safety risks;
- consulting with our employees on matters affecting their health and safety;
- providing and maintaining safe plant and equipment;
- ensuring the safe handling and use of substances;
- providing information, instruction, training where necessary for our workforce, taking account of any who do not have English as a first language;
- ensuring that all workers are competent to do their work, and giving them appropriate training;
- preventing accidents and cases of work related ill health;
- actively managing and supervising health and safety at work;
- having access to competent advice;
- aiming for continuous improvement in our health and safety performance and management through regular (at least annual) review and revision of this policy; and
- the provision of the resource required to make this policy and our health and safety arrangements effective.

We also recognise;

- our duty to co-operate and work with other employers when we work at premises or sites under their control to ensure the continued health and safety of all those at work; and
- our duty to co-operate and work with other employers and their workers, when their workers come onto our premises or sites to do work for us, to ensure the health and safety of everyone at work.

To help achieve our objectives and ensure our employees recognise their duties under health and safety legislation whilst at work, we will also remind them of their duty to take reasonable care for themselves and for others who might be affected by their activities. These duties are explained on first employment at induction and also set out in an Employee Safety Handbook, given to each employee, which sets out their duties and includes our specific health and safety rules.

Signature ..... Date .....

Position ..... .

## Record of Periodic Review of our Health and Safety Policy

Our Health and Safety General Policy Statement and Safety Arrangements are reviewed periodically. This is a record of these periodic reviews we have undertaken. Our Peninsula Health and Safety Consultant will also review our system and documentation during their routine visits to ensure that they meet current statutory requirements and good practice relevant to our business.

This record should be endorsed by all persons who carry out these periodic reviews (including Peninsula Health and Safety Consultants).

DATE	NAME OF REVIEWER(S)	OUTCOME (State – No change required or explain any required changes)	Where changes are required call the BusinessSafe Advice Service, 0844 892 2785, and record here the date of your call
01.12.18	Alun Pitten	no change	

For Peninsula Consultant use

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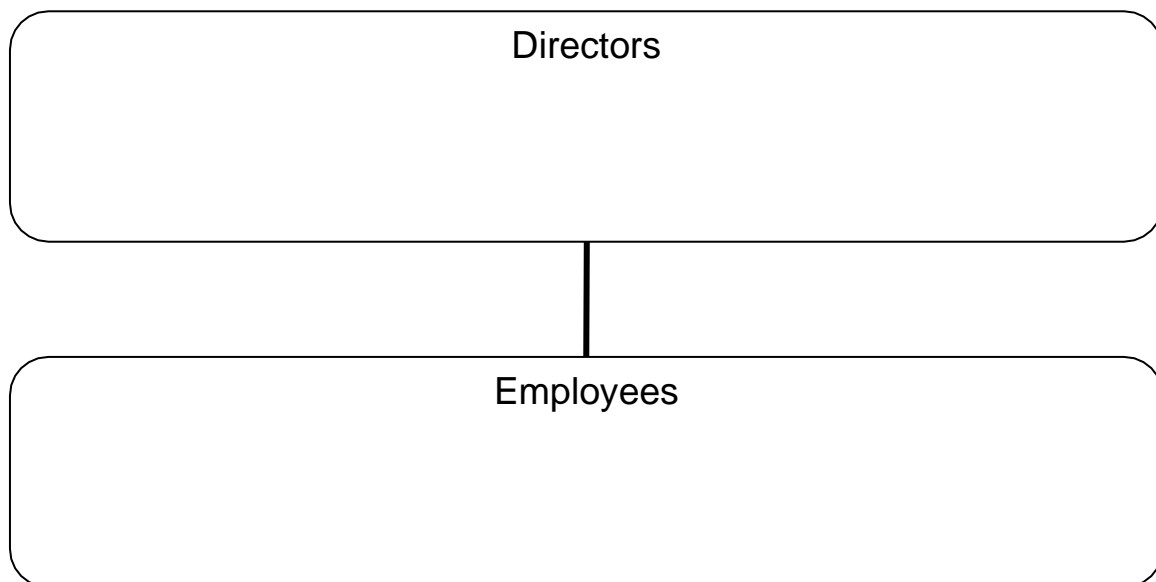


## Organisation

### Health and Safety Management Structure

Although the Directors have overall responsibility for the implementation of this policy day to day responsibility for particular issues has been delegated to key personnel.

