



ENVIROPARKS (WALES) LIMITED

MATERIALS RECOVERY FACILITY, HIRWAUN

Management and Operations Plan

October 2015

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1. INTRODUCTION

- 1.1 The Enviroparks (Wales) Limited site is located at Ninth Avenue, Hirwaun Industrial Estate, Hirwaun. It lies in an industrial area with industrial buildings to the south and east and open land to the west. The Penderyn Reservoir lies to the north of the site. This will not be impacted by emissions to water from the site as it lies at a higher level and is therefore upstream of the installation.
- 1.2 The site will be operated by Enviroparks (Wales) Limited who will be the legal operator and permit holder, controlling the day to day operation of the site. The installation is used to treat mainly commercial and industrial wastes, with some mixed municipal wastes also being acceptable, in order to recover ferrous metal, fines, and inert aggregate, for recycling, and to produce a solid recovered fuel for sale. Solid recovered fuel is baled and transferred off-site to an energy from waste facility for thermal recovery.
- 1.3 This report provides details of the way in which the site will be managed and operated in order to ensure a high degree of protection to the Environment as a whole.

2. ENVIRONMENTAL MANAGEMENT

- 2.1 The management of Enviroparks (Wales) Limited are committed to the care of the environment and the prevention of pollution. Their commitment to operating in a manner that protects the environment is equally important to them as their commitment to the health and safety and welfare of their employees, and the quality of the services provided to customers.
- 2.2 The Company will operate a materials recycling facility and solid recovered fuel production facility which is a listed activity under the Environmental Permitting (England and Wales) (Amendment) Regulations 2013. The site will receive and process up to 240,000 tonnes of waste each year and the Company will observe the requirements laid down by the Natural Resources Wales in the Environmental Permit. The Company will ensure that all activities are carried out in conformance with the Permit conditions, applying the best available techniques to site infrastructure and operations.

- 2.3 The Company is also committed to complying with other relevant environmental legislation, for example the Duty of Care under section 34 of the Environmental Protection Act, and the Waste (England and Wales) Regulations 2011. They will work closely with all appropriate external authorities to meet all regulatory and legislative requirements.
- 2.4 The Company is committed to improving its environmental performance, and maintains an Integrated Management Plan (IMP), which incorporates a complete environmental management system to ensure the effective management, control, and maintenance of its activities and the minimisation of any potential negative impact on the environment. The environmental management system enables the identification of Company obligations and risks to the environment from the Company activities, sets objectives and targets to minimise negative environmental impacts and to maximise positive ones, and provides the framework of procedures which detail the measures taken to minimise environmental risks.
- 2.5 The Managing Director holds ultimate responsibility for the implementation of the IMP and the management systems within it, and will ensure that adequate resources are made available for the effective implementation of the Plan. This will include the requirement for sufficient staffing to maintain the systems, and to communicate the requirements to all Company staff. Documented procedures will be produced, communicated, reviewed and updated as necessary. The Manufacturing Manager is responsible for delivery of the IMP.
- 2.6 The Company Environmental Policy and the obligations and responsibilities required by the Environmental Permit will be communicated to all colleagues.
- 2.7 Enviroparks (Wales) Limited will constantly strive to improve the environmental performance of its operations at the Hirwaun Site. The IMP, including the environmental management system will be audited and improvement targets will be set on an annual basis, or more frequently as required, to consider potential improvements to Company operations and to the IMP itself. The IMP also includes procedures for the investigation and correction of accidents, incidents, and non-conformances where these may be identified across the Company operations and within the system in order to initiate efficient and effective corrective actions.

3. OPERATIONAL ACTIVITIES

- 3.1 The site sorts mixed commercial, industrial and potentially municipal wastes, allowing viable recyclate to be recovered before preparing the residual element into a solid recovered fuel for use at an energy from waste facility thereby recovering the energy stored within it. Household wastes may also be treated and discrete loads of segregated or mixed recyclables may also be accepted at the site. Single stream recyclates will be placed directly into the bays for outgoing recyclable materials, rather than undergoing shredding and sorting. Activities therefore include the storage of incoming wastes and outgoing recyclates and solid recovered fuels, the sorting of recyclates and the pre-treatment of non-hazardous waste for incineration or co-incineration, and the storage of materials unsuitable for recovery pending disposal.
- 3.2 Waste delivery and dispatch is restricted to 08:00 to 18:00 Monday to Friday and 08:00 to 13:00 on Saturday. In accordance with the planning conditions on the site, there are no waste movements on Sundays or bank holidays. Waste will not be accepted if for any reason there is insufficient storage capacity available or if the site is inadequately staffed. This is to ensure that all waste is managed effectively to prevent pollution, and under these circumstances wastes will be diverted to another, suitably authorised site as a contingency measure.
- 3.3 Operational procedures will be developed for all site activities that may impact on the environment to ensure that they are planned, controlled, operated and monitored in order to satisfy:
- Conditions of the Environmental Permit;
 - Conditions of the planning permission;
 - Any applicable discharge or trade effluent consents/abstraction licences;
 - Enviroparks (Wales) Limited internal operating policies and procedures;
 - Other relevant legislation.
- 3.4 Documented procedures will include, although will not necessarily be limited to:
- Specific operational procedures such as waste pre-acceptance, waste acceptance and rejection procedures and controls on waste treatment and storage;
 - The specification and approval of the appropriate processes, plant and equipment, and their on-going maintenance;
 - Actions to be taken in the event of an accident, incident, emergency or complaint;

