

Waste Management Consultancy Limited.

Environmental Protection Act 1990

Environmental Permitting Act (England and Wales) Regulations 2007

ENVIRONMENTAL MANAGEMENT SYSTEM

For

A &T WASTE DISPOSAL COMPANY

WASTE TRANSFER STATION

CURRAN ROAD, CARDIFF

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Environmental Permitting Act (England and Wales) Regulations 2007

CONTENTS

Section 1	Introduction and Summary
Section 2	Identification of Risk
Section 3	Proposed Operations
Section 4	Staffing and Management Competency
Section 5	Site Preparation
Section 6	Site Security
Section 7	Waste Receipt and Removal Control
Section 8	Waste Storage
Section 9	The Treatment Process
Section 10	Emissions and Monitoring
Section 11	Amenity Considerations
Section 12	Maintenance of Infrastructure
Section 13	General Housekeeping
Section 14	Record Keeping

ANNEX

Annex 1:	Site Location Plan
Annex 2:	Adopted Risk Assessment

Section 1: Introduction and Summary

- 1.1 **A&T Waste Disposal** has been established as a waste transfer station for over 30 years and provides an important service to the Cardiff area. The Company is located at Curran Road, Cardiff. The site location is illustrated in Annex 1 of this Environmental Management System.
- 1.2 The Company specialises in the collection and transfer of household, industrial and commercial waste materials with the national and the local emphasis on the recovery of wastes rather than the disposal of wastes it has responded by diversifying into the salvage of recoverable wastes.
- 1.3 For the most part demolition wastes received from construction sites, site clearances and redevelopment sites such as waste concrete, soil, other inert wastes and non-hazardous wastes such as wood, metals and plastics are re-used or recycled as part of either new development projects site cover materials or are recycled to companies for secondary recovery. There are, however occasions when waste quantities are in excess of demand and/ or are not suitable for re-use.
- 1.4 The Permit Holder has developed and improved the facility in order to provide a comprehensive waste transfer and recovery service. The facility is equipped to provide a safe and effective waste recycling facility, equipped to manage the safe separation and effective separation of the following materials: metals, plastics, timber, glass, paper, ferrous and non-ferrous metal, demolition and construction contract waste. This includes materials from both new build and refurbishment contracts.
- 1.5 The economics of waste recovery and recycling can be uncertain. This is as a consequence of fluctuating demand for the recovered materials, and the varying composition of the waste materials received at the site. This will lead to occasions when materials will have to be stockpiled on the site (pending market place improvements) or when disposal to other authorised outlets will be necessary. The prime usage of the facility remains as a waste recycling separation and transfer facility. The site storage areas are illustrated on drawing ref. A&T/PF/002 in the Site Working Plan
- 1.6 The site is located approximately 1km.from residential development in an area which has an established industrial history, to include scrap

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Environmental Protection Act 1990

Environmental Permitting Act (England and Wales) Regulations 2007

metal dealerships, paper recovery plants and other general waste disposal facilities. The potential for the site to have any adverse effects on the local neighbourhood is negligible.

- 1.7 The operators are however aware and proactive in undertaking their environmental responsibilities and have improved the facility over time to ensure compliance with the progressive waste management legislation. This has enhanced the operation of the facility. The current arrangements and infrastructure, are detailed in this Working Plan.
- 1.8 Wastes received at the facility include rubble, hard-core, soils, timber, paper, card, glass, plastics and metals arising locally from industrial, commercial and domestic sources.
- 1.9 Putrescible wastes will not knowingly be permitted. In the light of this and the details provided on the site infrastructure above the potential for detrimental environmental should be minimal.
- 1.10 The Environmental Permitting Regulations require that the site activities are managed and operated in accordance with this **Environmental Management System (EMS)** that identifies and minimises risks of pollution or harm. It is intended that this Environmental Management System- prepared in accordance with The Environment Agency's guidance "Getting the Basics Right" dated April 2008, meets the requirements and serves as a model for undertaking all future waste transfer and recycling operations.
- 1.11 The facility gained Full Planning Permission from Cardiff City Council on the 26th November 1999.

Section 2: Identification of Risk

- 2.1 Methodology:** The Environment Agency has published a generic risk assessment that applies to Standard Rules Permits. Whilst this site is operated under a bespoke permit, these principles have been adopted by A&T Waste Disposal Company as the format for overcoming potential environmental risks at the permitted site. This risk assessment is presented as Annex 2 to this Environmental Management System (Annex 1)
- 2.2** In accordance with the permit condition that are within the specified waste management operations the waste management activities fall under the following site operations:
R2, R3, R4.R13 (Recycling of specified materials and their storage respectively).
- 2.3** In accordance with the original site working plan and site permit the wastes that may be received at the site are restricted to the following types.

Waste Type

Inert (rubble, hardcore, soil)

Mixed non-hazardous waste
(for sorting and recycling)

Scrap Metal
(ferrous and non-ferrous)

Timber

Paper & Card (netted)

- 2.4** On this basis, and with due reference to the appended site risk assessment and the "Accident Management Plan" the potential environmental risks requiring programmed attention by the Permit Holder are:
- Airborne matter (litter and dust) from the movement, storage and recycling of the permitted wastes

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Environmental Protection Act 1990

Environmental Permitting Act (England and Wales) Regulations 2007

- Odours arising from the wastes
- Noise and vibration from vehicles attending the site and from the sorting and segregation of the wastes
- Scavenging by birds or animals
- Breeding of flies and insects
- Surface water flooding within the facility
- Physical harm to visitors or intruders from on site hazards such as vehicles, plant and equipment
- Fire due to site accident or arson

2.5 Each of these potential risks is dealt with in both this document, the Working Plan and the Site Accident Management Plan and the procedures for ensuring their control and amelioration detailed accordingly.

