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WML working plan ammendments.

Mekatek Limited

Amex Park,
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Johnstown,
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SA31 3NF

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WORKING PLAN
APPROVED DOCUMENT
LICENCE NO EAWML36045
DATED 10/11/2006
SIGNED S. Wa.

30th October 2006

Our reference: Your letter dated the 28th September 2006 reference amendments to the working plan

Dear Kate

In response to your letter dated the 28th September 2006 regarding working plan amendments, please find enclosed the following response.

I respond to your specific queries as follows:

1) Shredder

a) Nominally empty containers

I agree with your point that once decontaminated the containers are reclassified as 15 01 02, only non hazardous containers will be shredded.

Please find details of the drum washing operations in the amended working plan as attached

All drums for shredding have contained non hazardous water based substances therefore no harmful residues are released, please find revised risk assessment as enclosed.

b) Oil contaminated rags

We will not be proceeding with the bioremediation of the oily rags, the rags will be disposed of at a suitably licensed facility.

c) Plastic shells of computer monitors and television cases

Please see revised flow chart enclosed

2) Crushing of fluorescent tubes and lamps

Please see revised flow chart enclosed, Please find details of the storage area for tubes and the location of the shredder in the amended working plan as attached.

3) Bioremediation trial of oily rags and oily sludge

We will not be proceeding with the bioremediation of the oily rags, the rags will be disposed of at a suitably licensed facility.

We would like to implement the revised working plan with immediate effect.

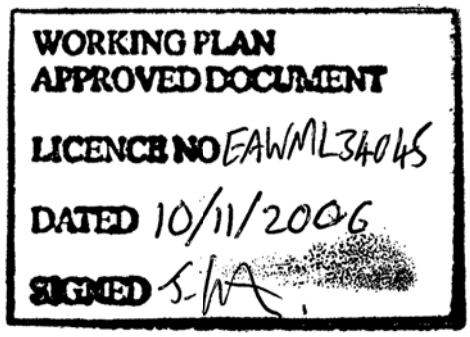
I trust that this information clarifies the points raised in your letter.

Yours sincerely

Rachel White
Compliance Officer

Operating statement for the operation of Non IPPC regulated facilities at TP/1 at Mekatek Limited, Amex Park, Llanstephan Road, Johnstown, Carmarthen SA31 3NF

STATEMENT INDEX



1.0 INFRASTRUCTURE

1.1 Location.

Amex Park is a property situated approximately 2 miles south east of Carmarthen town centre, backing on to the River Towy immediately to the south of the Bascule railway bridge. The whole of the site has the benefit of a Waste Management License reference EAWML 34045

To the South of the property is a redundant cheese packing plant, a home for the elderly and a school and leisure centre. To the north and east are open areas.

1.2 Site Access.

Access to the site is achieved by taking the Llanstephan road from the main A40 (A48) link road. The site is located alongside the redundant St. Ivel cheese packing plant and access is via the northern most gates alongside the pedestrian railway crossing.

1.3 Internal Roads.

The internal access road runs alongside the main `125' Intercity railway line to the north of the site, turning south into site for access to the various operating areas.

The roadway is of reinforced concrete construction as far as the intermediate access to the soluble oil treatment building; from here it is of tarmac construction. The exit from the rear of the biological treatment works is of tarmac construction other than the rising area alongside the north west corner of the works, which is of reinforced concrete construction.

1.4 Car parking.

Car parking is available at the front of the site in the vicinity of the main company office or to the rear of the site around the free oil separation area. All parking for authorised persons are free of charge at all times. Car parking is available for a minimum of 20 cars at all times.

1.5 Lorry Parking.

Lorries are allowed to park only to the rear of the site in conjunction with the car parking detailed above. Parking space is available for up to 6 vehicles (in addition to any that might be discharging) at any one time.

1.6 Site Services.

The service point entries for mains electrical power and water supply are clearly marked on Plan No. 1.

The following services are available for use by site personnel:

Male and female toilets and washing facilities. These are located within the main office building Also in the old A2 reprographics building and the VCC building.

Hot water facilities for refreshment purposes are available either within the transfer station mess room, the WEEE breakdown area mess room, or within the main office building, as are changing facilities.

1.7 Vehicular control.

Directional notices are exhibited routing traffic from the Amex Park entrance to both the main office and each of the operating areas within the site.

The working areas of the site are all located within a secure perimeter fence. The main gates are locked whenever the site is not operational or manned.

All non company drivers are required to report to reception on arrival from where they are routed to their loading / offloading area. A responsible member of staff is alerted to their presence and directed to attend before loading / offloading can proceed.

1.8 Drainage.

Rainwater drainage is by existing site services directly to the main reception tank at the Biological treatment works (please see attached plan no.2).

There is a general fall in the surfaces within the site from south to north and from west to east. The fall from west to east is approximately 1 in 80. These falls result in all foul and surface water naturally being directed to the biological treatment plant.

1.9 Sewerage.

All foul sewerage is drained by existing site services directly to the main reception tank at the Biological treatment works (please see attached plan no.3).

1.10 Site notices.

Directional notices are exhibited routing traffic from the Amex Park entrance to each of the main storage and operating areas within the site.

Appropriate hazard warning, fire safety and general safety signs will be exhibited throughout the site in the relevant areas.

1.11 Security.

The licensed site is completely enclosed within a security fence. Vehicular access to the site is only possible via the main gates adjacent the railway line and marked 1 on the main site plan reference Appendix 1. There is an additional lockable pedestrian access gate into the covered way,. This access point is marked 2 on the same site plan. Vehicular access is achievable to the transfer station laydown area by means of double lockable gates marked 3 on the main site plan referenced Appendix 1.

The site is also protected by remote CCTV and by webcam services.

2.0 WASTE TYPES AND QUANTITIES

2.1 Types of waste.

Permitted wastes.

The waste management licence covers the acceptance of all types of non hazardous packaged waste for treatment or transfer, and all hazardous waste for recycling, in accordance with the wastes permitted for acceptance under Waste Management Licence reference WML 34045.

2.2 Storage volumes.

Licensed Facility and Laydown areas

There are no specific limits to the amounts of non hazardous waste that can be stored prior to despatch for disposal, recovery or further treatment.

3.0 OPERATING AREAS

3.1 Description of reception and off loading areas.

Reception areas

Materials are of loaded in one of three areas depending on the size of the vehicle and the nature of the material.

1) Smaller vehicles containing packaged materials or electrical items are directed to the transfer station / electrical goods reception areas where they are off loaded manually or by Fork Lift Truck marked as Offloading Area 1 on the site plan reference Appendix 1.
2) Larger vehicles containing packaged materials or electrical items are directed to the offloading area alongside the soluble oil treatment building where they are off loaded by Fork Lift Truck referenced as Offloading Area 2 on the site plan reference Appendix 1.
3) Vehicles containing recyclate or electrical items can also be off loaded within the recyclate laydown area to the rear of the soluble oil treatment building marked as Offloading Area 3 on the site plan reference Appendix 1.

3.2 Description of storage and sorting areas

1) Packaged materials are transferred into the transfer station where they are dealt with in accordance with Appendix 10 (transfer station operating procedures) marked as Unit I on the site plan reference Appendix 1.

2) Small electrical items are taken either into one of the pre segregation buildings where they are sorted into type before being taken to the WEEE breakdown room, or they are taken directly into the WEEE breakdown room prior to being dismantled reference Unit E.
3) Recyclate materials are stored in suitable laydown / storage areas prior to further transfer or treatment as necessary.
4) Packaged goods for de packing are either transferred for storage in a suitable location prior to being de packed, or are taken directly to a suitable location for de packing.

Suitable storage areas are identified on the plan marked Appendix 1 which is attached to the working plan.