- Monitoring of site operations to ensure that all Permit and Company requirements are satisfied;
- The recording, investigation, correction and amendment of any non-conformance identified.

3.5 These procedures are applicable to all operations at the site, and will ensure that only wastes that are in accordance with the Environmental Permit are accepted into the operation, and are stored, handled, treated and dispatched in a suitable manner, and in accordance with the waste hierarchy:



3.6 As a waste recycling and recovery facility, the avoidance of waste for disposal is an integral part of the site operations. Internal waste production from site operations is minimised where possible, for example procedural documents and site records are preferably retained electronically. Where the production of waste cannot be avoided, it is re-used, recycled or sent for recovery, in preference to disposal.

3.7 The activities on site will be operated in the first instance in accordance with the details and procedures set out in the documents which accompanied the original permit application, submitted to Natural Resources Wales. That is:

- “Accidents and Their Consequences”, dated January 2014;
- “Fugitive Emissions Management Plan”, dated January 2014;
- “Environmental Risk Assessment”, dated January 2014;
- “Raw Materials and Water Use and Waste Minimisation”, dated January 2014;
- “Energy”, dated December 2013;

- “Operating Techniques”, as amended in October 2015 and incorporated into this document.

3.8 Such assessments, plans, and procedures will ensure that the site is designed, operated and maintained in accordance with best available techniques and that in the event of any incident or accident which does or may significantly affect the environment, or which may result in a breach of the permit conditions, Enviroparks (Wales) Limited will take any necessary measures to limit the impact, restore compliance, and prevent any recurrence. Natural Resources Wales will be informed of any such incident occurring as per the requirements of the permit.

3.9 As incorporated into or amended by the environmental management system, these and any additional procedures will be updated and agreed with Natural Resources Wales in advance of their implementation at the main operational facility. Copies of procedures will be retained on site and will be available for consideration and review by Natural Resources Wales at any time.

4. SITE IDENTIFICATION AND SECURITY

4.1 The following infrastructure is in place to provide site information, emergency contact details, and security:

1) A site notice board is erected at the site entrance which clearly shows:

- The name of the facility;
- The name, address and telephone number of the Permit Holder;
- The environmental permit reference number;
- The hours of operation;
- The address and telephone number of the Natural Resources Wales office responsible for monitoring the site;
- An emergency, out-of-hours telephone number for the Operator.

2) Secure perimeter fencing.

- 4.2 During operational hours the main gates are open and the site is manned with sufficient staff for the operations. Outside of operational hours the gates are shut and locked, and the site employs a security guard and recorded CCTV surveillance.
- 4.3 The site perimeter fence is checked during each operational day. Defects and any damage to the fence are made secure by the end of the working day and will be repaired within seven working days. All daily inspections are recorded as Area Condition Audits, and any defects are dealt with through the Non-Conformance Procedure.

5. WASTE HANDLING AND TREATMENT

- 5.1 The waste reception hall is located within the materials recycling building and has been designed to ensure ease of access and to allow the most efficient delivery of waste to the site. Sufficient space is available to store two day's waste inputs. Because waste is only accepted between the hours of 08:00 and 18:00 Monday to Friday and on Saturday mornings, the reception hall will be completely cleared before the end of each day's operations. The reception hall will be inspected, and if necessary cleaned, prior to the start of the next day's deliveries. It is the intention that waste is not stored in the reception hall for more than 24 hours but that waste received each day will be processed by the end of the night shift wherever possible. However sufficient capacity exists within the reception hall for two days waste storage (approximately 1,100 tonnes) should this be required as a contingency.
- 5.2 Waste delivery vehicles reverse into the building via fast acting roller shutter doors. In total there are 4 access doors, allowing more than one delivery vehicle to enter the waste reception hall simultaneously. The fast acting roller shutter doors are automatically controlled, closing behind delivery vehicles wherever possible, whilst they discharge their loads.
- 5.3 On entering the waste reception hall, vehicles discharge their payload onto a flat impermeable reception slab surrounded by concrete push walls to a height of 5m. A wheeled front end loader(s) and 360° grab(s) are employed to manage the incoming waste and deliver it to the shredders.