The management structure within our business is shown here and the allocation of day to day responsibility for particular health and safety issues is shown in the Responsibility Chart which appears later in this document.



## Health and Safety Management Responsibilities

The Directors have recognised that they retain overall responsibility for health and safety matters. They also recognise that the business needs to take action in respect of the key points listed here. In managing these matters emphasis is placed on recognising hazards and potential risks and then taking steps to minimise their effects on employees and others.

### General

- Provide and resource an effective health and safety management system.
- Make arrangements to consult with employees on health and safety matters.
- Arrange and maintain appropriate Employers' Liability Insurance cover.
- Ensure that health and safety implications are considered when acquiring new equipment and machinery.
- Ensure that contractors (when used) are competent and monitored during work.
- Ensure that a process is in place to identify and report hazards.
- Ensure that all employees receive appropriate health and safety training.
- Provide measures to protect the health and safety of employees working alone.
- Monitor the health and safety performance of the organisation.

### Occupational Health

- Ensure that adequate procedures are in place to identify and address occupational health risks.
- Ensure that the measures required to reduce and control employees' exposure to occupational health risks are in place and used.
- Implement measures to reduce stress within the workplace.

### Accidents, Incidents and First Aid

- Record accidents and incidents.
- Complete accident and incident investigations, identify causes and measures for prevention.
- Ensure that applicable injuries, diseases and dangerous occurrences are reported to the Enforcing Authority.
- Ensure that adequate first aid arrangements are in place.

### Fire and Emergency Arrangements

Ensure that;

- Adequate arrangements are in place to deal with fire safety at our premises or at our member's premises.
- Employees are aware of the fire and evacuation arrangements and other emergency procedures.
- Emergency equipment is provided, tested and maintained appropriately.
- Adequate Fire Risk Assessments are completed.

## **Risk Assessment**

Ensure that;

- Risk assessments are complete and Safe Systems of Work are produced for all activities that pose a significant risk of harm.
- Risk assessments are documented.
- The outcomes of risk assessments are carefully explained to the workforce.

## **Premises**

- Provide a suitable and safe working environment for employees with adequate welfare facilities.
- Ensure that the fixed electrical installation is adequately installed and maintained.
- Introduce and maintain measures to control and manage the risks from asbestos.
- Ensure good housekeeping standards are instigated and maintained.
- Provide suitable and sufficient maintenance of the facilities provided within the workplace.

## **Equipment**

Ensure that;

- All equipment provided by the organisation is suitable and properly used.
- All work equipment is adequately maintained and safe.
- Portable electrical appliances are adequately maintained, inspected and tested.
- Appropriate hand tools are provided and maintained.
- Any Personal Protective Equipment (PPE) provided gives suitable protection, is used and that employees are given information, instruction and training on its use.

## **Substances**

Ensure that;

- All substances are used safely.
- All substances are appropriately stored.

The Responsibility Table on the next page identifies the specific health and safety responsibilities and identifies the individuals they are allocated to. Employees with allocated responsibilities should refer to the associated Safety Arrangements set out later in this policy document.

## **Monitoring**

The operation of this policy and arrangements is actively monitored through the periodic review of our completed Safety Record Forms and also by using Periodic Workplace Checklists. The Directors have overall responsibility for this, but some of the routine tasks may be delegated. We also use an Annual Health and Safety Review form to determine whether our existing health and safety procedures and arrangements are adequate.

People who have delegated responsibilities under this policy will also complete Periodic Checklists of compliance with the policy and procedures arranging for remedial actions to be taken where necessary. The outcomes of these periodic reviews will also be taken into account during the annual review.

Monitoring and review help us to check the effectiveness of our Safety Management System.