4.0 WORKING PLAN (PLANT AND EQUIPMENT)

4.1 List of plant and equipment employed and generic operating statement.

a) Shredder
Purpose built industrial shredder. The unit is manually loaded and shredded materials are discharged via a conveyor belt system. The machine is used to process empty clean waste containers, non hazardous contaminated material for size reduction prior to disposal, and other waste plastic. The shredder is to be located within the transfer station building reference I on the attached plan. Once shredded, material is bagged or otherwise packaged and stored prior to being granulated or prior to being despatched for recycling or for disposal.

b) Granulator.

Purpose built industrial granulator/s. Waste plastic that requires to be granulated into small particle size to aid recycling is conveyor or manually fed into a granulator. The granulator "cuts" the feed material into small pieces which are then transferred by means of a closed extraction system into a bulk bag / other suitable container for storage prior to despatch for recycling. Granulators are to be located within the further processing building reference F2 on the attached plan. Once granulated and suitably packaged, material is stored pending despatch for recycling.

c) Screw compactor
Purpose built screw compactor with solid/liquid separation capabilities. Specifically for the de packing of liquid items and the compaction of contaminated compactable packaging. Materials are manually loaded into a reception chamber within which a screw mechanism pushes them into a restrictive orifice. Once a "plug" has been created within this orifice the materials compact against themselves, and, with the use of specialist tearing and roughing capabilities, lose their product memory to the extent that they are then forced out of the restrictive orifice in a dense block. Any liquid contents are squeezed out within the compaction chamber and through a number of liquid outlets within the side wall. These are collected and stored for despatch as animal feed, or for further treatment. Wherever possible compacted packaging is despatched for recycling.
The screw compactor is located within the transfer station building referenced as Unit I (please see appendix 10).

d) Crusher for fluorescent tubes and lamps

Purpose built lamp and tube crusher from Balcan Engineering. Lamps are fed through the loading gate up the chute from where they slip back into the crusher chamber. The position of this chamber ensures that it is impossible for hands or fingers to enter it. The lamps and tubes are crushed into 205 litre drums. The crusher is used in conjunction with a dry activated carbon filter extraction kit for the removal of any pollutants from exhausted gases created during the crushing exercise, this allows the lamps to be crushed dry and the residue sent to Balcan Lamp Recycling for recycling. The crusher is to be located within Unit F3 on the attached site plan Lamps are stored in impact resistant containers prior to crushing. The 205 litre drums of crushed residues are transferred to the transfer station laydown area awaiting transportation to Balcan Lamp Recycling.

e) Hydraulic baler

Purpose built hydraulic baler for light iron and non ferrous materials. The baler is suitable for baling bulky light iron items (such as dry cleaned tins and small electrical goods and components) to render them suitable for recycling as scrap. The baler is located within the further processing building reference F3 on the attached plan. Materials for baling are transferred to this building where they are manually loaded into the baler for compaction. Baled materials are suitably stored in the area adjacent F3 pending despatch for recycling.

e) Flocculation / mixing vessel.

Purpose made mixing bowl with mechanical agitator / stirrer. Aqueous effluent that can be further treated to make it partially or wholly suitable for treatment by the biological treatment plant is pumped or poured into the mixing vessel along with other compatible materials and / or treatment reagents. These are thoroughly mixed and either transferred for further treatment or are pumped into suitable de watering equipment for solid / liquid or liquid / liquid separation prior to further treatment and / or disposal.

4.2 Working Procedures

a) Transfer Facility and Laydown area

Refer to Appendix 10 for all WML transfer station activites.

Decontamination of containers

Containers are cleaned and rinsed over a sump inside the transfer station, the contents of the sump are then pumped into an IBC and transferred to the relevant area of the site for disposal i.e biodegradable residues to the high strength biodegradable effluent area and oily residues to the soluble oil bay. Only containers that have contained the same or compatible substances will be rinsed in the same batch.

b) Shredding / granulation.

Materials which are suitable for shredding /granulation are loaded into the shredder / granulator hopper for shredding / granulation. Once it has been shredded / granulated, material passes onto a conveyor belt, or into an air transfer system, and is transferred into a suitable container for storage prior to being transferred for further treatment, disposal or recycling.

Waste types to be shredded / granulation.
Nominally empty plastic containers (will be fully drained and decontaminated before shredding)
EWC Codes – 15 01 02
Nominally empty plastic containers contaminated with dried water based product residues.
EWC Code – 15 01 02
Components removed from discarded electrical equipment.
EWC Code – 16 02 16
Plastics
EWC Code – 20 01 39

Storage Areas
Materials that are suitable for and are awaiting shredding will be stored within the transfer station building, within the WEEE facility or tidily elsewhere within the licensed site.

c) Baler (steel)
Purpose built hydraulic baler designed to bale light iron and non ferrous metals into a compact block suitable for smelting. This equipment is used to densify light iron casings and tubing (handles etc), small items of electrical equipment, and lightly contaminated steel packaging etc to make them viable for recovery as scrap. There are also options to bale non ferrous metals as and if the need arises. Material is manually loaded into the baler which is then semi automatic in operation. When the bale is formed, a locking lever is activated and the compression ram withdrawn. The bale is then tipped out of the baling chamber and is stacked for storage pending delivery or collection for recycling.

d) Baler (card, plastic, circuit board, wire etc)
Standard "vertical" type wire or cord tie baler/s designed for cardboard, plastic and other low density items. Baler/s can be located in any suitable location where material will benefit from compaction. Baling materials such as cardboard and plastic (from product de packing activities) as well as printed circuit boards from electrical goods and possibly even wire increases the tonnage that can be transported on a vehicle and therefore increases the value when compared to non baled items. Baled materials are stacked for storage pending delivery or collection for recycling.

e) Screw compactor.
Purpose built screw compactor with solid/liquid separation capabilities. Material for de packing or compaction is manually loaded into a reception hopper from which liquid is discharged directly into a ground level reception tank from where it is pumped to a storage vessel awaiting delivery, collection or transfer. Compacted residues are discharged directly into a large tipping skip prior to being deposited in a larger vessel for onward disposal or recycling .

f) Electrical product breakdown, de packaging and further segregation facilities.

These operations are carried out primarily in the building referenced Unit E where a low speed conveyor system has been installed alongside a number of extended workbenches (but can also be carried out in other suitable buildings within the licensed facility). Individual workstations have been fitted out with a range of pneumatic or manually operated hand tools suitable for dismantling a wide range of electrical and other items. Predominantly electrical items are manually dismantled and the assorted components and other recyclate materials are segregated prior to storage pending delivery or collection for recycling. Other goods received for de packing or further segregation are removed from their packaging and /or segregated and stored pending delivery or collection for recycling or disposal.

g) Crusher for fluorescent tubes and lamps

Fluorescent tubes and lamps for shredding will be counted on receipt and then stored on site awaiting crushing. All lamps and bulbs will be stored in impact resistant containers to minimise the potential for breakage prior to crushing.
Lamps and tubes will be inserted into the crusher in accordance with the manufacturers instructions and crushed product will be stored in sealed drums pending delivery to Balcan Lamp Recycling for recycling. When the activated carbon air filter is exhausted this will be regenerated if possible or disposed of as hazardous waste, and a new filter installed.

Waste types to crush
Fluorescent tubes and lamps 20 01 21*

Volume of material crushed
Maximum 3 tonnes per day

4.3 Equipment breakdown procedure.

In the event of a breakdown in other equipment on site, we typically carry certain spares and conduct repairs in house. Alternatively we may choose to call in our suppliers or other external engineers.

5.0 WORKING PLAN (OPERATIONAL PROCEDURES)

5.1 Inspection, validation and acceptance of incoming loads.

All security gates are locked unless a competent member of staff is within the facility. Should the gates be locked, tanker drivers must report to the main company office where the receptionist will contact a member of the works staff to unlock the facility and inspect the load being delivered.

All incoming deliveries are accompanied by a relevant delivery, duty of care or hazardous waste Consignment note.

