SITE MANAGEMENT SYSTEM
& WORKING PLAN
FOR THE OPERATION OF THE

MATERIALS RECYCLING FACILITY

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Client:		Dyfed Recycling Services	
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	Name		***Date***
Prepared by:	EviResource Consulting		November 2016
Approved by:	D. Davies		TBC
Position:	Director		
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INTRODUCTION

This site Environmental Management System (EMS) has been prepared for the operation of Dyfed Recycling's materials recycling facility (MRF). It should be reviewed and updated for any significant changes in operation, non-compliance, complaint, accident or every 4 years, whichever is the sooner.

It is an important document as it outlines the steps we need to take in our operation of the facility in order to comply with our planning permission, our environmental permit and our own aspirations for improved environmental stewardship.

This plan is produced in accordance with parts 1 & 2 of The Environment Agency Publication *'How To Comply With Your Permit'* and covers all procedural aspects for the correct management of the facility including:-

- **SITE MANAGEMENT & COMPETENCY**
  - Sufficiency of Technically Competent Staffing
  - Training & Delegation
  - Facility Resources Management

- **OPERATING OUR FACILITY**
  - Permitted Activities
  - Receipt and measurement of wastes and recyclables
  - Sorting, separation and segregation into various recyclable products using of mechanical plant and manual sorting techniques
  - Facility housekeeping and maintenance

- **REDUCING OUR ENVIRONMENTAL IMPACT**
  - Assessing Impact Risk
  - Emissions monitoring (surface water management, leachate, mud & debris)
  - Nuisance Monitoring & Complaints Systems (Odour, Dust, Noise, Pests etc.)

- **MANAGING SITE INFORMATION**
  - weighbridge records
  - waste transfer notes (WTN) and Hazardous waste consignment notes
  - site inspection records
  - plant and equipment maintenance records
  - accident and incident records
  - training & competency records
  - external complaints procedures & log
  - site diary & visitors log
  - site design and infrastructure records (including repairs and modifications)

The site is managed from the site office which is located at the entrance to the facility adjacent to the weighbridge. This management system, the Environmental Permit (EPR/DP3098FN – directly associated with the Waste Management Licence EAWML 34255) and Planning Permission documents along with all other relevant records outlined in this system will all be kept securely and will be available to view by appropriate personnel at the site office

AT ALL TIMES.

1. PERMITTED OPERATIONS & COMPETENCY :

1.1. Permitted Operations :

1.1.1. The types of operations performed at the MRF fall under the following EA permitted activities for keeping and treating wastes :-

- Physical treatment via the separation and sorting of wastes (D9),
- Repackaging of wastes prior to off-site transfer via compaction (D14),
- Storage pending any of the operations numbered D 1 to D 14 (D15)
- Recycling/reclamation of metals via separation and recovery (R3)
- Recycling/reclamation of other inorganic materials via separation and recovery. (R4)
- Storage of waste consisting of materials intended for submission to any operation numbered RI to RI2. (RI3).

1.1.2. Wastes will generally be delivered to the MRF via:

- Waste collection authorities
- Commercial/trade Customers
- The Company's own collection vehicles

1.2. Permitted Wastes :

1.2.1. The only waste types that **will** be accepted at the site are listed in Appendix G and as indicated within the EP. Commercial wastes acceptable at the site will be in compliance with the 'Duty of Care' and thus capable of being tracked for any future reference.

1.2.2. No more than 24,999 tonnes of waste will be accepted at this site per annum.

1.2.3. Only wastes that are readily identified, that is, those allowable within the EP will be accepted for processing on site. Suspect materials will be redirected off site if found unacceptable prior to deposit on site and/or segregated pending further identification and dealt with as in Section 4.4 and the procedures detailed in Appendix H

1.2.4. Source segregated materials suitable for recycling and/or reprocessing can be temporarily stored on suitable hard-standing or impermeable pavement areas pending bulking up and off-site transfer.

1.2.5. The height of materials in all external storage areas will be kept below 3m Above surrounding ground level at any time.

1.2.6. Where required site plant will be utilised to move wastes around the facility, generally maintain housekeeping and reduce handling problems. Appropriate site signage will indicate the different materials undergoing processing and/or storage.