## Responsibility Table

*This Responsibility Table shows the allocation of responsibility for particular health and safety issues to named people or management positions.*

### Key

D - Directors

<b>Safety arrangements</b>	D
Managing Safety & Health at Work	✓
Accident, Incident, Ill Health Reporting and Investigation	✓
Workplace H&S Consultation - One-to-one	✓
Risk Assessment and Hazard Reporting	✓
Occupational Health and Health Surveillance	✓
Substance & Alcohol Abuse	✓
Purchasing	✓
Lone Working	✓
Health & Safety Training	✓
Health & Safety of Visitors	✓
Personal Protective Equipment	✓
Safe Systems of Work	✓
Action on Enforcing Authority Reports	✓
Equality and Disability Discrimination Compliance	✓
H&S Information for Employees	✓
Fire Safety - Arrangements and Procedures	✓
First Aid	✓
Welfare, Staff Amenities, Rest Rooms & the Working Environment	✓
Housekeeping and Cleaning	✓
Building Services	✓
The Control of Hazardous & Non Hazardous Waste	✓
Access, Egress, Stairs & Floors	✓
Workplace Signs	✓
Premises	✓
Electrical Safety	✓
The Provision, Use & Maintenance of Work Equipment	✓
Hand Tools	✓
Office Equipment	✓
Storage of Chemical Substances & Agents	✓
Control of Flammable Liquids	✓
Dangerous Substances & Explosive Atmospheres	✓

<b>Safety arrangements</b>	<b>D</b>
Slips, Trips & Falls	✓
The Provision & Use of Machinery	✓
The Safe Use of Machinery	✓
Abrasive Wheels	✓
Compressed Air Equipment	✓
Lifting Equipment & Lifting Operations	✓
Work at Height	✓
Access Equipment	✓
Isolation & Lock-Off Procedures	✓
Welding & Flame Cutting	✓
Workplace Transport & Pedestrian Control	✓
Fork Lift Trucks	✓
Occupational Road Safety	✓
Hand Arm Vibration	✓
Work Related Upper Limb Disorders WRULD	✓
Manual Handling	✓
Display Screen Equipment & DSE User Eye Tests & Spectacles	✓
Use of Chemical Agents & Substances	✓
Asbestos at Work-No Survey & Off Site Risk	✓
Control of Noise at Work	✓
Stress in the Workplace	✓
Dermatitis	✓
Contractor Control & Management	✓
CDM - Client	✓

**Note:**

People with delegated responsibilities for health and safety issues should ensure that the required risk assessments and safety records are completed, either by them or by others and that the required control measures are implemented when work activities take place.

Where more than one person has been assigned responsibility to a particular subject, each should ensure that they have fulfilled their responsibilities in the areas under their control and completed the relevant records. Together they need to check that

collectively the organisation has covered all aspects of safety management for the subject.

## Relevant Legislation

In most cases Health and Safety legislation requires common sense, reasonably practicable precautions to avoid the risk of injury or ill-health at work. Our Health and Safety Management System does not quote specific legal references; giving instead the information and detail of what is required in practice to secure compliance. If the guidance and requirements of our Health and Safety Management System are adopted compliance with the legal requirements will be achieved.

This page sets out, for the record, details of the main statutes and regulations affecting health and safety at work that were in force when this policy was prepared. The BusinessSafe Online Reference Library contains a similar list which will always be up to date. The document is titled 'Health and Safety Legislation (UK)'.

Not every piece of the legislation will apply to our operation on a day to day basis, but we need to be aware of them should circumstances change.

Further detail and access to the specific wording of each of these legal requirements is available from the BusinessSafe 24 Hour Advice Service on 0844 892 2785.

- Building Regulations 2010 (as amended)
- European Regulation (EC) No 2016/425/2016 on Personal Protective Equipment
- European Regulation (EC) No 2008/1272 on classification, labelling and packaging of substances and mixtures
- European Regulation (EC) No 2003/2003 concerning the export and import of dangerous chemicals, as amended
- Classification, Labelling and Packaging of Chemicals (Amendments to Secondary Legislation) Regulations 2015
- Confined Spaces Regulations 1997
- Construction (Design and Management) Regulations 2015
- Control of Artificial Optical Radiation at Work Regulations 2010
- Control of Asbestos Regulations 2012
- Control of Electromagnetic Fields at Work Regulations 2016
- Control of Lead at Work Regulations 2002
- Control of Major Accident Hazard Regulations 2015
- Control of Noise at Work Regulations 2005
- Control of Substances Hazardous to Health Regulations 2002 (as amended)
- Control of Vibration at Work Regulations 2005
- Corporate Manslaughter and Homicide Act 2007
- Dangerous Substances and Explosive Atmospheres Regulations 2002
- Electricity at Work Regulations 1989
- Employers Liability (Compulsory Insurance) Regulations 1998 (as amended)
- Employment of Women, Young Persons and Children Act 1920.
- Equality Act 2010
- Furniture and Furnishings (Fire) (Safety) Regulations 1988 (as amended)