- 5.4 The building has distinct clearly defined areas to ensure that incoming waste, recyclate and solid recovered fuel are stored separately and cannot become cross contaminated.
- 5.5 A safe and secure quarantine area will be used for the storage of any inadvertently received non-permitted or unsuitable waste, pending its collection and removal from the site to a suitably authorised facility. This will be within a designated area inside the waste reception hall.
- 5.6 The processing line has a design capacity of more than 40 tonnes per hour. Waste undergoes an initial coarse shred to ensure that all materials are reduced to less than 400mm across. Fines are removed using screens, and a magnet removes the ferrous metals. Heavy fractions are removed using an air classifier before the remaining material is baled as solid recovered fuel.
- 5.7 Segregated wastes are directed immediately into appropriate bunkers or containers ready for collection from site. The quantity of material in the bunkers and containers is monitored and they are emptied and exchanged as necessary to ensure adequate storage space for the incoming materials.
- 5.8 The residual waste will continue through the process to the solid recovered fuel balers. These form the shredded waste into shrink wrapped bales ready for onward transport to the energy from waste facility.
- 5.9 Solid recovered fuel bales will have a density of 700 – 900 kg/m³. Each bale is wrapped in multiple layers of plastic to provide a good seal, preventing odour and other emissions. Ties or a mesh may be incorporated beneath the plastic wrap to further improve handling.

5.10 Should municipal waste be accepted at the site the screening process will remove the majority of the organics from the waste. This fine material will be stored in a skip within a bunker pending removal for recovery or disposal at a local authorised site. Removal of the organic fraction will prevent putrescible wastes entering the solid recovered fuel bales and therefore help to minimise odours and leachate formation during later storage and transport to the energy from waste facility.

5.11 Waste is collected promptly following processing, generally within 24 hours. Maximum storage times of treated wastes will be as shown below:

Type of Product	Maximum Storage Time
Solid Recovered Fuel	2 days
Metals and inert materials	1 week
Fine organics	2 days

5.12 Segregated recyclates are stored at the far end of the building from the reception hall. Loose recyclates are loaded into dedicated containers or collection vehicles within the main building, prior to dispatch, while the solid recovered fuel bales are loaded by forklift truck onto curtain sided vehicles which are parked outside the main building.

5.13 The solid recovered fuel bales are completely wrapped and hence will not release an odour during storage, and the fork-lift access has fast action doors to ensure that any odour is retained within the building. All materials are removed to specialist recyclers or to the energy from waste facility within the acceptable hours of transportation from the site, and thus some segregated and baled materials may be retained on site until the next delivery and dispatch period.

- 5.14 As the hours for waste delivery and dispatch are limited by the planning permissions whilst waste treatment continues for up to 20 hours a day, trailers loaded with solid recovered fuel may be parked on site overnight, pending dispatch the following morning, or on a Monday following Saturday morning operations.
- 5.15 All vehicles exit via the weighbridge and records are kept regarding the waste type, waste quantity and the receiving site. Paper records are retained in the weighbridge office before being transferred to the site office at least once per week.
- 5.16 Waste materials dispatched off site are removed to authorised facilities only, and are transferred in accordance with the Duty of Care. A registered waste carrier is used. Copies of relevant waste transfer notes/season tickets are maintained in the site office.

6. INFRASTRUCTURE

- 6.1 The surfacing of all waste storage and processing areas is constructed of impermeable reinforced concrete. The design is of sufficient strength to withstand the expected vehicle movements and construction is subject to quality assurance to ensure that the as built floor slab is in accordance with the design.
- 6.2 Waste receipt and processing takes place inside the building, thus keeping the waste dry and minimising the possibility of leachate formation. Internal waste storage and processing areas are designed to drain to a sealed drainage system which directs any water to the foul sewer.
- 6.3 A power wash facility for cleaning mobile plant is located outside, along the western edge of the waste treatment building. The wash system uses fresh water only, and does not include detergents. Wash water passes through an interceptor before entering the foul sewer.
- 6.4 The site fuel tank is provided with a suitable bund, compliant with CIRIA 736 "Containment systems for the prevention of pollution. Secondary, tertiary and other measures for industrial and commercial premises" 2014.

6.5 The bund is kept clear of rain water or any other obstruction so that its capacity is maintained at all times. The level of fuel within the tank is checked before each delivery to prevent overfilling of the tank.