WASTE ACCEPTANCE PROCEDURES

(i) New Wastes – Transfer Station

Waste transfer station
For wastes acceptance procedures for the waste transfer station please refer instead to Appendix 10 and form MS1B in Appendix 4.

Only those waste streams and types permitted by the waste management licence shall be treated.

(ii) WEEE Facility

All customers wishing to deliver waste to the WEEE facility will be allocated a unique MK number from the internal Microsoft Access system.

For every separate load that is to be delivered or collected a WE Reference booking number will be allocated f.e WE0450, this number and the relevant MK Number must be marked on all paperwork accompanying the load.

Details of the Producer Details, Date of Delivery, description, number of items, weight, EWC code and Hazard Codes (for hazardous waste such as funnel glass and cathode ray tubes) where applicable will be entered onto a WEEE Facility Spreadsheet for record keeping purposes.

5.2 Rejected loads.

Please see Appendix 10 for further details.

5.3 General cleaning procedures.

All areas of the site are routinely cleaned on a daily basis. Any accidental spillage is cleaned using chemical absorbents and/or oil absorbent material depending on the nature of the spillage. External areas are routinely swept with an industrial sweeping brush with all debris being deposited to skip for disposal

5.4 Opening hours

The transfer station is to be open for the **general** acceptance of waste as follows:

Monday – Friday: 8.30am to 4.30pm
Saturday - By prior arrangement
But not so as to preclude our own (or directly sub contracted) vehicles being allowed to deliver materials into or collect materials from the facility at other times provided the site is suitably staffed to receive or despatch materials in accordance with company rules.

6.0 WORKING PLAN (WASTE TREATMENT PROCEDURES)

6.1 Waste transfer facility

Please refer to Appendix 10

7.0 HEALTH AND SAFETY PROCEDURES

7.1 Fire fighting equipment.

All standard precautions are taken to prevent the outbreak of fire within the site. In the unlikely event of fire, suitable fire fighting equipment is located within the main company office building, workshops and laboratory, together with all operating areas (as detailed below).

All staff are fully conversant with the locations of fire fighting equipment and the methods of handling a fire (if safe to do so). Telephones with Emergency service dial facilities are available at the main plant pump house, the office area in the soluble oil treatment building, and the main office reception area at the entrance to the facility. All members of the management team and area supervisors are provided with mobile phones which they can use in an emergency.

Fire fighting equipment available in the operating areas consists of the following (together with fire blankets where appropriate).

2 No. dry powder extinguishers in the Transfer Station
1 No. carbon dioxide extinguisher in the WEEE Facility

7.2 First Aid.

First aid equipment is located in the main pump house, soluble oil treatment building, laboratory, workshops, and main company office building at the front of the site. First aid training is available to all members of staff. Eye wash stations are available at appropriate locations.

7.3 Safety Precautions For Visitors.

Visitors will be provided with P.P.E, and asked to log in and out from site.

Visitors are not allowed to be unsupervised on the site. First aid facilities are provided as detailed in section 7.2 above.

All visitors to the site, including H.S.E. and Environment Agency representatives, will be required to observe the site safety rules and regulations. Appropriate risk assessments have been implemented to safeguard all such visitors.

8.0 ENVIRONMENTAL CONTROLS

8.1 Odour control.

Problems are not experienced with noise, dust, grit or odours in the normal course of events due to the nature of the wastes being received and treated and the equipment used to treat them, however, odour control response products and equipment is available should the need arise to use them.

8.2 Vermin.

The total site will at all times be the subject of a pest control contract for the exclusion of rats, mice and other pests.

8.3 Spillage.

In the event of a spillage occurring outside any of the bunded areas this will immediately be dealt with by means of absorbent materials (in the form of booms, pads, clay granules, sand, etc.) depending on the size and nature of the spill. A wide range of these materials is held on site as a precaution against any such incident. Emergency spillage kits containing chemical absorbents or oil absorbents (whichever is appropriate) are stored at the main laboratory, soluble oil treatment area, and designated drum containment areas. Pumping units are available to "suck up" any contained spillage.

8.4 General cleanliness.

The site is maintained in a clean and orderly fashion. Regular sweeping of hard standing areas is undertaken along with steam cleaning of operational areas coming into contact with oils and dirt. Grassed areas of the site are regularly mown and bare areas weeded and litter picked.

9.0 RECORD KEEPING

9.1 Receipt documentation.

All loads received for treatment are accompanied by either a Duty of Care document or a Hazardous Waste Consignment Note in accordance with current legislation. A copy of each such notice is retained by Mekatek Limited.

A log is maintained of all incoming loads (please see Appendix 10).

9.2 Disposal documentation.

All wastes leaving the site are documented by means of the relevant Duty of Care or Hazardous Waste Consignment Note in accordance with current legislation. A copy of all disposal documentation is retained by Mekatek Limited.

9.3 Documentation available for inspection.

All receipt and disposal documentation is retained at the company's offices for a period of 24 months from the date of completion where it is available for inspection by any AUTHORISED inspector.

10.0 STAFFING ARRANGEMENTS

10.1 Staff structure.

The staff structure is made up as follows:

Managing Director	Mr P N Mellor
Site Manager and COTC holder	Mr G Matthews
Assistant Site Manager and COTC holder	Mr D Lewis
Transfer Station and WEEE facility manager	Ty Helm
Additional COTC holder	Mr D Matthews

Overall responsibility for the operation of the site rests with the Site Manager.

The head operator of each of the main working areas is responsible for the day to day operation of their own area, with a requirement to assist on other areas of the site if necessary.

Other staff may work towards gaining a COTC qualification (as appropriate).

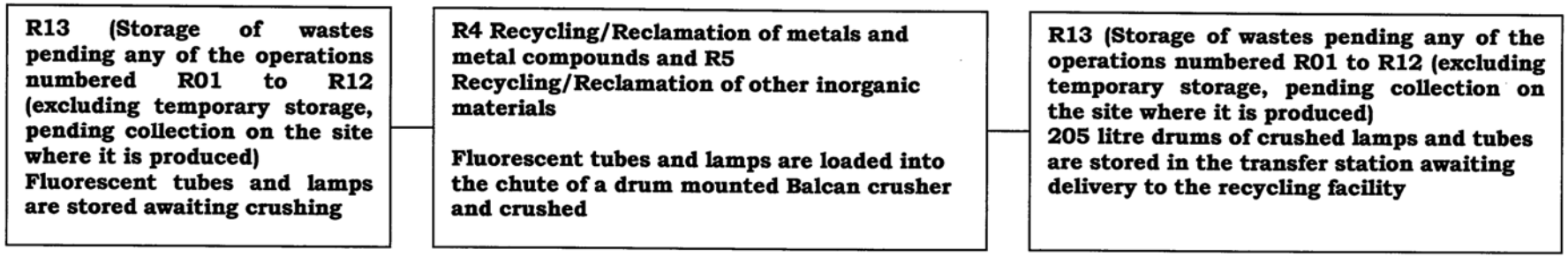
Cover for illness and vacation is provided by a combination of existing staff and external COTC holders (as necessary).

A core team of approximately 15 operatives is employed on a full time basis. Additional manual or specialist assistance is hired in as and when required.