1.3. Hours of operation

1.3.1. The MRF may be open between the following periods:-

- **Monday to Friday.** **07.30 hrs. to 18.00 hrs.**
- **Saturday** **07.30 hrs. to 13.00 hrs.**
- **Sunday** **NO OPERATION**

1.4. Site Management & Competency :

1.4.1. Our Environmental Permit (EP) requires us to operate in a fit and proper and technically competent fashion, this means that we have to show with documentary evidence that the financial, safety, environmental, technical and legislative aspects of our industry sector are accounted for and acted upon professionally.

1.4.2. To achieve this, our corporate structure delegates various activities within our management hierarchy; these are detailed in the Organogram in Appendix 19. Operative training is recorded via toolbox talk registers covering our operational procedures (see Appendices C,D,E,H,J,K & N)

1.4.3. However for the purposes of the MRF operation, the day to day running of the site is delegated to the Site Supervisor.

1.4.4. Minimum Staffing & Training Requirements :

1.4.5. To ensure the safe operation of the site, the MRF shall not operate unless there is a minimum of :

1.4.6. Site supervisor / foreman Trained to :

- Operate weighbridge
- Inspect & receive wastes
- Supervise operations
- Carry out site inspections
- Recognise & Manage Incidents
- Secure the site

1.4.7. 2 x Operatives Trained to :

- Operate Site Machinery
- Recognise non-compliant materials
- Understand operational risks

1.4.8. In addition to the minimum staff requirements, the MRF shall not operate unless a Certified Technically Competent Manager (TCM) attends the facility in conjunction with the Environment Agency guidance (e.g. for at least 15 hours per week) to audit the facility, review site activity and assess compliance.

1.4.9. Amendments to the EMS (previously the working plan) resulting from such reviews will be notified in writing to NRW as soon as practicable but at least within seven days.

1.4.10. The TCM cover requirement may be complied with by trained Dyfed Recycling staff or can be contracted out to consultant services, who may also provide holiday/absence cover to ensure year-round TCM continuity.

1.4.11. Appendix 13 records the training requirements and competency achievement of the operational staff at the facility, all staff will have an initial assessment and induction training when they start work at our facility and any gaps in their competency will be filled via internal or external training programmes and recorded.

1.4.12. With regard to machinery operation, all operators or staff likely to be required to operate such machinery (plant etc.) will either have attained an industry standard certification (i.e. CPCS etc.) or have been assessed by an

industry qualified Instructor or in the case of specialist plant (recycling plant etc.) a supplier/manufacturer approved training course for internal certification and record purposes.

1.5. Facility Resources Management :

1.5.1. It is incumbent on us in our role as wastes and resource managers to ensure that our own operations are run in a resource efficient manner. Using this as a basis to run our business not only has the advantage of cost reductions from efficient use of bought in resources but also engenders good practice and should result in a lower likelihood of incidents where potentially polluting or harmful materials must be utilised (fuel oil etc.).

1.5.2. We will strive to recover as much material as possible from our incoming waste streams for recycling and recovery and wherever possible seek closed loop or up cycling opportunities when considering onward re-processing options.

1.5.3. We will try to reduce our carbon footprint via a reduction (wherever practical) in transport fuel by :

1.5.4. using re-processors as close as possible to our facility.

1.5.5. bulking up loads for maximum efficiency

1.5.6. seeking return loads

1.5.7. The hierarchy of wastes management will, be applied appropriate to and prior to landfill which will be the last option for our residual materials, options for further re-processing and recovery or waste to energy will be considered on a case by case basis depending on the nature of such residual materials.

1.5.8. Appendices M & N record the main resources used on site and how we strive to reduce their use, reduce wastage and mitigate impact.

2. SITE ENGINEERING FOR ENVIRONMENTAL CONTROL

2.1. Engineered site containment and drainage

The site drainage is detailed within the site plans/drawings (**Appendix P*).**

2.1.1. These may be presented as: -

- Roof drainage, direct discharge to surface water ditches.
- Waste separation/sorting/transfer building is connected to a leachate holding tank pending off site treatment via vacuum tanker lorry.
- Run-off from external areas are discharged to surface water drainage

2.2. Surface water management

2.2.1. Mixed waste (non inert / non source segregated) recovery, recycling and unloading operations will be performed within the MRF building.