6.6 All site infrastructure is subject to regular inspection and is maintained as required to ensure the integrity of all containment systems.

7. EMISSIONS

Point Source Emissions to Air

7.1 Point source emissions to air from the installation consist of high level vents/fans in the roof of the building. These vents allow exchange of air in order to dissipate vehicle exhaust emissions and maintain a safe working environment within the building.

Point Source Emissions to Water

7.2 The only point source emission to surface water is clean water from the roof and clean external areas and parking areas. The waste storage areas within the main building and the vehicle wash area are designed to drain to foul sewer and are discharged in compliance with an appropriate trade effluent consent.

7.3 Clean water is directed via an interceptor to a SUDs, comprising a series of swales lying along the southern boundary of the site. These attenuate flow to the adjacent stream which is a tributary of the River Gwrangon.

7.4 The design of the SUDs is as agreed with Rhondda Cynon Taff Planning Authority in accordance with the planning conditions for the site.

Point Source Emissions to Sewer

7.5 Point source emissions to sewer comprise foul water from the sites welfare facilities, along with any wash down water. Waste is largely dry and is stored inside the building, however should any contaminated water arise from waste storage this will also be directed to the foul sewer.

- 7.6 The waste processing and storage areas are periodically washed down to ensure that they are kept in a tidy condition and the potential for odour or pests is minimised. A vehicle washing facility is located external to the building to allow cleaning of vehicles as and when necessary. Any water arising from washing down is directed to the foul sewer and thus directed to the local sewage treatment works for treatment prior to discharge. Emissions are in accordance with a trade effluent consent issued by Dwr Cymru.

Fugitive Emissions - Dust, Odour, and Noise

- 7.7 The use and maintenance of suitable site infrastructure, and the implementation of a Fugitive Emissions Management Plan ensures that fugitive emissions from site operations are controlled. Regular Area Condition Audits are undertaken to assess the potential for dust, odour and noise around the site, and are undertaken by the Weighbridge Operator or a competent delegate.

Litter

- 7.8 There should be no litter generated from the site operations due to the control measures in place. Waste is received in enclosed or covered vehicles and is unloaded inside the building. As far as practical, the doors to the building are kept closed, other than when vehicles are entering or exiting the site.
- 7.9 Solid recovered fuel is baled and shrink wrapped, facilitating the handling of these materials and helping to prevent any windblown litter. Loose recovered materials are loaded inside the building and are sent off site in covered or enclosed vehicles.
- 7.10 Regular Area Condition Audits are undertaken to identify the presence of any litter around the site, and also the status of site security infrastructure, that is fencing and site gates. Any litter noted around the site is collected and placed into an appropriate container. Area Condition Audits are undertaken by the Weighbridge Operator or a competent delegate.

Pests and Vermin

- 7.11 To discourage pests and vermin waste is managed on a first in first out basis. Waste is not stored in the reception hall for more than 24 hours other than in exceptional circumstances. The reception hall is managed to ensure that it is fully cleared and all housekeeping (plant or area clean down) is completed before the new day's shift receives more incoming waste. This will prevent any build-up of litter that might provide breeding areas for pests or vermin.
- 7.12 Waste is managed inside the building, restricting access by scavenging animals.
- 7.13 Solid recovered fuel is stored in wrapped bales on curtain sided trailers, preventing access to the material.
- 7.14 The site employs an Area Condition Audit system, which ensures that all areas are inspected daily. Should there be any signs of infestation a record is made on the Area Condition Audit, subsequently retained within the Area File, and corrective action is initiated. In this case a specialist pest control contractor will be asked to attend the site as soon as practical in order to take appropriate action.
- 7.15 The specialist pest control contractor is also retained to make routine inspections of the site and to set rat traps/fly traps as required to minimise any nuisance arising from the presence of these pests.
- 7.16 The Quality, Safety and Environmental Manager is responsible for auditing the Area Condition Audits.

8. MONITORING

- 8.1 It is not proposed that any routine end of pipe monitoring should be carried out. Point source emissions comprise high level ventilation vents from the building, clean water is discharged via the SUDs and wash water is discharged to foul sewer. Each of these discharges is considered low risk. The discharge to sewer will be monitored in accordance with the requirements of Dwr Cymru.
- 8.2 Regular Area Condition Audits are undertaken around the site boundary, during which visual and olfactory monitoring is carried out to ensure that there are no emissions of dust, odour or litter.
- 8.3 The results of the inspection are recorded on the Area Condition Audits and are retained within the Area Files. Any necessary remedial action is identified and implemented. Records show when the remedial action has been completed. These records can be made available to authorised officers of Natural Resources Wales.
- 8.4 A written Complaints Procedure is in place and all complaints will be fully investigated and resolved.
- 8.5 The condition of the site prior to the operation of the Enviroparks (Wales) Limited facility have been documented in various site reports as follows:
- Thomas, Morgan and Associates, "Interpretive Report on Ground Investigation", July 1995.
 - Soil Mechanics "Interpretive Report on Site Investigation" January 2009 and
 - Quantum Geotechnical "Supplementary Geotechnical and Geo Environmental Report" October 2013.