Section 3: Proposed Operations

3.1 Waste Types and Treatment Processes

3.1.1 Approved Waste Types

The only wastes that may be received at the site are:

- Inert (rubble, hardcore, soil)
- Mixed non-hazardous waste (for sorting and recycling)
- Scrap Metal
ferrous and non- ferrous)
- Timber
- Paper& Card (netted)

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Environmental Protection Act 1990

Environmental Permitting Act (England and Wales) Regulations 2007

3.1.2 Approved Waste Quantities: Permit No. EAWML 30262 enables the site to receive up to 25,000 tonnes of non- hazardous and inert wastes per annum to be received and sorted for prior to recycling.

3.1.3 Waste Quantity Measurement and Related Records: There is no on-site weighbridge. Weights of incoming materials are determined by either weighing on a public weighbridge or from conversion of the delivered volume to tonnage using the Environmental Agency conversion factor.

Similarly, outgoing materials will be either weighed at a public weighbridge or weights estimated using the above Environment Agency recommendations

In all cases the quantities will be recorded and maintained at the Company's offices at Curran Embankment, Cardiff. These documents will be available for inspection as required by the Environment Agency

In addition to this under the Duty of Care regulations records are maintained for waste originators and disposal points to ensure that all the companies that the Company trades with have the required permits in place.

This data will include EWC codes, name, address and Permit no. of the disposal company taking any recycled waste for reuse. This is the data required by the Environment Agency Waste Return Form WMS1

3.1.4 Permit Treatment Processes: The waste management activities that may be undertaken at the site in accordance with the Site Permit will be limited to the following processes:

- Sorting
- Separation
- Recycling

Section 4: Staffing and Management Competency

4.1.1 Management: The following senior members of the Company will personally ensure that there is adequate provision at all times of the necessary Technically Competent Management of the Facility. This will be undertaken initially through the deemed competence provisions of the 'Waste Management Regulations 1996' –Regulation 4.

Page 7 of 37

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Environmental Protection Act 1990

Environmental Permitting Act (England and Wales) Regulations 2007

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Environmental Protection Act 1990

Environmental Permitting Act (England and Wales) Regulations 2007

Name	Position	Years relevant experience
Alan Roberts	Owner	35
Warren Roberts	Manager and COTC	22
Wayne Roberts	Transport Manager	30

***Residual Risk:** The availability of the COTC qualified staff member for the site operation should ensure adequate professional cover of the site operation at all times. If holiday cover is required qualified staff are sought through agency.*

4.1.2 Staff Training: The site COTC holder is required to keep abreast with all changes to legislation as part of his continued professional development requirements.

There will be at least 3 operatives and one member of the administrative staff at the Facility during operational hours. They will be supplemented with temporary staff as necessary according to workload requirements.

The site operatives will be trained appropriately and will be made aware of the existence of the Site Permit, Site Working Plan and Accident Management Plan.

They will also be made aware of the requirements to take all reasonable measures to safeguard the environment and the local amenities whilst undertaking their site duties.

They will also be advised of the role of the Agency in enforcing the associated controlling legislation.

All operatives will receive operational training relevant to the receipt, storage segregation, recycling and the handling of wastes. Where appropriate, employees may also be required to attend relevant professional training to improve their understanding of current statutory waste controls.

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Environmental Protection Act 1990

Environmental Permitting Act (England and Wales) Regulations 2007

Operatives at the facility will also be required to follow laid-down procedures in regard to any segregation of waste materials and the operation of plant and machinery the Facility.

These will be subject to periodic review as necessary. The written procedures will describe the best practise approach to the following:

- Receiving and inspecting wastes
- Record keeping
- Dealing with unauthorised wastes
- Tipping loads
- Sorting and segregating waste
- Safe storage of waste
- Dispatch of products and residues
- General housekeeping this will include site cleanliness and environmental protection
- Equipment maintenance, inspection and maintenance of the site infrastructure and drainage system

4.2 Site Permit and other Operational Documentation

A copy of the site permit, Site Working Plan and the Site Accident Management Plan are available for reference at the site offices on Curran Embankment

Residual Risk: The training detailed above on site operational awareness and through individual CPD requirements should further reduce the risk to the environment that could result from the operation of the facility and from transgressing from the waste management legislation

Section 5: Site Preparation

5.1 Prior to the site becoming operational and before any waste was received at the site and as required under the Environmental Permitting Regulations the following site infrastructure has been installed

5.1.1 Engineered Site Containment and Drainage

Hard-standing and Impervious/non-porous Pavement: The site is covered with an impermeable, non-porous surfacing that is graded to allow the surface water drainage of the site to be collected in the gully pots before flowing to the site interceptor and then to the foul sewer.

Page 10 of 37

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All storage of skipped waste shall be on the impervious tarmac area and contained by a sealed impermeable sill.

All other areas of the site where vehicles may drive, manoeuvre or park or where skips may be stored will be on non- porous impermeable surfacing.

Details of the construction of the concreted areas are presented in Construction Quality Validation Report, which will be supplied following completion of the works.

Provision has been made for the storage of drums in a contained area as illustrated on the site layout plan contained within the Site Working Plan. The capacity of this area is such that the total capacity of the area exceeds the largest drum capacity by at least 10%. This area shall be directly tied into the interceptor system. This system will be maintained in good condition at all times. Any surface water collecting within it removed for safe disposal where necessary.

Concreted areas of the site will be inspected on a weekly basis by the site management and comments on their condition recorded in the Site Diary.

Areas with wear and tear will be repaired as quickly as practicable. (This will depend on the current operational requirements of the Facility and the perceived risk of potential environmental hazard). but within 2 months of the deterioration being reported. The dates of the repair work will be recorded in the Site Diary.

Hard-standing areas will be inspected on a monthly basis and repaired as necessary to maintain the integrity of the surfaces. The dates of such inspections, the findings of the inspection and the required remedial action will also be noted in the Site Diary.

5.1.2 Site Drainage System: A drainage and interceptor system is currently being installed at the site to collect all surface waters from impervious surfaces. This is identified on the Site Drainage Plans (Appendix 3 to the Site Working Plan).

As previously detailed in the text of this Working Plan impervious areas will be profiled to ensure that surface waters will drain into the

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Environmental Protection Act 1990

Environmental Permitting Act (England and Wales) Regulations 2007

interceptor system before running to the foul drainage system which services the Facility. The construction details of the system are presented in the appendices to the Working Plan. drawing ref. A&T/PF/003.