2.2.2. Periodically site operatives will inspect site ditches and drains and arrange for the removal of debris and the cleaning of any traps / interceptors.

2.2.3. Inert and source segregated wastes may be treated on the external hard standing where an assessment has been made by site staff that risks of

pollution are extremely low. Where. any contamination and thus potential pollution may' occur, absorbent materials (stored on site) will be applied in order to reduce the potential for fluids entering the site drainage. The yard drainage can be observed upon the enclosed drawing (**Appendix P*).**

2.2.4. The TCM shall be responsible for carrying out and updating environmental impact risk assessments on the facility and its operations. These risk assessments will be shared with the site staff to ensure risks and mitigation procedures are understood. The assessments will be reviewed in light of any unforeseen impact or incident. The risk assessments & impact reviews forms are given in **Appendices L & M**.

3. SITE INFRASTRUCTURE & ENGINEERING :

3.1.1. The general site layout is indicated upon drawings and plans within **Appendix P**. Those wastes identified upon on these plans will be stored within designated storage areas as indicated.

3.2. Site identity board

3.2.1. An identity board of durable material and finish will be prominently displayed at or near the entrance to the facility and the condition/clarity will be checked daily. This will display the following information:

- Site name and address
- Permit holder name and Operator name
- Permit reference number
- Emergency contacts and telephone numbers
- NRW local and national numbers
- Normal operating periods - days and times.

3.3. Site security :

3.3.1. Site security is maintained due to the normal extended operating times and thus the site is manned for most of the working day.

3.3.2. The following security measures are deemed adequate for the following reasons: -

- Industrial location
- Wire mesh secure fencing of a total height of 2 metres provided along all site boundaries and thus enclosing the licensed area.
- Site access via 2.4 metre high secure gates along all site entrances which will be locked out of normal operating times and in the unlikely event of the site being left unattended.

3.3.3. Daily inspection of both the site fencing and gates will be undertaken and recorded upon the daily site diary/inspection form.

3.3.4. This form will also detail any actions required as a result of this operation. Any damage will be held secure by the end of the working day and any repair/maintenance will be completed within conjunction with the EP requirements.

3.4. Plant and equipment

3.4.1. All plant and equipment will be operated and maintained with due regard to supplier/manufacturer recommendations. Records of service schedules and breakdowns will be maintained on site as will procedures to remedy any unforeseen incidents of which could lead to harm to health, loss of amenity and/or pollution of the environment.

3.4.2. Site plant and equipment will be selected to be fit for purpose and will include, but may be subject to change depending on site operations as,

- A Telehandler Fork lift.
- A 360^0 Excavator with rotating grab
- Generator
- Water Bowser
- Wood Shredder
- Company HGV bulk transport as required
- Various sized containers/skips

3.4.3. Arrangements will be provided for the storage/maintenance of plant and equipment used in accordance with manufacturers/suppliers recommendations

3.5. Lighting

3.5.1. Permanent site lighting will be provided supported by the use of lighting units/towers and/or site plant as and when required. These are powered via a generator.

3.6. Waste storage

3.6.1. There are various areas and containers available to adequately store waste materials prior to them being transferred off site (see **Appendix P***). This would include materials being temporarily held within: -

- A number of designated/signed skips and/or bays
- Various wastes stored pending off site transfer

3.6.2. It is envisaged that the maximum quantity of waste to be held on site at any time would be in compliance with the EP, excluding bulk recyclable materials

3.6.3. Typical materials held will consist of bottles, metals, paper, cardboard and electrical goods.

3.6.4. Waste exempt areas will be registered as indicated upon the plan and will be in compliance with sections of the EP. The types and location of exempt materials will be indicated within **Appendix R** to this plan.

3.6.5. A list of all the materials registered as exempt, their European Waste Catalogue (EWC) codes and the location of the storage container on the site plan are included within **Appendix Q**.

4. OPERATING THE FACILITY :

4.1. Control of mud and debris

4.1.1. Due to the whole site being made up of hard standing and a long off highway access road mud etc. is not envisaged to be a problem.