8.6 The expected operational life of the materials recycling facility is 25 years, notwithstanding infrastructure maintenance and repairs, and plant replacement as required. During the Company operations, a regular and systematic assessment of the potential for the facility to impact on soil, groundwater or local water courses will be made, and as necessary, for example in the event that potential contamination is suspected, future site investigations may be commissioned.

8.7 At the point of decommissioning, plant will where possible be sold for continued use, or will be appropriately dismantled for recovery prior to the disposal of any non-recoverables, and the site will be sold in a complete state where the buildings can continue to be used or can be modified for re-use.

9. RESPONSIBILITIES

9.1 The Managing Director has overall responsibility for the planning and control of operations and for ensuring that operations are conducted in accordance with the Environmental Permit and Planning Permission conditions.

9.2 The site is owned and operated by Enviroparks (Wales) Limited, the management structure for which is presented in Appendix 1. The Manufacturing Manager is responsible for all site operations, training, staffing and maintenance. The Manufacturing Manager, assisted by the Quality, Safety and Environmental Manager who is also the technically competent person, supervises daily operations and is fully conversant with the operational requirements and procedures of the facility, and with the conditions of the Environmental Permit. Controlled copies of the Permit and all site operational procedures will be retained within the Site Office.

- 9.3 The Quality, Safety and Environmental Manager is required to hold a relevant certificate of technical competence from WAMITAB and will undertake continuing competence training every two years in accordance with the CIWM/WAMITAB technical competence scheme.
- 9.4 The Quality, Safety and Environmental Manager is responsible for the monitoring of operations at the site and for ensuring that all staff carry out their duties in strict accordance with the Environmental Permit conditions and procedures.
- 9.5 Trained staff will undertake Area Condition Audits on a daily basis to ensure operations are being conducted in accordance with the requirements of the Environmental Permit and other relevant legislation, and that no pollution is occurring. Clear lines of reporting are communicated to all staff for reporting environmental issues/incidents. Any non-compliance found will be recorded and rectified in accordance with the Non-Conformance Procedure.
- 9.6 Staff are fully trained in their roles and responsibilities with regards to site operations, management and reporting. All staff and contractors receive a site induction, and staff receive additional training specific to their roles, including through the use of regular 'toolbox talks' to refresh or highlight changes to operational procedures. This includes training on the Company IMP, how their work may impact on the environment and on the Company's ability to meet the terms of the Environmental Permit, their responsibilities under the Environmental Permit and other environmental regulations, and emergency response and reporting requirements. Site staffing levels, roles and responsibilities are assessed on an annual basis as a minimum, and training requirements are reviewed. Personnel files include training records, which include details of all training and qualifications obtained by the staff Member.
- 9.7 Contractors shall be required to nominate a person who will be responsible for ensuring that their activities comply with the Company's operating procedures and regulatory requirements, and to communicate all issues between the Company and their own staff.
- 9.8 Controlled copies of the Permit and all site operational procedures will be retained within the Site Office which is accessible whenever the site is operational, and staff therefore have ready access to these at any time.

- 9.9 Whenever the site is open for the receipt or treatment of waste it will be supervised by staff of sufficient number and capability to undertake the business activities, and at least one of these will be fully conversant with the site Environmental Permit and this Management Plan regarding:
- Waste acceptance and control procedures;
 - Operational controls and environmental understanding;
 - Maintenance;
 - Record-keeping;
 - Emergency Action;
 - Notification of any incident to Natural Resources Wales / Dwr Cymru / other bodies as appropriate.
- 9.10 Where senior managers are not present on site at the time of any significant breakdown or incident, contact will be made with the relevant manager, who will attend site as necessary to assist with incident control.
- 9.11 Natural Resources Wales will be notified without delay following the detection of:
- Any malfunction, breakdown or failure of equipment or techniques, accident, or emission which has caused, is causing or may cause significant pollution;
 - The breach of any limit specified in the permit;
 - Significant adverse environmental effects caused by the above instances.
- 9.12 The Company will maintain copies of all correspondence and reports from Natural Resources Wales and other regulatory authorities, and will ensure that notifications required under the terms of the Environmental Permit are made to the regulator as soon as possible and in any event, within the specified timelines. Records will also be maintained of any actions taken in response to any reported non-compliance. Copies of all such correspondence, reports and records will be filed and maintained on site, and will be backed up at an off-site location where available electronically. All records will be legible, made as soon as reasonably practicable, amended such that they remain legible, and will be retained for at least 6 years.