Monitoring: The drainage system and the interceptor will be inspected weekly by the Facility Management and any necessary cleaning undertaken without undue delay to ensure the integrity of the system and to minimise environmental hazard. This will ensure a free flow of the system. The results of the inspections will be recorded in the Site Diary.

5.1.3 Underground Tanks: There are no known underground tanks relating to this facility.

5.2 Site Enclosure: The site is enclosed by a continuous steel perimeter fence of 2.0 metres height. Access and egress is via the gates onto Curran Embankment.

5.2.1 Maintenance: The site fences and gates are inspected daily by the management and repaired or replaced as necessary. Any deficiencies in the system and any security incidents will be recorded in the Site Diary (with the details of any remedial works or actions taken).

5.3 Site Notice Board: This has been installed at the site gates in line with the Environment Agency's requirements and details the following information:

- The Permit Number
- The Permit Holder's Name
- Operational Hours
- Emergency Contact numbers
- The Environment Agency's Telephone Numbers 0870 8506506
- The Environment Agency Incident Hotline Number : 0800 807060

***Residual Risk:** The site has been constructed from non-porous impermeable materials and a bespoke drainage system has been installed at the site. This together with the site operational activities being restricted to the engineered containment will minimise the potential for environmental harm*

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Environmental Permitting Act (England and Wales) Regulations 2007

Section 6: Site Security

6.1 The site lies within the industrial area of Curran Road in Cardiff. The site is secured by a 2.0 metre high fence and access and egress is restricted to the lockable gates on Curran Road. A floodlighting and C.C.T.V. system have been installed at the Facility. There is an alarm system on the office tool shed and other facilities which links directly to the police station.

6.1.2 All visitors are directed by the site signage to the site office and are required to sign in the visitors' book. All visitors are required to wear protective clothing and footwear whilst on site to the same standard that is required for all site operatives.

6.1.3 A monitoring and maintenance schedule is detailed within the Site Working Plan and such activities are recorder in the site diary

6.2 **Operational Hours:** The site is operational during the following hours:

Weekdays	07.00hours to 17.00 hours
Saturdays	07.00 hours to 13.00 hours
Sundays	No Working
Bank Holidays	No Working.

***Residual Risk:** The above controls should ensure that the site security measures are maintained to an effective standard throughout the life of the facility, and that any risk of accidental or malicious damage to the site operations or operational plant is minimised. The site operating procedure and site rules for both employees and site visitors further reduces the risk of personal and environmental harm from the site activities.*

Section 7: Waste Receipt and Removal

7.1 As the Facility receives only domestic, commercial and industrial inert and non-hazardous waste there is limited risk of the receipt of potentially hazardous or polluting wastes. For the most part the Facility receives wastes from known suppliers

Page 13 of 37

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Environmental Protection Act 1990

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- 7.2 **Acceptance Protocol:** Acceptance procedures are already in place to ensure that all parties are aware of the wastes that may be accepted at the Facility.
- 7.2.1 All the loads collected by the Permit Holder are initially checked at the producer's premises. No waste is accepted from third party deliveries.
- 7.2.2 On arrival at the Facility they are assessed on the top of the wagon. The accompanying delivery notes or Duty of Care Notes are scrutinised by the 'Responsible Person' and as appropriate checked against the annual ticket. As a minimum the Duty of Care tickets are maintained for the statutory period. These tickets will be available to the Agency for inspection.
- 7.2.3 Any suspicious contents (leaking drums, gas cylinders or sealed containers for example) noted at this time will be scrutinised by the 'Responsible Person'
- 7.2.4 Closer inspection of the load will be undertaken on unloading on the impermeable area of the Facility. If the load is outside the terms of the Site Permit then the waste will either be returned to its originator or quarantined at the Facility pending further investigation. In the event of such actions all details will be recorded in the Site Diary.
- 7.2.5 Further inspection of the load will be undertaken should it be deemed suitable for separation. Offending wastes will be removed and quarantined. The quarantine area is shown on drawing ref. A&T/PF/002 in the Site Working Plan.
- 7.2.6 The Agency may be consulted with regard to the rogue waste so that appropriate waste removal and disposal routes are utilised.
- 7.2.7 In the event of gas cylinders being found in a waste consignment they will be transferred for safe storage to a free venting but enclosed storage bin. This will be done until the cylinder can be removed by a specialist contractor.
- 7.2.8 The site operatives will provide a continuous update to the permit holder on available capacity at the Facility. In the event that allocated storage space is reduced then the waste supplier will be asked to hold waste at source until space is made available at the Facility. This will

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Environmental Protection Act 1990

Environmental Permitting Act (England and Wales) Regulations 2007

ensure that site safety and the local amenity is not compromised. The storage of re-usable, recycled and sorted materials will be in the position shown on the site layout plan, drawing ref. A&T/PF/002 in the Site Working Plan.

7.2.9 Wastes (as opposed to reusable materials which have ceased to be wastes) leaving the Facility for further treatment, disposal or recovery will be fully contained in accordance with the Duty of Care. They are to be transported only by a registered waste carrier and dispatched only to authorised outlets. These detailed procedures are presented in the Site Accident Management Plan.

7.2.10 In the event of any quarantined wastes held at the Facility being classified as Special Wastes they will be removed from the site within 7 working days and subject to the correct completion of the consignment notes. All other quarantined wastes will be removed from the Facility to an authorised waste disposal outlet within 30 working days of their initial receipt at the Facility. The quarantined area is indicated on the appended site layout plan, drawing ref. A&T/PF/002 in the Site Working Plan.

7.2.11 Waste suppliers will be periodically visited and their control procedures assessed to safeguard the Licence Holder's position.

7.3 **Waste Sampling and Testing:** If any uncertainty exists over the content of a specific load, for example by oil contamination or by asbestos then the load will be quarantined as previously described. Advice sought to include that of the Agency.