4.1.2. However remedial measures will take the form of manual removal of any mud/debris deposited upon the highway and/or hire of road cleaning/brushing equipment depending upon the level of debris present and any difficulties for in its removal. Site equipment will include wide brushes, shovels and hose/washing equipment.

4.1.3. The road and internal hard standing/impermeable pavements will be inspected, by site personnel, and the condition of such recorded at the end of the working day.

4.2. Potentially polluting leaks and spillages

4.2.1. Site plant and. equipment will be checked daily by competent operatives and regularly maintained in line with the suppliers /manufacturers specification/service schedule and thus the potential for pollution will be minimised. In the event of leaks absorbent granules/booms, stored on-site, will be used to contain any leaks and then removed from site.

4.2.2. All incidents will be recorded within the site diary noting the cause and the remedial actions taken. A review to implement preventive action will also be performed.

4.2.3. Control and remediation of leaks and spillages should be of a low order due to the limited nature of the wastes normally accepted at the site. Thus, there is only a small potential for polluting leaks and spillages from wastes and waste containers being released.

4.2.4. All containers used to store wastes will be checked for their integrity and to ensure any potential contaminated fluids formed will be contained.

4.2.5. Open storage areas will be regularly inspected for potentially contaminated fluids and the necessary action taken to contain and to arrange correct disposal as appropriate.

4.2.6. Where required, based upon weather conditions and/or extended storage e.g. overnight, waste containers will be covered pending off site disposal.

4.2.7. The operation will be supervised on a full time basis by the plant operatives where vigilance is expected of them.

4.2.8. The segregation and transfer operation will in the main be performed under cover and upon the impermeable surfaces e.g. glass bottles as per the site plan.

4.2.9. Sufficient absorbent materials e.g. sand and booms will be available to reduce the potential for any spillage of contaminating fluids to enter the drainage unless authorised to do so.

4.2.10. Any vessels containing fluids will be removed from the waste deposits and stored in a safe manner pending identification and removal off site.

4.3. Fires on site

4.3.1. No waste materials are to be burned on the site and in the event of an unplanned fire outbreak the emergency plan (see **Appendix C**) will be implemented.

- Fire fighting equipment will include: -
- Fire extinguishers
- Water bowser
- Sand/inert material.

4.3.2. The emergency services where appropriate and the NRW will be informed in the event of a fire or spillage particularly where there is a potential of an environmental concern.

4.4. Waste acceptance procedure

4.4.1. The reception of wastes will be via the current recognised site access points and in compliance with the environmental permit. Separate entrances and exits will be used for public and commercial vehicles and are indicated upon the plan/drawing (**Appendix P***).

4.4.2. Sorting and Separation Treatment at the Facility :

4.4.2.1. Our MRF operates a simple manual sorting system using heavy machinery to effect initial separation of bulky items and the on-facility loading, bulking and movement of recyclates.

4.4.2.2. The processing of mixed waste materials is done within the building to minimise amenity impact and to ensure that any fluids generated by the waste mass are contained and captured by our sealed drainage systems.

4.4.2.3. Mixed waste materials are placed onto the concrete floor of the building, bulk separation occurs with the excavator and then the remainder is sorted through by hand by experienced operatives. The segregated materials are then containerised and bulked up pending off site transfer to re-processors etc. using the telehandler.

4.4.2.4. Source segregated clean materials may be directly bulked up in external storage areas.

4.4.2.5. Incoming wastes will be subject to cursory inspection by site personnel who will be made aware of those materials acceptable and to those of which require redirection off site. Records of waste receipt and off site transfer will be recorded as outlined in Section 4. Wastes received on site, which on visual examination appear suspect, will be quarantined. Where necessary these will be sampled, under controlled conditions by a competent person, where further testing/analysis will be performed. On receipt of the results the outcome of the waste acceptance/rejection will be determined. Suspect waste materials, found in the waste mass i.e. those not matching description and quantity, will be segregated and stored within a sealed/secure quarantine skip, clearly indicated, of appropriate size and type, located upon the impermeable pavement area (see plan/drawing in **Appendix P**). It is envisaged that seven days would be a sufficient period to arrange the best practical environmental option for the waste disposal. NRW will be made aware of suspect materials pending further investigation and appropriate corrective/preventive action. Rejected wastes will be recorded within the site diary/site inspection forms. These wastes will be isolated from acceptable materials and off site disposal arranged as soon as practicable.: Remedial measures will be taken in order to reduce the potential for recurrence.