- 9.13 An open door policy to the Site Office will operate and should colleagues wish to discuss site procedures, operations, programme of engineering works, compliance, health and safety issues, environmental monitoring or other issues, their input will be noted and acted on as appropriate. The Manufacturing Manager or the Quality, Safety and Environmental Manager will inform staff of any changes in site operation, policy, procedures or permits, as soon as practicable when these occur.

10. ACCIDENTS AND EMERGENCIES

- 10.1 As part of the Integrated Management Plan, the Company maintains a detailed Site Accident and Emergency File which includes full consideration of the potential for accidents and incidents to occur at the site, the possible resultant impact of such incidents, and the control measures employed to guard against and deal with such incidents should they occur.
- 10.2 Additionally, an Incident and Near-Miss reporting and investigation procedure supports the continual review and development of the Site Accident and Emergency File.
- 10.3 The information collated and regularly reviewed within the Site Accident and Emergency File, results in a Site Fire and Emergency Procedure, which specifies the actions to be taken in the event of any such incident, e.g. fire, spill, flooding etc occurring.

11. MAINTENANCE OF PLANT AND EQUIPMENT

- 11.1 A preventative maintenance programme is in place so that all site plant and site infrastructure are subject to regular inspection and maintenance. Where applicable this is in line with the manufacturer's recommendations, and may be undertaken or contracted by the manufacturers.
- 11.2 All vehicles, plant and equipment necessarily employed for operations at the site will be appropriately maintained where the capability, suitability and reliability of their performance could affect:
- Compliance with regulatory controls;
 - Safety;

- Environmental protection;
- Conformance to any customer requirements;
- Operational efficiency.

11.3 The Manufacturing Manager is responsible for arranging the scheduled maintenance and repairs of plant and equipment. All new equipment will be provided with a suitable schedule for inspection and maintenance in line with the manufacturer's recommendations.

11.4 It is the responsibility of plant operators to carry out the day to day, pre-use checks of vehicles, plant and equipment. Pre-use checks are audited by the Shift Supervisor. The maintenance of vehicles is undertaken by approved contractors.

Plant and Equipment

11.5 The Maintenance Manager will ensure that plant and equipment used for operations at the site are routinely serviced by the supplying dealer, trained staff, or approved contractors.

11.6 The frequency of servicing will be in accordance with the manufacturer's recommendations. A maintenance worksheet will be completed and stored on site to record all routine inspections and maintenance.

11.7 Routine daily inspections will be made by competent staff to ensure the effective operation of all plant and to identify any apparent problems with site infrastructure. More detailed inspections of plant and infrastructure will be carried out in accordance with a written inspection schedule maintained for each item. Any defects and breakdowns will be actioned and recorded on the maintenance worksheet, or will be reported to the Maintenance Manager or competent delegate, who will schedule the item for maintenance/repair. Maintenance may be undertaken during the working week where operations allow, or will be scheduled at the earliest opportunity, e.g. over a weekend.

11.8 Details of plant maintenance and repairs carried out will be added to the equipment maintenance history file and will be kept on site alongside the routine maintenance/inspection worksheets.

- 11.9 All maintenance and repairs will be carried out in a manner which does not present a risk to the environment. For example all oils will be drained into a sealed container and disposed of/recycled appropriately. Contractors carrying out repairs on the site will be required to provide risk assessments and method statements for their work prior to commencement, and will be provided with a list of 'Do's and Don'ts' which will ensure that all activities are appropriately managed.
- 11.10 The Site Fire and Emergency Procedure includes a detailed Spill Procedure, which drivers and contractors are informed of during the course of their site induction. The Manufacturing Manager is responsible for all site management, including maintenance operations.

Major non-productive items

- 11.11 All tanks, bunds, pipework, hard standing areas and other static items of equipment, whose failure could lead to an adverse impact on the environment, will be visually inspected at least weekly, by a trained member of staff. Any defects will be reported to the Manufacturing Manager and recorded through the Incident and Near-Miss Procedure.
- 11.12 The Weighbridge Operator or another trained and competent member of staff is responsible for overseeing the delivery of fuels into the fuel tank which is located adjacent the weighbridge. The fuel supplier is required to provide a risk assessment and method statement in advance of any fuel delivery being received and will be invited to make a pre-delivery inspection to ensure that they are satisfied with the access to the tank. All drivers visiting the site for the first time will undergo the site induction at the weighbridge before being allowed access to the site.
- 11.13 The level of fuel within the tank is checked before each delivery to prevent overfilling of the tank. The first delivery from any fuel supplier will be directly observed and audited by the Weighbridge Operator, and future deliveries will be regularly audited. Spill kits are available in the vicinity of the fuel tank and the Weighbridge Operator and other site staff are trained in their use and the Spill Procedure.