7.3.1 If a waste delivered to the Facility requires more detailed chemical analysis then it will not be accepted until the advice of the Agency has been sought. This waste shall be removed from the Facility within a maximum of 7 working days and the quantity stored shall not exceed that permitted by the site licence or the capacity of the storage area indicated on the site layout plan, drawing ref. A&T/PF/002 in the Site Working Plan.

7.3.2 When sampling is undertaken the results will be recorded in the Site Diary. Records of all results will be available for inspection by the Agency at the Facility's offices.

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Environmental Permitting Act (England and Wales) Regulations 2007

- 7.3.3 All records including any tickets will be kept on site for a minimum of 12 months then transferred to the Permit Holder's private address for a further 24 months. These will be made available to the Agency on request.
- 7.4 **Duty of Care:** A&T Waste Disposal will ensure that statutory Waste Transfer Notes are raised to cover all deliveries to the site and are completed in compliance with the current legislation. In the case of a number of deliveries being made from the same production site over a period of time, use may be made of a season ticket arrangement. However, for accurate accounting purposes, the Company will ensure that a discrete record is kept of the composition, source and quantity of each load. Copies of these transfer notes will be kept within the Company's offices for the statutory two year period and will be made available to the Environment Agency for inspection on request.
- 7.5 **Quantification and Record Keeping:** All records of deliveries to the Facility and despatches from the Facility are maintained at the Facility's offices or at the Licence Holder's private address. These include copies of the Duty of Care Transfer Notes and are available for inspection by the Agency on request. Waste returns will be made to the Agency in accordance with their requirements

Section 8: Waste Storage

- 8.1.1 The Facility does not deliberately accept unspecified waste. If, however, rogue wastes are received into the Facility then they may be returned to the supplier where possible and a non-conformance report made and issued to the originator of the waste. These reports are detailed in the Company's Accident Management Plan.
- 8.1.2 Alternatively they may be quarantined and analysed prior to disposal to an appropriate waste facility.
- 8.1.3 In the event that Asbestos is suspected in a load of waste and cannot be returned to the supplier, then it will be damped down and removed either carefully by machine or by a suitably trained and protected operative. The waste will be placed in a suitable lidded container to await specialist removal.

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Environmental Permitting Act (England and Wales) Regulations 2007

- 8.1.4 The storage periods and volumes that may be accepted at the site are detailed in the Site Working Plan. They are classified as inert or non-hazardous waste.
- 8.1.5 Liquid wastes are not accepted at the site. However in the event of a rogue liquid waste being contained in a waste load received at the site a spillage protocol can be employed. This is detailed in the Site Accident Management Plan

***Residual Risk:** The care and safe working practices that are documented in the Site Accident Management Plan and the Site Working Plan in association with the annual review of site operations ensure that the risk to the environment from the site storage activities are minimised.*

Section 9: The Treatment Processes

- 9.1 The site produces segregated wastes for the recycling industry.
- 9.2 Any construction waste will be recycled as cover material for landfill or re-used in construction activities.

Residual Risk: The close attention to recycle quality and detailed segregation of waste on site ensures that a viable product is produced with the minimal amount of waste going to landfill. This enables the Company to employ the pre-treatment requirements for waste acceptance at landfill sites and meets the requirements of European Landfill directive.

The attention to recycle quality and the minimal use of plant on site together with planned maintenance programmes minimises the risk of environmental harm from the site operations.

The Company also employs a strict monitoring regime of the localised impact of its activities to minimise the effects of the statutory nuisance of noise, dust and odour.

Section 10: Emissions and Monitoring

- 10.1 **Point Source Emissions:** There will be no point source emissions from the facility. Incident rainfall will soak away and on areas of hard-standing is directed to the site interceptor system.

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- 10.2 Other than rainfall there will be no other liquid discharges at the site as the waste segregation and recycling operations may be described as “Dry Processes”
- 10.3 **Monitoring:** A detailed monitoring regime is employed on site and records maintained in the site diary of any statutory nuisance incidents. These are covered in Section 11 of this document.

Residual Risk: As with section 9 the conscientious operation, control and monitoring of the site operations should minimise the environmental impact of the site operation.

Section 11: Amenity Considerations and Control

- 11.1 **General Considerations:** The Facility is located within an industrial area with similar site activities. Consequently, its contribution to dust nuisance within the area is negligible.
- 11.2 All precautions will however be taken to ensure that these problems are minimised. Offending wastes will be dampened down or sheeted over to minimise emissions. In addition, when necessary impervious surfaces will be swept to remove fines and damped down in dry weather.
- 11.3 **Control of Mud and Wastes:** As the site has a non-porous, impermeable surface it is unlikely that tracking mud and debris onto the highway will be a problem.
- 11.3.1 Wastes will be delivered to the site in covered or netted skips and arisings will be transported off site in the same manner. Currently all site vehicles are cleaned at a local garage. Should any cleaning of vehicles be undertaken at the Facility the operator will ensure that all necessary precautions are undertaken to route the waste water and detritus to the interceptor system.
- 11.3.2 Both the site entrance and the adjacent highway will be inspected daily and any fouling arising from the site operations be removed within 24 hours. Records of any incident will be kept in the Site Diary.
- 11.4 **Potentially Polluting Spillages and Leaks:** In general the types of waste accepted at the Facility and the site infrastructure preclude any significant environmental risk. Deliveries are usually from consistent

Page 18 of 37

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sources or in a solid form. This together with the attendant Duty of Care obligations will ensure that any significant environmental risk is reduced and good housekeeping maintained.

The following methods will be employed to further safeguard the integrity of waste loads arriving at the site.

11.4.1 Practical Controls: Drivers arriving at the site are required to report to the 'Responsible Person' on the site on that day. An initial inspection of the load will be undertaken and the driver directed to the appropriate area of the Facility for the waste type.

11.4.2 All loads are initially inspected to ensure that they are secure and safe to handle. If a load is not secured then the supplier will be advised. This will ensure that all future loads are secure and sheeted as required. Where outgoing loads are likely to pose a similar problem they shall be properly secured before leaving the Facility.