Materials for off site transfer/disposal will be made as soon as arrangements can be finalised and this will be performed within the following timescales as indicated within the EP.

4.5. Waste dispatch off site

4.5.1. All wastes dispatched off site will be in compliance with the 'duty of care' requirements.

4.5.2. These wastes will then be weighed out and a record of the weight taken.

4.6. Records of Waste Movement

4.6.1. All wastes entering and leaving site will be recorded and relevant information retrieved from the 'Duty of Care' records.

4.6.2. These will include, where appropriate, period contract notes, transfer notes and weighbridge ticket transaction records.

4.7. Means of measurement

4.7.1. The on-site weighbridge will be used to record waste inputs and outputs as required and particularly for commercial reasons. This weighbridge will be operated and maintained in compliance with the _ requirements of Trading Standardisation. If the weighbridge becomes unavailable, then the weight of received waste will be assessed, by utilising the conversion factors developed by the. EA. The weight of despatched waste will be retrieved from the waste disposal or receiving site or again assessed from conversion factors.

5. POLLUTION CONTROL, MONITORING AND REPORTING :

5.1. Surface water monitoring and reporting

5.1.1. There may be a small potential for surface water contamination due to run off from the prepared hard standing/impermeable pavement areas and thus contamination/pollution will be kept to an absolute minimum. Control measures are in place to minimise any environmental impact from possible contamination
from spillage and/or seepage from vehicles etc.

5.1.2. In addition sand and absorbent booms (held within the covered building) and/or similar materials will be available to remedy any potential for polluting materials entering the surface water drainage.

5.1.3. Monitoring of meteorological conditions - a record of general weather conditions shall be kept on a daily basis.

6. AMENITY MANAGEMENT AND MONITORING :

Operations within the building will be performed, where practical to do so, with the doors closed. This will reduce the potential for environmental problems such as wind blow litter.

6.1. Control of dusts, fibres and particulates

6.1.1. Airborne material will be controlled by the use of dust suppression via a mist/spray connected to a hose pipe supply.

6.1.2. Where appropriate sweeping of roads and storage areas will be performed by the use of brushes.

6.1.3. Nevertheless the likelihood of this occurring is low due to: -

- Wastes types i.e. low quantities of dusty type wastes
- Waste discharge within an enclosed building
- Natural ventilation

6.1.4. Due to the presence of site operatives during the operation of the facility visual monitoring will be performed throughout the working day.

6.1.5. Records of such will be recorded within the site diary/inspection form.

6.1.6. In addition this location is distant from domestic properties and thus there is a low potential to cause any environmental or health hazard.

6.2. Control of odour

6.2.1. Due to the type of facility and the types of wastes allowable under the Permit there is very low potential for odour.

6.2.2. Where it has been determined that malodorous wastes are present these will be recovered from the other waste types and removed as soon as possible from site but no later than at the end of the working day.

6.2.3. In the event that odour-generating wastes are received the following action will be taken: -

- The prevention of odorous waste being accepted in future loads
- The rejection of such wastes depending upon the severity of the odour
- Off-site transfer as soon as practicable taking account of the 'Duty of Care' requirements, odour determination where practicable and acceptance arranged at an alternative waste management facility.

6.2.4. Where odours are perceived, site operatives will respond to complaints using the appropriate reporting systems (**Appendix***) and alert site management of the event.

6.2.5. A record of odour detection will be kept in the site diary/ inspection form.

6.3. Control and monitoring of Noise

6.3.1. Due to the primary operations being performed within an enclosed building it is not thought noise levels will be a problem.

6.3.2. In addition the building is also fitted with roller shutter doors and these will assist to suppress noise levels while working within the building.