- Gas Appliances (Safety) Regulations 1995 (as amended)
- Gas Safety (Installation and Use) Regulations 1998
- Gas Safety (Management) Regulations 1996
- Hazardous Waste Regulations 2005 (as amended)
- Health and Safety Offences Act 2008
- Health and Safety at Work etc. Act 1974
- Health and Safety (Consultation with Employees) Regulations 1996
- Health and Safety (Display Screen Equipment) Regulations 1992
- Health and Safety (First Aid) Regulations 1981 (as amended)
- Health and Safety Information for Employees Regulations 1989 (as amended)
- Health and Safety (Safety Signs and Signals) Regulations 1996 (as amended)
- Health and Safety (Sharp Instruments in Healthcare) Regulations 2013.
- Health and Safety (Training for Employment) Regulations 1990
- Health and Safety at Work etc. Act 1974 (General Duties of Self-Employed Persons) (Prescribed Undertakings) Regulations 2015
- Ionising Radiations Regulations 1999
- Lifting Operations and Lifting Equipment Regulations 1998
- Lifts Regulations 2016
- Management of Health and Safety at Work Regulations 1999 (as amended)
- Manual Handling Operations Regulations 1992 (as amended)
- Notification of Cooling Towers and Evaporative Condensers Regulations 1992
- Personal Protective Equipment at Work Regulations 2002
- Pressure Systems Safety Regulations 2000
- Provision and Use of Work Equipment Regulations 1998
- Radiation (Emergency Preparedness and Public Information) Regulations 2001
- The Registration, Evaluation, Authorisation and Restriction of Chemicals Regulations 2007 (REACH)
- Regulatory Reform Fire Safety Order 2005
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- Safety Representatives and Safety Committees Regulations 1977
- Work at Height Regulations 2005 (as amended)
- Workplace (Health, Safety and Welfare) Regulations 1992
- Working Time Regulations 1998 (as amended)

## Safety Arrangements Table

Ref. Number	Title	Publication Date
SA1-1	Managing Safety & Health at Work	v1
SA1-3	Accident, Incident, Ill Health Reporting and Investigation	v2
SA1-5	Workplace H&S Consultation - One-to-one	v1
SA1-6	Risk Assessment and Hazard Reporting	v2
SA1-7	Occupational Health and Health Surveillance	v2
SA1-8	Substance & Alcohol Abuse	v1
SA1-9	Purchasing	v1
SA1-13	Lone Working	v3
SA1-14	Health & Safety Training	v1
SA1-15	Health & Safety of Visitors	v1
SA1-17	Personal Protective Equipment	v1
SA1-20	Safe Systems of Work	v1
SA1-21	Action on Enforcing Authority Reports	v1
SA1-22	Equality and Disability Discrimination Compliance	v2
SA1-23	H&S Information for Employees	v1
SA 2-1	Fire Safety - Arrangements and Procedures	v2
SA3-1	First Aid	v2
SA3-2	Welfare, Staff Amenities, Rest Rooms & the Working Environment	v2
SA3-3	Housekeeping and Cleaning	v2
SA3-5	Building Services	v3
SA3-6	The Control of Hazardous & Non Hazardous Waste	v2
SA3-9	Access, Egress, Stairs & Floors	v2
SA3-11	Workplace Signs	v1
SA3-15	Premises	v2
SA4-1	Electrical Safety	v1
SA4-2	The Provision, Use & Maintenance of Work Equipment	v1
SA4-3	Hand Tools	v1
SA4-4	Office Equipment	v1
SA4-5	Storage of Chemical Substances & Agents	v1
SA4-6	Control of Flammable Liquids	v1
SA4-7	Dangerous Substances & Explosive Atmospheres	v1
SA4-8	Slips, Trips & Falls	v1
SA4-10	The Provision & Use of Machinery	v1
SA4-11	The Safe Use of Machinery	v1
SA4-13	Abrasive Wheels	v1
SA4-15	Compressed Air Equipment	v1
SA4-17	Lifting Equipment & Lifting Operations	v1
SA4-20	Work at Height	v2
SA4-21	Access Equipment	v2
SA4-26	Isolation & Lock-Off Procedures	v1
SA4-27	Welding & Flame Cutting	v1
SA4-28	Workplace Transport & Pedestrian Control	v3
SA4-29	Fork Lift Trucks	v1
SA4-31	Occupational Road Safety	v2
SA5-1	Hand Arm Vibration	v1
SA5-6	Work Related Upper Limb Disorders WRULD	v1
SA5-9	Manual Handling	v3
SA5-11	Display Screen Equipment & DSE User Eye Tests & Spectacles	v2
SA5-14	Use of Chemical Agents & Substances	v2
SA5-16G	Asbestos at Work-No Survey & Off Site Risk	v1
SA5-17	Control of Noise at Work	v1
SA5-18	Stress in the Workplace	v1
SA7-2	Contractor Control & Management	v1
SA7-4a	CDM - Client	v2