11.4.3 If, despite the appropriate precautions being undertaken an incident does occur within the confines of the Facility, this will be cleared up immediately or advice will be sought on dealing with the incident.

11.4.4 Any incident or spillage will be recorded in the Site Diary.

11.5 Groundwater Monitoring and Reporting Systems: As previously described wastes with any contamination potential will be stored only on impermeable surfaces. It is therefore unlikely that groundwater contamination will occur.

11.6 Surface Water Quality Monitoring and Reporting. There are no surface waters in the vicinity of the site.

11.7 Monitoring and Recording of Meteorological Conditions: It is envisaged that meteorological changes will introduce no additional risk to the Facility's operation. Any alteration to this will be notified to the Environment Agency.

11.8 Dust and Litter: The Facility's activities are monitored by the Licence Holder on a daily basis. The Operator will respond immediately in the event of a significant dust problem.

Waste Management Consultancy Limited.

Environmental Protection Act 1990

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11.8.1 Any complaints from neighbours will be investigated and, as necessary dealt with.

11.8.2 Records of any complaints or of abnormal conditions relating to dust will be kept in the Site Diary, as will the actions taken as a consequence of the circumstances. These records will be available for inspection by the Agency.

11.9 Control of Odours: As the Facility receives only a limited range of wastes as detailed in the Site Working Plan, the presence of odorous wastes is rare. A responsible person will evaluate the Facility on a weekly basis for the presence of odours and any offensive odours will be noted in the Site Diary. The source of the problem will be investigated and dealt with as appropriate. Should any action be necessary it will be recorded in the Site Diary.

11.9.1 All putrescible waste received at the Facility shall be removed within 48 hours and any special waste shall be removed within 7 days.

11.9.2 At intervals of no more than 3 months, in agreement with a pre-arranged programme all hard-standings and storage areas will be thoroughly cleaned with a biodegradable detergent/cleanser. A record of this will be kept in the Site Diary.

11.10 Control and Monitoring of Noise: The Facility is located within a busy industrial area with no nearby residential properties likely to be affected by noise. The site operator will ensure that all noise is kept to a minimum this will be achieved as follows:

- Drop heights will be kept to a minimum
- All mobile plant is silenced and maintained in accordance with the manufacturer's current standards
- General site noise will be constantly reviewed
- Operational activities are controlled by the Planning Permission for the site

Any complaints will be dealt with as a priority.

Waste Management Consultancy Limited.

Environmental Protection Act 1990

Environmental Permitting Act (England and Wales) Regulations 2007

The general operating noise levels will be kept under review by the “Site Responsible Person” and any abnormal levels recorded and rectified as soon as possible.

Professional noise measurements will be taken by a qualified service provider if a specific problem persists. Any abnormal noise problems or related complaints and resulting actions will be noted in the Site Diary. The results of any noise monitoring exercises will be available for inspection by the Agency.

11.11 Control of Vermin and Pests: Waste of a nature likely to attract vermin and pests is not normally received at the site. The rapid turnover of materials and the cleaning detailed in the Site Working Plan will preclude the establishment of habitats. However, should a recurring problem persist then a contract will be placed to rectify the problem.

11.12 Control of Litter: The nature of the wastes received at the Facility and the secure, continuous fencing of the premises controls litter movement. Wastes will be handled with care and due note of weather conditions made.

***Residual Risk Assessment:** The implementation of the routine detailed in this section of The Environmental Management System to include the good practice of regular monitoring of the site and the detailed procedures in the Site Working Plan and The company's Accident Management Plan will mitigate against the potential environmental harm of the operation of the Facility*

Section 12: Maintenance of Infrastructure

12.1 Infrastructure monitoring is detailed in the Site Working Plan and includes the following items:

- Inspections and actions re. impermeable surfaces
- Inspections and actions re. Hard-standings
- Inspections and actions re. Drainage
- Inspection and maintenance of security measures
- Inspection and action on mud on the road
- Action on spillages
- Action re. Fire incidents.

Waste Management Consultancy Limited.

Environmental Protection Act 1990

Environmental Permitting Act (England and Wales) Regulations 2007

- Details of rogue wastes and actions
- Details of any waste sampling
- Details of complaints and actions
- Inspections and actions on odours, noise, vermin and pests, litter

12.2 The **Site Diary** and all the records referred to in this document , the Site Working Plan and The Company's Accident Management Plan will be maintained securely within the Facility's Offices or the Proprietor's private address. These records will be available for inspection at any reasonable time.

Section 13: General Housekeeping

- 13.1 **Site Inspection:** As described in detail in this document the site is subject to a “site walk around inspection” during each operational day to ensure that good housekeeping is maintained. Any concerns and remedial actions together with completion targets are recorded in the site diary.
- 13.2 **General Tidiness:** Any litter or other uncontained waste are gathered up and placed in either the designated quarantine area or the appropriate waste disposal skip.
- 13.3 Any spillage is dealt with in accordance with the detailed spillage procedure contained in the Company’s Accident Management Plan.
- 13.4 **Any growth of weeds or vegetation** is eradicated using the appropriate chemicals or by manual removal.
- 13.5 **Site Surfaces** are inspected in line with the monitoring schedule detailed in the Site Working Plan.
- 13.6 **Access Roads** are inspected daily to ensure that any waste or detritus that may have been tracked from the site is removed.
- 13.7 **Fires on Site:** No deliberate burning of waste material will occur at the Facility and all necessary precautions will be undertaken to prevent accidental fires at the Facility. Any fire will be treated as an emergency.
- 13.7.1 There are portable extinguishers present on the site to deal with potential emergencies. A fire extinguisher may be found inside the office. Their position is indicated on the site layout plan drawing ref. A&T/PF/002 contained in the Site Working Plan.
- 13.7.2 The water hose will be used for damping down and cleaning of the impervious areas.
- 13.7.3 All site operatives will be trained on the procedures to deal with emergency situations, and will be required to check the integrity of the hose system on a monthly basis. The condition of the equipment will be logged in the Site Diary.