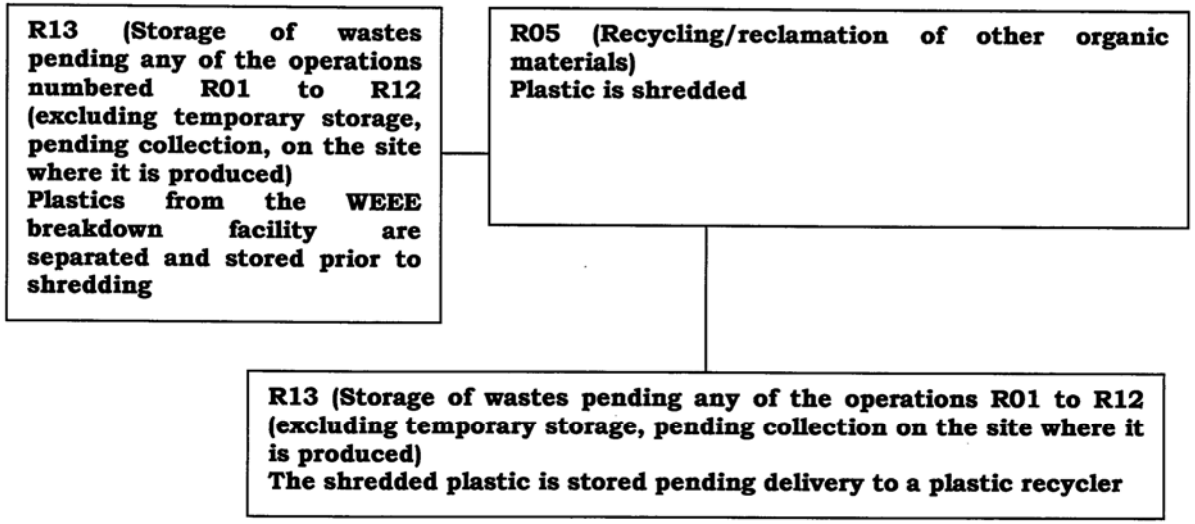
RISK ASSESSMENT – TFS001 SHREDDING OF NOMINALLY EMPTY DRUMS

HAZARD	POTENTIAL RISKS	RISK LEVEL	CONTROL MEASURES TO REDUCE OR ELIMINATE RISK	REVISED RISK RANKING
ASSOCIATED POLLUTION	POLLUTION FROM POWER GENERATION	MINIMAL	SINGLE SHAFT SHREDDER - ENERGY EFFICIENT OPTION	MINIMAL
POLLUTION TO AIR	VOLATILE EMMISSIONS RELEASED TO AIR DURING THE SHREDING PROCESS	MINIMAL	ALL CONTAINERS THAT ARE SHREDDED HAVE CONTAINED NON HAZARDOUS WATER BASED SUBSTANCES AND THEREFORE NO HARMFUL RESIDUES ARE RELEASED	NON EXISTANT
POLLUTION TO LAND	RESIDUES FROM NOMINALLY EMPTY CONTAINERS MAY ESCAPE ONTO THE GROUND	MINIMAL	RESIDUES CONTAINED WITHIN A BUNDED BUILDING. ALL SPILLAGES CONTAINED AND TRANSFERRED FOR BIOLOGICAL TREATMENT	MINIMAL
POLLUTION TO SURFACE WATER	RESIDUES FROM NOMINALLY EMPTY CONTAINERS MAY ESCAPE ONTO THE GROUND AND ENTER DRAINAGE SYSTEM	MINIMAL	RESIDUES CONTAINED WITHIN A BUNDED BUILDING. ALL SPILLAGES CONTAINED AND TRANSFERRED FOR BIOLOGICAL TREATMENT	MINIMAL
POLLUTION TO GROUNDWATER	RESIDUES FROM NOMINALLY EMPTY CONTAINERS MAY ESCAPE ONTO THE GROUND AND ENTER DRAINAGE SYSTEM	MINIMAL	RESIDUES CONTAINED WITHIN A BUNDED BUILDING. ALL SPILLAGES CONTAINED AND TRANSFERRED FOR BIOLOGICAL TREATMENT	MINIMAL
PERSONAL INJURY	POTENTIAL INJURY FROM ANY HAZARDOUS RESIDUES ESCAPING FROM THE CONTAINERS AND CAUSING PERSONAL INJURY	LOW	CONTAINERS THAT HAVE CONTAINED HAZARDOUS MATERIALS WILL BE RINSED PRIOR TO SHREDDING. ALL RESIDUES ARE CONTAINED AND TRANSFERRED FOR TREATMENT.	MINIMAL

PROCESS ID TFS003 – CRUSHING OF FLUORESCENT TUBES AND LAMPS



PROCESS ID WEEE01 SHREDDING OF PLASTICS



APPENDIX 10

OPERATION AND CONTROL OF WASTE TRANSFER FACILITIES

Index

10.0 Overview

The waste transfer station facility at Mekatek Limited complements existing treatment and disposal capabilities on site for mainly liquid biodegradable and oily wastes, received either in bulk or containers.

The purpose of the waste transfer station is to receive a variety of solid and liquid wastes, from households (via Civic Amenity Sites or managed collections) commercial and industrial sources. Where certain liquid wastes are compatible with licensed treatment capabilities on site, those wastes will be processed internally. All other wastes, will be subject to sorting, segregation, and where appropriate consolidation or repackaging, and finally, consignment on to other suitably licensed transfer, treatment, disposal or recovery facilities.

10.1 Management

Mekatek Limited operates an Internal Management System for site operations. Appropriate procedures and documents exist to manage and record activities. These activities are prefixed MP, MS or SWP and are available for inspection in the main offices.

Staff receive comprehensive training with regards to company procedures, operations, documentation and Heath and Safety requirements.

Staffing arrangements are outlined in section 10 of the main Waste Management Licence document reference EAWML 34045.

10.2 Waste Inputs

Wastes that are permitted for acceptance at the waste transfer facility are defined in Appendix 9 to EAWML 34045. Wastes may be accepted from any source or waste producer, and may include both hazardous (special), non hazardous, or inert wastes.

10.2.1 Pre-acceptance procedures to assess waste

Prior to acceptance of containerised or mixed fraction wastes to site, the waste producer (or broker) must complete a Customer Declaration Form (document MS1B). (Refer to Appendix 4 for site documentation). The document allows numerous items to be listed, and requires a declaration of any hazardous properties or other dangerous characteristic of the waste(s).

The Customer Declaration form needs to be completed for each waste producer and waste type. For repeat movements of the same waste(s) arising from the same waste producer, the original Declaration form will be deemed sufficient.

The information supplied on this form is primarily assessed for waste acceptance purposes.

For all wastes that are provisionally acceptable on this basis, additional information will be requested from the waste producer (or broker) in the form of Material Safety Data Sheets. Previous analysis and representative samples will be requested. Before a waste can be deemed acceptable at the facility a suitable treatment, recovery or disposal routes must be identified and costed for viability.

Information provided will be assessed for health and safety purposes, with relevant risk assessments and control measures checked to ensure staff safety when handling the waste(s) at the facility.

When the Laboratory staff are satisfied that a waste is suitable for acceptance and the necessary checks and assessments have been completed, the relevant documents will be passed to the Site Manager for final authorisation.

If the waste (s) are deemed unsuitable for acceptance at the facility the relevant parties will be informed, and documentation clearly marked as unacceptable. Documentation will be filed for a suitable period.

Assuming a waste is accepted a quotation will be issued to the relevant parties, bearing a unique reference number, prefixed by an MK designation.

This reference number will be assigned to the waste(s) received from this primary source, associated document trail and any relevant correspondence. Customers wishing to bring

waste to site, must pre-book all loads, by contacting the Mekatek Ltd administrative team and supplying the relevant details and reference number. Please see MP29 Bookings Procedure.

On booking a load for delivery to the transfer station, a customer will be issued with a TS booking number using MS41 Transfer Station Booking Confirmation)

10.2.2 Acceptance procedures when waste arrives at facility

On arrival at the site, the driver must report to reception or to the Laboratory. Staff will make initial checks on the documentation accompanying the load, to ensure that it is correct. All loads delivered to site should be accompanied by either a fully completed duty of care waste transfer note or hazardous waste consignment note. If there are any discrepancies the Laboratory and administration staff will take action to resolve the matter as appropriate, before proceeding any further.