**CAERPHILLY SKIPS  
BESPOKE PERMIT  
VARIATION**

**ENVIRONMENTAL  
MANAGEMENT SYSTEM**

**Appendix 4  
Factory Production  
Control**

*Report Number 1960r2v2d0520*

PRODUCT ENQUIRY FORM	
ENQUIRY FROM	
DATE	
CONTACT DETAILS OF SITE ADDRESS WHERE PRODUCT IS REQUIRED	
PRODUCT REQUIREMENTS	
PRODUCT SPECIFICATION	
TONNAGE REQUIRED OF PRODUCT	
ADDITIONAL SPECIFIC REQUIREMENTS FOR PRODUCT	
DELIVERY or COLLECTION DETAILS	
OTHER DETAILS/ COMMENTS	

# DAILY PROCESS CONTROL RECORD FORM

[illegible]

## SAMPLING REPORT FORM

<b>Sampling Sheet No</b>								
<b>Production Week Ending:</b>		<b>Day 1</b>	<b>Day 2</b>	<b>Day 3</b>	<b>Day 4</b>	<b>Day 5</b>	<b>Day 6</b>	<b>Day 7</b>
<b>Date:</b>								
<b>Product</b>								
<b>Type</b>								
<b>Upper Aggregate Size</b>								
<b>Purpose for aggregate:</b>								
<b>Location of Sampling Points: Stockpile Middle / Base</b>								
<b>Batch Name:</b>								
<b>Batch Size (tonnage):</b>								
<b>Comments:</b>								
<b>Sampling Method Description</b>								
<b>Date</b>								
<b>Sampling Plan Used</b>								
<b>Weather During Sampling:</b>								
<b>Sampling Procedure:</b>								
<b>Sampling apparatus:</b>								
<b>Mass of sampling increments in Kg:</b>								
<b>Number of sampling increments</b>								
<b>Sampler- print name and signature:</b>								
<b>Sampling Dispatch</b>								
<b>Samples combined to form representative batch sample of weeks production</b>		<b>Unique Sample Reference No.</b>		<b>Contact Test Laboratory (Date) for collection</b>		<b>Bulk samples collected by laboratory (date)</b>		

## WEEKLY SITE INSPECTION FORM

<b>Week ending:</b>							
<b>Inspected By:</b>							
<b>Site Road Condition</b>							
<b>Waste Volumes</b>							
<b>Waste Stockpile Stability</b>							
<b>Product Stockpile Stability</b>							
<b>Dust</b>							
<b>Odour</b>							
<b>Noise</b>							
<b>Litter</b>							
<b>Site Security</b>							
<b>Vandalism</b>							
<b>Weather</b>							
<b>Other</b>							
<b><u>Actions</u></b>							

## PRODUCT NON-CONFORMANCE FORM

[illegible]





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