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13.7.4 In the event of a fire emergency the Fire Authority will be notified and called to attend as necessary.

13.7.5 Any fire incident will be reported in the Site Diary and the Agency will be notified when practicable, but no later than the next day. The system checks following an event will be recorded in the Site Diary.

13.7.6 Residues from such incidents will be contained. When cold, and free from risk of further combustion will be removed from the Facility for authorised disposal elsewhere.

13.7.7 As previously described the proposed activities have minimal potential for environmental nuisance. The drainage system will collect all potentially contaminated surface waters and direct them to the interceptor prior to discharge to the foul sewer. The site drainage plans are illustrated on drawing ref. A&T/PF/003 contained within the Site Working Plan.

13.8 **Potential for Flooding:** There are no surface water features in close proximity to this site and this site has not been affected by flooding.

Residual Risk: The close attention to good housekeeping and sound monitoring protocols should ensure that the operation of this site has a minimal detrimental environmental impact.

Section 14: Record and Information Keeping

14.1 As a minimum the following records will be maintained on site:

- The Site Permit
- The Site Working Plan
- The Company Accident Management Plan
- The Visitor Book
- The Accident Book
- The Site Diary detailing all site inspections and remedial actions in compliance with the requirements of the site Working Plan and Site Permit
- Records of the attendance of the site TCM
- Copies of waste transfer notes and Duty of Care Records
- A daily log of wastes received and transferred off site
- Details of the permit compliance sections of all trading partners
- Quarterly returns to the environment Agency

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- Environment Agency Inspection Records

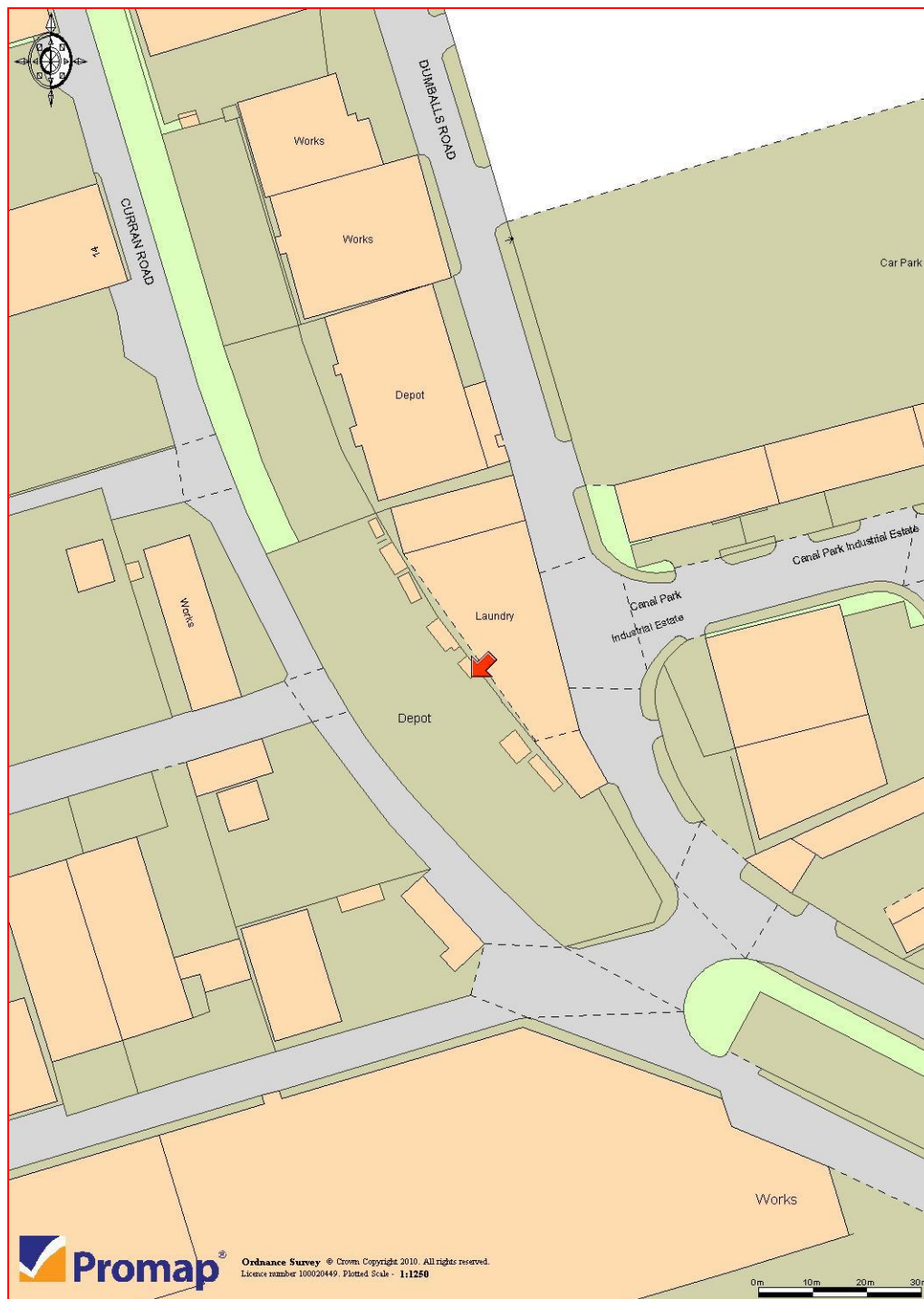
Annex 1

Site Location Plan

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A&T WASTE DISPOSAL SITE LOCATION PLAN

Page 26 of 37

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Annex 2

Adopted Risk Assessment

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IDENTIFICATION OF EVENTS OR FAILURES THAT COULD AFFECT THE ENVIRONMENT

The following activities have been identified as posing a potential risk to Health, Safety and the Environment:

- Loading and Unloading Waste
- Overfilling of Containers
- Plant or Equipment Failure
- Containment Failure
- Fires and failure to contain contaminated run-off
- Disposal to Foul and Surface Water Systems
- Incompatible waste streams
- Unwanted reactions between waste streams
- Emission of unchecked effluent
- Breach in site security
- Vandalism
- Untrained Staff