Once the paperwork has been checked, a visual inspection will be carried out on the condition of the containers and the relevant labelling (all containers should be in a sound condition and labelling must be in accordance with the Carriage of Dangerous Goods by Road (Classification, Packaging and Labelling) and use of Transportable Pressure Receptacles Regulations 1996. Any damaged or badly labelled drums will be identified and will be quarantined for re packaging and sampling prior to off loading.

The vehicle will then be directed to the Transfer Station offloading area (The laydown area to the West side of the soluble oil bay or the transfer station entrance) and the containers offloaded using appropriate lifting equipment or vehicles and transferred to the transfer station. During the offloading process laboratory staff will take a representative sample (where possible) from $\sqrt{(N+1)}$ drums of each type of waste stream on the vehicle, for example if the load consisted of 40 x 205 litre drums of mineral oil and 40 x 205 litre drums of soluble oil then samples from 7 mineral oil drums and 7 soluble oil drums will be taken.

A single marked `inspection' bay within the facility will be dedicated to a single load. As the items are removed the labelling and condition of the packaging will be further checked.

Damaged or questionable items that have been identified as above will be isolated in an appropriate bunded unit or overdrum type container and the customer notified of any additional charges that may be incurred.

All items will be counted and the accompanying waste documentation confirmed or amended as appropriate. Once the operator is satisfied that all is in order, the waste documentation will be signed off and distributed appropriately, and the vehicle cleared to leave site.

All items from a particular load will be labelled showing the relevant MK number and TS number and logged onto the transfer station log.

The Laboratory and operating staff have a period of 14 days from the receipt of waste into the transfer station in which to assess or perform analysis on each individual container (as appropriate). Analysis will be conducted in accordance with Section 5 of the Working Plan subject to this 14 day rule.

Any items not conforming to the description given and not acceptable at the site under current licence conditions may be rejected from site within this period. Rejected items will be clearly labelled as rejected. These items may be returned to the waste producer or alternatively consigned to another suitably licensed waste facility. The Environment Agency will be informed of any rejected items in writing, stating the relevant reception and rejection date(s), waste description, reasons for rejection and subsequent action taken.

Items deemed acceptable will be moved from the `inspection bay' to the relevant ongoing treatment or storage for disposal bay.

10.3 Waste Sorting and Treatment

10.3.1 Waste storage

10.3.1.1 Transfer station building

The transfer station building provides an indoor sorting and storage area along with a number of segregated isolation areas for storage of materials incompatible with the main waste types received. To the rear of the transfer station is an outdoor laydown area for post segregation solid wastes.

Refer to Figure 2. for a simplified plan of the transfer station building and lay out, and site plan 1.1 in Appendix 1 for a location plan.

The transfer station building is secure, with lockable "roller shutter" or sliding access doors. The site as a whole is fully fenced, with CCTV cameras for additional security. The doors allow forklift access within the building.

Rainwater from the roof structure runs via guttering to down pipes that intersect the building. The down pipes link to the surface water drains internally. The access points to the surface water system are protected by an impermeable raised barrier. (Refer to Figure 4). There are no internal connected foul sewer drains.

The general fall of the floor surface is to the centre (refer to Figure 2). The floor of the building is constructed from concrete (between 6 to 9 inches in depth). Sealed sumps have been installed within the centre of the building as identified on fig 1 below. These sumps catch any spillages and wash down waters from day to day operations. Sumps are emptied periodically with the contents being isolated for analysis and toxicity testing before being either transferred to the biological treatment plant for treatment, or stored for disposal to a suitably licensed facility. All access points are protected with a concrete "lip" to provide an effective bund, all liquids being retained within the sumps identified above.

The inside of the building has individual `inspection bays' (for waste items received and requiring logging and sorting), `storage bays' for storing similar or compatible wastes (awaiting onwards transfer) and `despatch bays' for containerised wastes due for disposal off site. Suitable storage units or segregated isolation areas will be used for (i) highly flammable, (ii) Oxidising agents, and iii) miscellaneous unidentified or dangerous items. Damaged containers will be repackaged, made safe or stored on a suitable bund. Wastes that would react adversely on contact with the hardstanding floor area are stored within a suitable bund. (For example acids are stored in/on an acid resistant bund).

10.3.1.2 Lay down area

To the rear of the building, a laydown area provides a secure location for waste skips (for solid wastes). No liquids will be stored within this area. The skips (or other appropriate bulk containers) will allow for segregation and storage of solid dry wastes (typically with individual containers for asbestos, empty steel and empty plastic packaging). All skips and containers will be suitably covered or enclosed to protect them from the weather, and prevent any polluting run off.

This lay down area is fenced separately with lockable access gates. The surface of the laydown is constructed of compacted hardcore and concrete.

Empty non hazardous packaging (for example nominally empty steel 200 litre drums) may be stored within the transfer station building, within the laydown area or in other suitable storage locations within the facility providing this storage has no potential for detrimental impact on the environment.

10.3.2 Waste identification, tracking and documentation

All items received I the transfer station will be logged, labelled (as appropriate) and segregated according to the appropriate handling route. The waste log will be kept safely, and will record the reception, handling and final destination for all wastes received on site. The log will record relevant dates. reference numbers and document numbers (refer to Figure 3.)

The waste log will be retained in electronic format in the transfer station, with a back up copy retained in the main site office. A hand written log may also be maintained.

Once a load has been fully logged and passed `inspection' the fully completed waste transfer and consignment notes will be taken to the Main Office. All other internal documentation will be kept in the Laboratory, transfer station building, or Main Office as appropriate.

10.3.3 Waste treatment (on site)

Wastes that can be treated on site (as listed in Section 2 of the Working Plan) will be collected from the transfer facility (using suitable transfer, or pumping equipment, or vacuum tanker) and discharged in the relevant operating area elsewhere on site, in accordance with site procedures.

Any waste removed from the transfer station will be accompanied by an internal waste transfer note (MS39) and be moved only under the authorisation of transfer station foreman or site management, both the transfer station and main office will retain a copy of the note and the log will be updated as appropriate.

10.3.4 Waste sorting, segregation and consolidation

All wastes will be sorted, such that compatible and related wastes will be stored together in appropriate `storage bays'. Individual bays will be clearly marked and identified with appropriate signage. Incompatible materials will not be stored together in the same bay or adjacent bay(s).

Miscellaneous chemical and laboratory smalls

Small items (5 litres or smaller) may be sealed individually and packed safely together with regard to material compatibility in appropriate storage containers for disposal off site where relevant. A list of items collated will be displayed on the outside of the container and updated appropriately.

Consolidation and mixing of waste streams.

Multiple small containers or quantities of the same or compatible wastes may be consolidated in to a suitable single larger storage container. Laboratory staff will ensure compatibility of wastes. A list of items consolidated will be displayed on the outside of the container and updated appropriately.

(For example, the consolidation of waste paints from multiple small pots in to 205 litre steel tighthead drums or IBC's, or the consolidation of small quantities of bagged asbestos, in to one single skip).

The main transfer station log will identify all items consolidated into a larger container ie 205 litre drum of solvent based paints. It will also show on what dates waste items have left site for onward disposal or have been transferred internally for treatment.

During mixing and consolidation, wherever a beneficial reaction can be achieved (eg mixing water based paint and ferric chloride solution to separate the solids from the aqueous carrier) equipment will be installed where practical to enable these reactions to be carried out in a controlled manner. Equipment will be sited within the transfer station building or within another suitable building within the facility.

Packaging

Waste packaging arising from sorting and consolidation of wastes will be segregated appropriately. All containers that have contained liquid wastes will be emptied and drained as fully as possible before being allowed to stand to allow passive drying.

Small items of packaging may be subjected to further cleaning, crushing or shredding operations as appropriate. Wherever possible, redundant recyclable packaging will be cleaned prior to shredding or crushing to enable it to be recycled.
These operations will be carried out within the transfer station building or in a suitable area elsewhere within the facility.