6.3.3. Any mobile plant employed will be operated to the required standard and in line with the EP and regulated by the EA and may also be regulated by the local Environmental Health Department as appropriate.

6.3.4. The following will also be given attention,

6.3.5. Plant will be fitted with appropriate silencing equipment, as per manufacturer's recommendations and will be maintained and repaired accordingly.

6.3.6. Where there is any doubt over the integrity of such plant, and/or excess noise is brought to the attention of the operators by the Regulatory Authority, then levels will be determined in line with current practice and relative standards applied to such activities. The noise assessment/levels will need to be determined by a competent person.

6.3.7. Where it is necessary for recyclates/wastes to be handled outside of the building then this will be of short duration with due consideration given to any environmental noise being generated i.e. transfer and not processing of materials.

6.4. Control of Pests

6.4.1. Constant vigilance will be exercised to the operation of the MRF in order to determine pest activity and a record of such observations will be recorded within the site diary/inspection form.

6.4.2. As no putrescible waste types are normally received at this site then the potential for pest activity will be minimal.

6.4.3. Remedial measures will be taken for the control of pests and where necessary by employing the services of a recognised pest control organisation, i.e. the use of dusting/spraying for flies etc. and poisons for vermin. This will be recorded on site and the following visual monitoring for pests, vermin etc. will be performed: ~

- Evidence of droppings
- Evidence of damage to property/plant
- Evidence of ground disturbance e.g. nests
- Excessive infestation present.

6.5. Control of litter

6.5.1. The MRF operations are contained within the waste discharge building and thus the potential for wind-blown litter is negligible.

6.5.2. Enclosed containers will be employed to store paper and cardboard pending off site transfer although there is a small potential for litter with improper use of the bring site but this will be monitored by site operators.

6.5.3. Nevertheless in the event of wind-blown litter being generated the following control measures can be instigated, on the direction of the Technically Competent Manager,

6.5.4. Cessation of operations pending satisfactory weather conditions being re-established,

6.5.5. Site operatives to be redirected from normal work activities to litter picking duties.

6.6. Control of birds and other scavengers

6.6.1. As outlined above the presence of pests will be limited due to the nature of wastes accepted at this facility and the covered operation. In addition due to constant use and movement of site plant during operational hours this will deter the number of birds and scavengers likely to be present.

7. SECURITY AND AVAILABILITY OF RECORDS

7.1.1. All records pertinent to the operation of the site will be securely stored and protected from adverse conditions.

7.1.2. These will include the Permit, Written Management System, support documents and the site diary/risk assessment & inspection forms.

7.1.3. The site office is principally manned during the working day and records will be within a safe secure environment.

7.1.4. Transactions performed at the weighbridge may include:

- Period contract notes
- Transfer notes
- Weighbridge dockets/tickets
- Site diary/inspection forms
- Corrective/preventive action forms
- Rejection notices

7.1.5. Storage of such information will be controlled by management and will be available for inspection on request.

7.2. Site diary

7.2.1. A site diary (**Appendix B**) will be kept in the site office and will record a brief description of the daily activity, in particular identifying any abnormal operations/situations may which arise and recording and any necessary action taken. The diary will be used in conjunction with, and as an aide memoir to, the appropriate procedural forms specified and appended in this document. The diary will be kept, by the site supervisor or nominated site operator and will normally be completed at the end of each working day.

7.3. Periodic reporting

7.3.1. A quarterly site return (**Appendix I**) will .be submitted to NRW in a form to comply with their requirements. A copy of the waste classification will be held on site for reference.

A DAILY SITE INSPECTIONS

B SITE DIARY

C EMERGENCY PROCEDURES

D SITE MAINTENANCE

E MOBILE PLANT MAINTENANCE.

F HANDLING CEMENT/ASBESTOS WASTE.

G PERMITTED WASTES

HI WASTE ACCEPTANCE - REJECTION
NRW WASTE RETURNS

JK SITE SAFETY AND INDUCTION
OPERATIONAL PROCEDURES

L GENECIC RISK ASSESSMENT.

M ENVIRONMENTAL IMPACT

N OPERATIONAL PROCEDURES

O SECURITY OF RECORDS

PQ SITE PLANS.

R

S

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UV

W

X-Z