Solid Wastes which are likely to give rise to significant amounts of dusts, fibres powders or particulates		
<i>Risk phases may include one or more of the following</i>	<i>Hazardous Event and Pathway</i>	<i>Receptors or Targets</i>
<i>Risks of airborne dust, fibres powders or particulates</i>	<i>Release of air, dusts, fibres, powders or particulates either directly from wastes exhibiting these properties or as a result of waste handling procedures on site</i>	<i>People Properties Ecosystems</i>
Simple Generic Risk Assessment		
<i>Wastes exhibiting these properties present the following risks:</i> • Environmental damage as a result of fallout causing smothering effects • Harm to health by inhalation • Damage to property and loss of amenity caused by deposition of particulate <i>These risks are adequately controlled through primary and residual risk management provisions specified in the following fields</i>		
Primary Environmental Risk Management		

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No wastes will be accepted to site containing significant proportions of dust, fibres or particulates

All wastes with the potential to generate some dust, fibres or particulates are stored within enclosed buildings or containers

Residual Environmental Risk Management Provision to Prevent and Minimise Pollution due to Failure of Primary System

The site supervisor will undertake visual monitoring for excessive dust throughout the working day.

Should the site supervisor determine that significant amounts of dust are being generated a water spray will be used to damp down the affected area.

Any waste containing significant dust will be covered or contained in a sealed container.

Wastes that are likely to give rise to harmful or offensive odours

Risk phases may include one or more of the following	Hazardous Event and Pathway	Receptors or Targets
<i>Risk of strong odours in the normal ambient external conditions.</i>	<i>Aerial release of odours which may be offensive or harmful beyond the site boundary</i>	<i>people</i>

Simple Generic Risk Assessment

The site does intentionally take putrescible waste into the facility. However wastes exhibiting these properties such as mixed household waste could present environmental pollution.

These risks are adequately controlled through primary and residual risk management provisions specified in the following fields

Primary Environmental Risk Management

No waste comprising or containing substances with significant odour hazard will be accepted at the facility.

Any putrescible wastes with the potential to cause odour are stored within the quarantined building or suitable sealed containers and are not stored for longer than 48 hours.

Residual Environmental Risk Management Provision to Prevent and Minimise Pollution due to Failure of Primary System

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The site supervisor will undertake daily olfactory monitoring on the site and the site boundary.

Should the supervisor detect an unpleasant odour then the source of this odour will be determined, this will include the potential for external sources of odour not related to the facility.

Should an unpleasant odour be attributed to waste stored at the facility, the waste will be segregated under cover and removed off-site as soon as is practicable.

Light wastes and other wastes which can give rise to significant quantities of litter air and water borne

<i>Risk phases may include one or more of the following</i>	<i>Hazardous Event and Pathway</i>	<i>Receptors or Targets</i>
<i>Risk of wind blown litter</i>	<i>Release of litter via atmosphere beyond the site boundary</i>	<i>People Properties</i>

Simple Generic Risk Assessment

Some waste types contain materials that could give rise to either air or water borne litter. Release of air and water borne litter beyond the site boundary pose possible risks of:

- Damage to property and loss of amenity caused by deposition of litter*

These risks are adequately controlled through primary and residual risk management provisions specified in the following fields

Primary Environmental Risk Management

All waste types are contained within buildings or specified containers or bays that can be covered during periods of high wind.

These bays and containers in periods of high wind.

All vehicles taking waste off site will be sheeted or netted.

Good housekeeping of the site and areas around the site will reduce the amount of litter

Residual Environmental Risk Management Provision to Prevent and Minimise Pollution due to Failure of Primary System

Page 30 of 37

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All site operatives will ensure that good housekeeping reduces the threat of windborne litter.

All collected litter will be place in the appropriate storage area.

Wastes that are likely to produce contaminated or polluting run-off

<i>Risk phases may include one or more of the following</i>	<i>Hazardous Event and Pathway</i>	<i>Receptors or Targets</i>
<i>Risk of the generation of contaminated run-off</i>	<i>Release of contaminated run-off to surface waters and ground water</i>	<i>Ecosystems Surface water features Properties Ground water</i>

Simple Generic Risk Assessment

Solid wastes do not usually present a significant risk of producing contaminated run-off, however other liquid wastes such as oil and paint can pose a threat.

These risks is adequately controlled through primary and residual risk management systems specified in the following fields

Household, commercial and industrial wastes present environmental pollution risks due to the risk of the production of contaminated run-off and spills . these may be adequately controlled through primary and residual risk management systems specified in the following fields

Primary Environmental Risk Management

All wastes are stored on impermeable pavement that is linked to the foul drainage system.

All oil and liquid wastes is stored in labelled sealed drums or tanks.

All oil and liquid wastes are stored in double skinned tanks or are contained within a sealed bund.

Residual Environmental Risk Management Provision to Prevent and Minimise Pollution due to Failure of Primary System

All waste containers used on the site will be checked on a monthly basis as part of the site's planned maintenance programme.

Any leaking containers will be taken out of service and will be drained of liquid waste.

Page 31 of 37

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Any spillages on site will be dealt with via the site spillage protocol and remediation programme

Wastes which are in the form of liquids or sludge

<i>Risk phases may include one or more of the following</i>	<i>Hazardous Event and Pathway</i>	<i>Receptors or Targets</i>
<i>Risk of leaks or spillages of liquid wastes and sludges</i>	<i>Release of contaminated or polluting liquids or sludges to the environment</i>	<i>Ecosystems Surface water Ground water Properties</i>

Simple Generic Risk Assessment

Some household, commercial and industrial wastes are received in liquid form such as paint and oil.

The environmental pollution risks are adequately controlled through primary and residual risk management systems

Primary Environmental Risk Management

Provision of site that is engineered for containment as detailed in the site working plan

Waste reception, validation and storage protocols are employed.

All liquid wastes are stored in suitable sealed tanks or drums

The provision of a flood action plan for the site

All wastes are stored on impermeable non-porous surfaces or within buildings.