Large items for re use on site or awaiting transfer off site (such as 200 litre drums and 1000 litre IBCs) will be stacked safely within the building, or externally within the confines of the licensed facility as long as they represent no risk to the environment. Smaller items (such as paint pots) may be stacked, palletised or containerised as appropriate.

10.4 Waste Consignments (leaving site)

By physically and electronically monitoring the numbers of containers and quantities of wastes within the transfer station facility, site staff will determine the appropriate timings for removal of wastes from site.

All Waste Carriers and Waste Management Facilities will be suitably licensed. Priority will be given to the recycling, recovery or re use of all discarded materials before disposal by

landfill or incineration routes are considered. Wherever practical the disposal route with least environmental impact will be followed.

All containers leaving site will be labelled appropriately with waste description and information or Carriage of Dangerous Goods as appropriate. All containers will be suitable and sound for transport purposes.

All skips and containers will be covered to prevent material escaping.

The appropriate duty of care waste transfer or hazardous waste consignment note(s) will be completed for waste collections. The Laboratory and operating staff will check the waste(s) on the list and prepare the load accordingly. Waste(s) may be moved in preparation to the 'despatch bay' to assist segregation of the load (if required).

The Site Manager or suitably trained member of staff will be responsible for overseeing the loading of the collection vehicle and the correct completion and signature of the waste documentation.

The transfer station waste log will be updated appropriately.

10.5 Control of Emissions and Emergencies

10.5.1 Control of emissions to air

The transfer station will not actively seek wastes that evolve hazardous fumes or emissions. However, operating procedures will demand that all containers storing liquid wastes will be kept sealed wherever possible, with lids, caps and bungs tightly in place to limit any potential emissions. All spillages will be cleaned up immediately, and recorded in the relevant day book.

10.5.2 Control of emissions to land

Liquid waste will be unloaded, handled and stored within the transfer station building. The flooring within the building and its surrounds is constructed of reinforced concrete. Wastes that could react adversely with the flooring will be stored in a suitable bund. Any significant spillages will be cleaned up immediately and recorded in the relevant day book.

Skips and materials stored in the outside laydown area will be covered to prevent material escaping.

10.5.3 Control of emissions to surface water, sewer and groundwater

There are no functioning drains within the transfer station building. Refer to the drainage system plans in Appendix 1. All spillages will be cleaned up immediately, and recorded in the relevant day book.

10.6 Abnormal Conditions and Emergencies

Any significant incidents involving fire or spillage will be reported to the Environment Agency as soon as practical, both verbally and in writing.

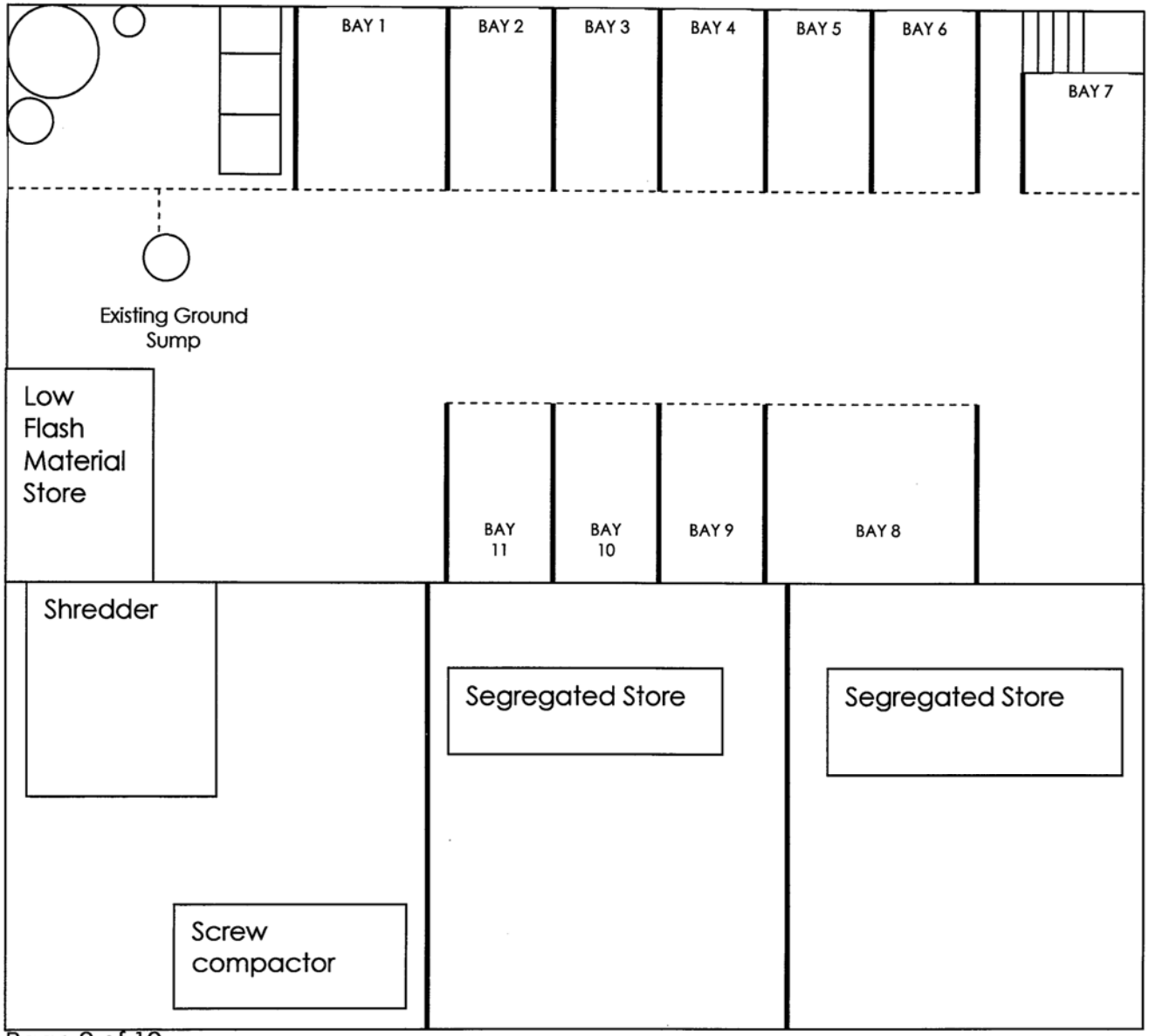
In the event of a fire or spillage, operators will attend immediately in accordance with the Emergency Plan (Appendix 7). Operators will be equipped with the correct PPE before dealing with any wastes.

The transfer station is equipped with fire extinguishers, and absorbent materials (`spill kit'). Additional equipment and resources are available on site including overdrum(s), pumping and transfer equipment, and vacuum tanker(s).

Contaminated clothing, absorbents and materials generated during an emergency response will be containerised, labelled and stored appropriately pending suitable treatment on site or transfer off site (as appropriate).

All serious health and safety accidents or 'near miss' incidents will be recorded and urgent action taken to prevent recurrence.

Figure 1. Layout plan for Waste Transfer Facility (not to scale)



Aco Drainage Channel

Please refer to Plan 1.1 (Appendix 1)

Figure 2. Example Waste Log from Waste Transfer Station Facility

WASTES RECEIVED						WASTES TRANSFERRED			
Date received	Waste Producer	Reference N°	Waste Description	Paperwork	Approx. Weight	Consolidation Container	Route	Date transferred	Paperwork
19/04/04	Joe Bloggs Automotive Ltd, Swansea	MK1227	3 x 205 litre drums soluble oil	EA 00234567	600kg	N/A	INTERNAL - SOB	20/04/04	Internal records
19/4/04	Robert Jenkins Builders, Pensarn	MK2435	Fly tipped wastes	EA 00876543					
			1 x 205 litre drum engine oil		200kg	N/A	INTERNAL - FOB	20/4/04	Internal records
			25 x 1 - 5 litre pots household paint (part full)		45 kg	205 litre ref. MK52 19/4/04	EXTERNAL	23/4/04	EA 00456789
			15 x car batteries		20 kg	N/A	EXTERNAL	28/4/04	EB 00678910
20/4/04	Carmarthenshire County Council Civic Amenity site Llanelli	MK3345	5 x car batteries	0645	6kg	N/A	EXTERNAL	28/4/04	EB 00678910
			12 x sheets broken asbestos		150kg	Skip ref. MK12	EXTERNAL	25/4/04	EA 00678908

Log would initially be completed by hand, and then data transferred to an electronic version. The electronic version may hold additional information to assist site operations and Quarterly Returns made to the Environment Agency.