12. CONTRACTOR USE AND SUPPLIER APPROVAL

- 12.1 Suppliers of items and services which could affect the ability of the Company to meet all of the regulatory requirements relating to its activities at the site must be assessed and approved prior to commissioning. The Managing Director has overall responsibility for approval of suppliers and contractors and implementation of this procedure.
- 12.2 Evaluation and approval procedures will vary for different types of supplier dependent upon the nature of the product or service supplied, and the significance of quality failure upon the activities of the Company. The relevance or otherwise of approving suppliers for any role or supply will be based on a risk assessment of the scope of works. Where an item is unlikely to impact on the site's ability to meet its quality, health, safety or environmental obligations, for example the use of a particular supply of recycled paper to the site office, the purchaser can specify the supplier simply subject to the item being fit for purpose. Where however a potential failure in the quality or service, or a non-conformance with site procedures could have a significant impact on the site's ability to meet its quality, health, safety or environmental obligations, for example when choosing a laboratory to analyse samples, consideration of any relevant certification, quality standards, best practice and operational practices will be taken into account in a formal evaluation, prior to plant or services being approved and commissioned.
- 12.3 Initial approval will be based upon one or more of the following:
- Service and terms etc with particular emphasis on flexibility, speed of delivery, credit period and discounts;
 - Availability of items or service;
 - Customer recommendation;
 - Previous performance of the supplier in supplying similar items or services;
 - Review of performance for other Clients;
 - The review of the suppliers published data or submission and evaluation of samples;
 - Adoption and adherence to industry standards and best practice;
 - The environmental impact of products or services;
 - For contractors, the quality of service – ability to meet pre-determined standards of work and from previous experience.

- 12.4 The Managing Director will have discretion over which of the above criteria will be chosen as the basis for approval. Approval procedures will be followed for both the approval of a new supplier of a current item, and for the supply of new items. A list of all approved suppliers will be maintained.

13 NEW FACILITIES AND PROCESS CHANGE

- 13.1 The Managing Director is responsible for ensuring that environmental factors are taken into account when new developments or changes to processes involving capital expenditure are being planned, or where services that affect the ability of the Company to operate the site in accordance with the requirements and expectations of its customers and relevant regulatory bodies are being considered.
- 13.2 When planning new processes, plant or equipment, or major changes to existing processes, plant or equipment the environmental aspects of the process or the equipment shall be taken into account, including:
- Consideration of the best available techniques;
 - Energy efficiency;
 - Water consumption;
 - Emissions including noise, dust and odour;
 - Effluents;
 - Prescribed processes;
 - Planning and permitting requirements;
 - Risk of an emergency and
 - Options for recovery or recycling during decommissioning.
- 13.3 The purchase of all items of capital cost outside normal expenditure limits will be authorised only by the Managing Director of the Company.
- 13.4 Purchase of new equipment and services will be carried out in accordance with the documented Contractor Use and Supplier Approval Procedure.

14. NON-CONFORMANCE

14.1 All Company operations undertaken at the site will be subject to a Non-Conformance Procedure where they are found not to conform to regulatory or operational requirements.

14.2 Any person who becomes aware of an incident, a near miss, or a non-conformance shall report details to the Shift Supervisor or any other Manager in the first instance. The Shift Supervisor shall record the following details on the Environmental Incident/Non Conformance Form:

- Date and time of the incident;
- Origin or location of the incident;
- Description of the incident;
- Any immediate corrective action taken to overcome or contain the incident.

14.3 The Company operates a three tier investigative process as follows:

Investigative Requirement:	Primary Investigator:	Supported By:
Rudimentary / Shop Floor	Shop Fitter	Supervisor
Detailed Investigation	Supervisor	Senior Manager
Highest Level / Company Critical or Sensitive Issue	Senior Manager	Managing Director