Residual Environmental Risk Management Provision to Prevent and Minimise Pollution due to Failure of Primary System

Any spillages on site are dealt with by employing site spillage protocol

Combustible wastes such as wood, paper, plastic which are capable of self-sustained burning in air once ignited

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<i>Risk phases may include one or more of the following</i>	<i>Hazardous Event and Pathway</i>	<i>Receptors or Targets</i>
<i>Risk of deliberate or accidental ignition of waste</i>	<i>Fire leading to direct damage of the site infrastructure, polluted run-off, air borne debris release to the environment</i>	<i>People</i> <i>Property</i> <i>Ecosystems</i> <i>Atmosphere</i> <i>Via fire fighting and the production of contaminated run-off</i> <i>Surface water</i> <i>Ground water</i>

Simple Generic Risk Assessment

Some waste types will comprise or contain combustible fractions. These materials present risks of ignition leading to:

- Loss of amenity or harm to health caused by inhalation of fumes*
- Damage to aquatic systems from contaminated run-off*
- Spread of fire to adjacent buildings*
- Generation of green house gas from burning waste*

These risks are adequately controlled through primary and residual risk management provisions specified in the following fields

Primary Environmental Risk Management

Potentially combustible wastes are permitted only if they are stored in areas of impermeable non-porous surfacing connected to the sealed drainage system

Access to fire fighting equipment is readily available

Any fire occurring within the site boundary will be treated as an emergency and immediate action taken to extinguish it.

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Fire fighting equipment is provided at designate spots identified in the site's fire procedure.

Residual Environmental Risk Management Provision to Prevent and Minimise Pollution due to Failure of Primary System

No waste will be burnt on site.

Smoking is not permitted on site

No naked flames are allowed

Wastes that are likely to attract pests

<i>Risk phases may include one or more of the following</i>	<i>Hazardous Event and Pathway</i>	<i>Receptors or Targets</i>
<i>Risk of attracting pests, resulting in infestation of the site</i>	<i>Pest migration from the site to adjacent property via air, land or underground services</i>	<i>People Properties Ecosystems</i>

Simple Generic Risk Assessment

Some of the waste accepted at the site could comprises or contain materials that will attract vermin.

Similarly some waste can provide breeding sites. These wastes therefore present identifiable risks of

- Causing damage to adjacent ecosystems*
- Transmitting disease*
- Reduction of amenity*

These risks are adequately controlled through primary and residual risk management provisions specified in the following fields

Primary Environmental Risk Management

Putrescible waste is stored for a maximum of 72 hours on site

Baiting systems are employed on site

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Residual Environmental Risk Management Provision to Prevent and Minimise Pollution due to Failure of Primary System

The site is inspected daily for vermin infestation by the site supervisor

A specialist contractor is employed to deal with any infestation at the site

Details of the contractor are kept in the contractors' management file

Waste that are likely to attract scavengers

<i>Risk phases may include one or more of the following</i>	<i>Hazardous Event and Pathway</i>	<i>Receptors or Targets</i>
<i>Risk of attracting scavengers</i>	<i>Deposit of scavenged waste outside the site boundary and presence of large number of birds creating detrimental affect to amenity</i>	<i>People Property Ecosystems</i>

Simple Generic Risk Assessment

Household, commercial and industrial waste may comprise or contain wastes which attract scavengers.

These risks are adequately controlled through primary and residual risk management provisions specified in the following fields

Primary Environmental Risk Management

These waste are stored on site in vermin proofed containers

Stored in a building

Residual Environmental Risk Management Provision to Prevent and Minimise Pollution due to Failure of Primary System

The site is inspected daily for the presence of scavengers by the site supervisor

A specialist contractor will deal with any detected scavenger problems.

Company details are held in the site diary.

Waste or waste operations that are likely to give rise to mud or debris

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<i>Risk phases may include one or more of the following</i>	<i>Hazardous Event and Pathway</i>	<i>Receptors or Targets</i>
		<i>People Property infrastructure</i>
Simple Generic Risk Assessment		
<i>The transfer of wastes may give rise to the deposition of putrescible waste outside the site boundary</i> <i>The site therefore presents risks of</i> • <i>Causing injury by slips or trips to individuals</i> • <i>Damage to vehicles using the highway</i> • <i>Blockage of drainage systems</i> • <i>Reducing the amenity value of affected areas</i> <i>These risks are adequately controlled through primary and residual risk management provisions specified in the following fields</i>		
Primary Environmental Risk Management		
<i>Good housekeeping</i>		
Residual Environmental Risk Management Provision to Prevent and Minimise Pollution due to Failure of Primary System		
<i>The site external yards, storage areas are cleaned by a waste operative. Good housekeeping is employed and the site is inspected on a daily basis by the site supervisor.</i>		
Accidental mixing of incompatible waste streams-		
<i>Risk phases may include one or more of the following</i>	<i>Hazardous Event and Pathway</i>	<i>Receptors or Targets</i>
<i>Risk of mixing incompatible waste streams</i>	<i>Deposit of incompatible waste streams in civic amenity area and other operational areas of the site with detrimental affect to health, welfare and amenity</i>	<i>People Property Ecosystems</i>
Simple Generic Risk Assessment		

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Household, commercial and industrial waste may comprise or contain wastes which are hazardous. These risks are adequately controlled through primary and residual risk management provisions specified in the following fields

Primary Environmental Risk Management

These wastes are stored as segregated wastes only.

If hazardous waste is inadvertently received on site is separately in labelled and dated containers and stored in the quarantine area for disposal to a suitably registered waste facility.

Residual Environmental Risk Management Provision to Prevent and Minimise Pollution due to Failure of Primary System

The hazardous waste containers are logged and checked daily to ensure compliance with waste storage protocol.

The records of monitoring are kept in the site diary.

If incompatible wastes are unintentionally stored together, they are immediately segregated if safe to do so.

The advise of the Environment Agency is sought if required

A specialist contractor will deal with any issues that cannot be managed in-house.