MK Reference:

Mekatek Limited
Amex Park, Llanstephan Road,
Johnstown Carmarthen SA31 3NF
☎ **01267 236417** 🖷 **01267 233034**
enquiries@mekatek.ltd.uk

CUSTOMER DECLARATION FORM FOR THE ACCEPTANCE OF BULK WASTES

CUSTOMER (to be invoiced)	**WASTE PRODUCER (if different)**
ADDRESS POSTCODE	ADDRESS POSTCODE
TELEPHONE	TELEPHONE
FAX	FAX

CHEMICAL AND PHYSICAL DESCRIPTION OF THE WASTE

Approximate pH **Physical state** LIQUID/ SLUDGE **Approximate % solids**

PROCESS FROM WHICH THE WASTE IS DERIVED (including any details of pre treatment)

QUANTITY **FREQUENCY**

ODOUR Does the waste smell ? **YES/NO** If YES, give possible causes:

CUSTOMER DECLARATION OF WASTE CONSTITUENTS

Please declare the waste constituents, giving approximate concentrations (as percentage or ppm) wherever known;

	PRESENT	CONCENTRATION		PRESENT	CONCENTRATION
Flammable Liquids	YES / NO		Mercaptans/organo sulphur compounds	YES / NO	
Halogenated solvents	YES / NO		Phenols/halogenated phenols	YES / NO	
Sulphides	YES / NO		PCBs/PCTs/dioxins	YES / NO	
Oils, fats, or greases	YES / NO		Metals/metal compounds	YES / NO	
Amines	YES / NO		Agrochemicals	YES / NO	
Ammonia	YES / NO		Cyanides	YES / NO	

Does the waste contain any List I of List II substances as per EC directive 76/464/EEC ? **YES / NO**
Are ANY List I or List II substances used within industrial processes on the site, and if so is there any possibility of cross contamination ? **YES / NO**
If YES please provide additional information below:

Additional information (including details of any other **toxic, dangerous or objectionable contaminants**)

SAMPLE PROVIDED **YES / NO** **Previous analysis provided** **YES / NO**
Safety Data Sheets provided **YES / NO**

INTENDED WASTE CLASSIFICATION (tick one box);
Hazardous (special) ☐ Non hazardous ☐

Please note that acceptability of the waste is determined by the information declared above, and any supporting information supplied. If the waste is deemed acceptable, but on reception found to differ from this declaration, we reserve the right to reject the waste from site, with associated charges, or if acceptable under our licence conditions, we reserve the right to adjust the treatment and administrative charges accordingly. The Environment Agency may be notified of waste rejections, mis-descriptions and incorrect use of documentation. It is therefore imperative that the information above is as accurate as possible.

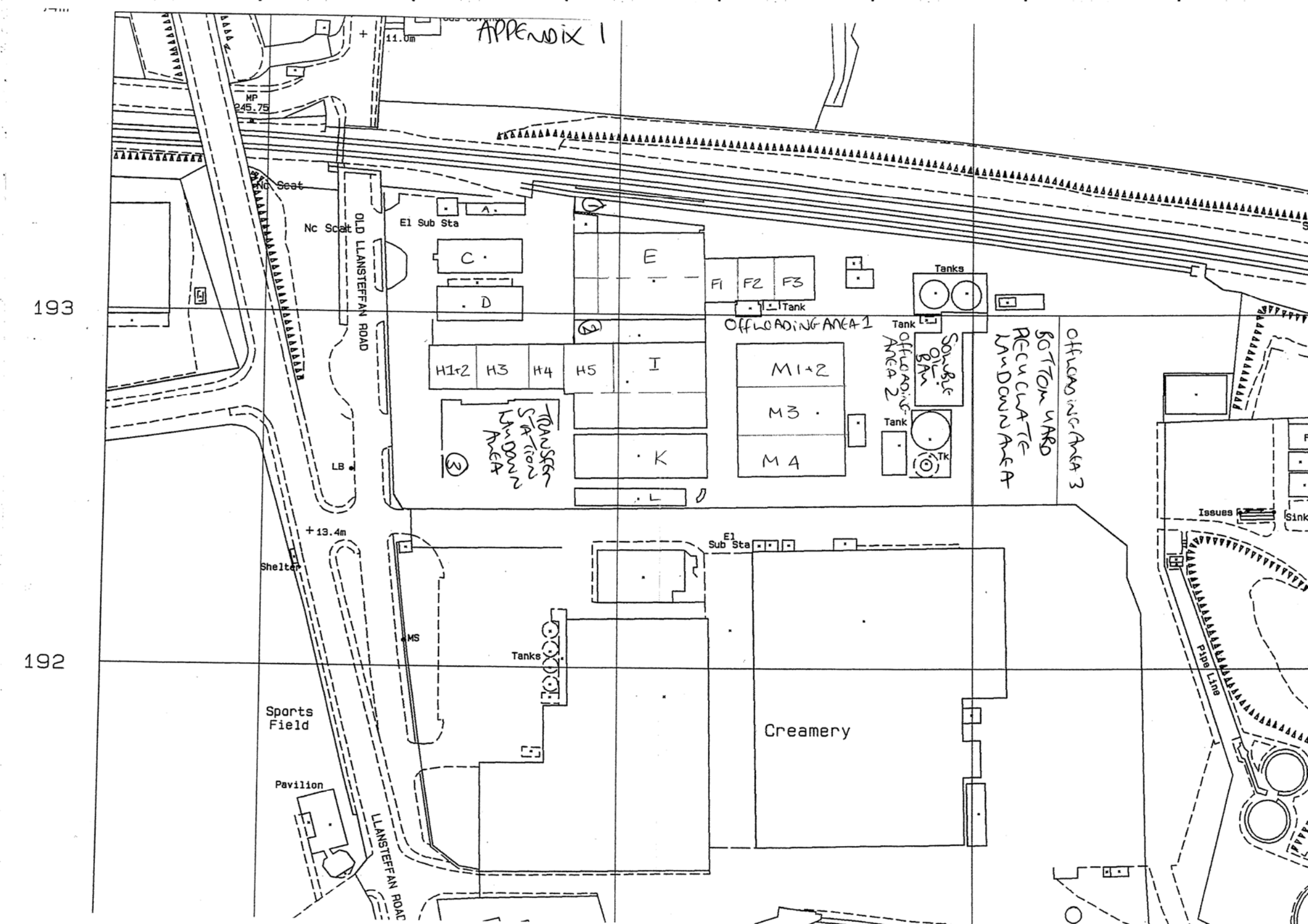
I guarantee that to the best of my knowledge the information given above is complete and accurate.