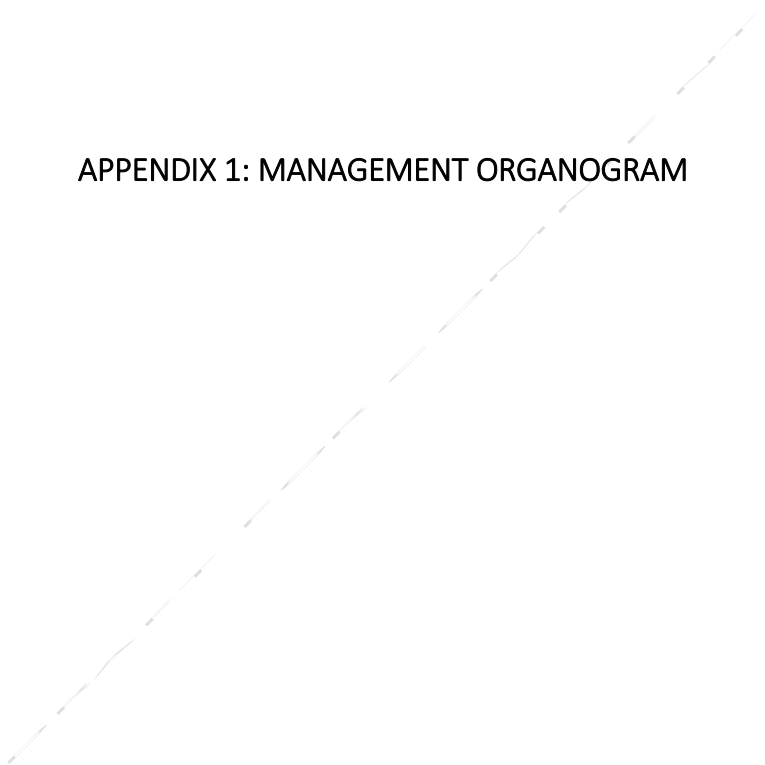
14.4 Where possible, corrective action will be initiated immediately and the incident can be signed off by the Shift Supervisor as appropriate. As required however, the initial assessment can be escalated to the Quality, Safety and Environmental Manager for further assignment or investigation.

14.5 Where an incident has been escalated, the Manufacturing Manager is responsible for deciding what preventative action is required and for ensuring that any action identified, is taken and is effective. Where there is a major non-conformance or a risk of significant pollution the Quality, Safety and Environmental Manager will report the incident to the Managing Director and to Natural Resources Wales.

- 14.6 The Quality, Safety and Environmental Manager is also responsible for undertaking a weekly audit of the Incident and Near-Miss Log, in order to confirm that appropriate and timely action, escalation and improvements have been made.
- 14.7 Non-conformance is defined as:
- i) Any problem or incident that might affect the environment or the ability of the Company to meet the requirements of:
 - Environmental Permit conditions;
 - Permitted emission limits;
 - External regulatory authority requirements;
 - Relevant legislation.
 - ii) Any problem or concern that could substantially affect operational safety or internal performance at the site.
 - iii) Any uncontrolled deviation from operational or management procedures.
- 14.8 Incidents will include, although are not limited to any of the following: fires, accidents (major or minor), break downs, receipt of non-permitted waste, breach of emission limits or other limits set in the Environmental Permit.
- 14.9 The Quality, Safety and Environmental Manager and the Managing Director shall agree whether any long-term preventive action is appropriate. The details shall be entered on the relevant Environmental Incident/Non-Conformance Form, and circulated to the relevant staff to be actioned. Site Operating Procedures will be revised where necessary to prevent recurrence.
- 14.10 The Manufacturing Manager shall in due course check that the preventive action has been completed and that it has been effective, or is likely to be effective, in preventing a repeat of the incident. Where the action has proved effective, the Environmental Incident/Non-conformance form will be signed and filed.

15. COMPLAINTS PROCEDURE

- 15.1 The maintenance of good relationships with customers and neighbours is a significant factor affecting the success and growth of any business. Concern for Company customers and site neighbours is part of the overall business strategy of the Company. Should complaints occur, they will be dealt with promptly, efficiently, and in a courteous manner.
- 15.2 A 'complaint' is defined as a communication received from, or on behalf of, a customer, neighbour, member of the public, or regulatory authority expressing dissatisfaction with the operations carried out at the site or the waste management services provided. Complaints regarding financial or contractual matters fall outside the scope of the Site Complaints Procedure.
- 15.3 The Company operates a Site Complaints Procedure, which has been developed to ensure that:
- An efficient and proper response to environmental complaints and comments is provided through defined steps of recording, investigation and evaluation;
 - Corrective actions are implemented, where appropriate, to avoid future complaints and strengthen neighbour and public relations.
- 15.4 It is the responsibility of the Quality, Health, Safety and Environmental Manager to review all complaints, comments and incident reports and recommend suitable corrective actions, where these are deemed necessary.
- 15.9 The Quality, Health, Safety and Environmental Manager and Managing Director will also review the complaints logged at least annually, to consider trends and ensure that operational procedures are revised where required.



APPENDIX 1: MANAGEMENT ORGANOGRAM