SIGNED: **DATE:**

On behalf of: **POSITION:**

LABORATORY/OFFICE USE **ACCEPTED / REJECTED**
Staff: Authorised by: Date:

FORM TO BE FULLY COMPLETED IN BLOCK CAPITALS OR TYPED


APPENDIX 1
11.0m
MP 245.75
Nc Seat
Nc Seat
OLD LLANSTEFFAN ROAD
El Sub Sta
A
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F2
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Tank
OFFLOADING AREA 1
Tanks
Tank
Tank
OFFLOADING AREA 2
SOLUBLE OIL BAY
BOTTOM YARD RECYCLATE LANDOWNER AREA
OFFLOADING AREA 3
H1+2
H3
H4
H5
I
M1+2
M3
M4
K
L
TRANSFER STATION LANDOWNER AREA
193
LB
+13.4m
Shelter
MS
El Sub Sta
Tanks
Creamery
192
Sports Field
Pavilion
LLANSTEFFAN ROAD
Issues
Sink
Pipe Line

MK Reference:

Additional sheet(s):

Mekatek Limited

Amex Park, Llanstephan Road,
Johnstown Carmarthen SA31 3NF
☎ 01267 236417 🖹 01267 233034
enquiries@mekatek.ltd.uk

CUSTOMER DECLARATION FORM
FOR ACCEPTANCE OF CONTAINERISED WASTES OR SEPARATELY COLLECTED WASTE FRACTIONS

CUSTOMER (to be invoiced)	WASTE PRODUCER (if different)
ADDRESS POSTCODE	ADDRESS POSTCODE
TELEPHONE	TELEPHONE
FAX	FAX

CHEMICAL AND PHYSICAL DESCRIPTION OF THE WASTE

QUANTITY	CONTAINER SIZE (WHERE RELEVANT)	DESCRIPTION	PHYSICAL STATE (LIQUID/SLUDGE/ SOLID)	HAZARDS e.g. H3 H4 (REFER TO NOTES*)

PROCESS FROM WHICH WASTE HAS BEEN DERIVED (including any details of pre treatment)

FREQUENCY **ODOUR** Does the waste smell ? **YES/NO**

CUSTOMER DECLARATION OF WASTE CONSTITUENTS

Please declare if any of the wastes described above contain any of the following waste constituents, giving approximate concentrations (as percentage or ppm) wherever known;

	PRESENT	CONCENTRATION		PRESENT	CONCENTRATION
Radioactives	YES / NO		PCBs/PCTs/dioxins	YES / NO	
Phenols	YES / NO		Agrochemicals	YES / NO	
List I or List II substances	YES / NO		Cyanides	YES / NO	
			Ammonia	YES / NO	

SAMPLES PROVIDED	**YES / NO**	**Previous analysis provided**	**YES / NO**
		Safety Data Sheets provided	**YES / NO**

Please note that acceptability of the waste is determined by the information declared above, and any supporting information supplied. If the waste is deemed acceptable, but on reception found to differ from this declaration, we reserve the right to reject the waste from site, with associated charges, or if acceptable under our licence conditions, we reserve the right to adjust the treatment and administrative charges accordingly. The Environment Agency may be notified of waste rejections, mis-descriptions and incorrect use of documentation. It is therefore imperative that the information above is as accurate as possible.

I guarantee that to the best of my knowledge the information given above is complete and accurate.

SIGNED: **DATE:**

On behalf of: **POSITION:**

NOTES *Hazardous waste and `hazards' defined as per the Directive 91/689/EEC, Special Waste Regulations 1996 (as amended) and all related legislation, summarised as H1 Explosive H2 Oxidising H3A Highly Flammable H3B Flammable H4 Irritant H5 Harmful H6 Toxic H7 Carcinogenic H8 Corrosive H9 Infectious H10 Teratogenic H11 Mutagenic H12 Substances releasing toxic gases in contact with water, air or an acid, H13 Substances yielding hazardous substances after disposal H14 Ecotoxic

FORM TO BE FULLY COMPLETED IN BLOCK CAPITALS OR TYPED
WASTE LIST MAY BE CONTINUED ON ADDITIONAL SHEET(S)

Mekatek Limited

MP26 EMERGENCY PLAN

Communication

On occurrence or discovery of an incident, the Site Manager should be immediately informed, followed by the main office, whatever the nature or magnitude of the problem.

Telephones with Emergency service dial facilities are available at the main effluent plant pump house, the office area in the soluble oil treatment building, and the main office reception area at the entrance to the facility. The Site Manager and key staff carry mobile phones.

At no time should site personnel compromise their own personal safety or put themselves in immediate danger when tackling an incident on site.

General

Appropriate risk and COSHH assessments have been carried out for the waste treatment operations, and wastes handled on site in accordance with the appropriate legislation and the site licence. Fire assessments have been carried out in accordance with the appropriate legislation. Information from these assessments has contributed to this emergency plan. Assessments are reviewed on a regular basis or as required.

Procedures and practices for staff training, provision of appropriate materials and equipment for emergency procedures are covered more fully in the Mekatek Limited Health and Safety Policy document.

The site operates on a single shift basis, should a second shift be required then this would be for a specific reason and handover would be undertaken by site management. The plant does not handle any wastes which is likely to cause any dangerous reactions for which a safe shutdown procedure would be required.

Personal Protective Equipment

Staff are provided with full personal protective equipment (P.P.E.) at all times in the normal operation of the site. Special P.P.E. is available in the form of eye and hand protection, chemical resistant suits and breathing apparatus, should the need arise.

Emergency Evacuation Procedure

In the event of the fire alarm being raised, or in any other emergency situation (such as a bomb scare), all employees must leave their building by the nearest available exit and assemble at the designated assembly point. The designated assembly points for each area are as follows:

Site Area	**Assembly Point**
Main Company Office	On the far side of Old Llanstephan Road, opposite the main office entrance
Soluble Oil Bay, HSBE, Biological Treatment Plant,Transfer Station, WEEE Facility, Free Oil Bay	Beside the fence that runs between Mekatek Ltd. and the St Ivel Ltd. property.

Incoming Wastes

Please see the following internal procedures MP10 Waste Acceptance (New Wastes) and MP11 Waste Acceptance (Permitted Wastes) also for wastes received in the waste transfer station Appendix 10 of Waste Management Licence EAWML34045 TP/1. Any wastes transferred from the transfer station to any part of the treatment plant f.e soluble oil bay, free oil bay, effluent plant or high strength biodegradable effluent area are accompanied by an internal transfer note which provides details of the waste type, volume, producer and the date that the waste was transferred internally, one copy of this note is kept by the transfer station and one copy is kept by the receiving operating area. For wastes delivered to the transfer station there is internal segregation according to hazards i.e flammable, corrosive, toxic, oxidizing. All oxidizing materials are stored in a separate section of the transfer station, all materials are stored in accordance with a segregation chart which illustrates which hazards can be stored together and which cannot. All incoming wastes to the transfer station are recorded on the transfer station log. All incoming wastes to the soluble oil, free oil bay and high strength biodegradable effluent area are recorded in the respective day books, all tanks are checked for volume and integrity daily. All incoming waste streams are assessed for suitability in accordance with MP10.

Small containers of paints, oils and acids etc are transferred into larger containers for internal transfer or for removal from site all bulking up procedures are carried out within the transfer station building in accordance with Appendix 10 of Waste Management Licence EAWML34045 TP/1.

Delivery of wastes

For wastes delivered to the transfer station before unloading commences the integrity of the pallets on which the drums are placed on are checked by the transfer station foreman, should the pallets need replacing then this is completed within the inspection bay in the transfer station, all forklift drivers have received suitable external certificated forklift driver training.

For wastes delivered to the free oil bay discharge is carried out above a "drip" strip

For wastes delivered to the high strength biodegradable effluent area vehicles reverse until the discharge valve is over the bund wall of the raised concrete tanker reception area forward of the main bund wall. Any drips during transfer are therefore contained within the bunded area.

For wastes delivered to the soluble oil bay all vehicles reverse up to the bunded reception bay alongside the storage area from where discharge is effected.

There are no waste streams received on site that will create unexpected reactions due to the initial assessment of incoming waste streams.

Spillage of Hazardous Material

All site personnel are fully conversant with the deployment of the specialist absorbents and methods used on site in the event of a minor spillage. Please see MP38 Spillage Response Procedure for further details.

Any spillages occurring within the transfer station remain within the building and can be removed via pumping equipment or vaccum tanker.

In the event of a minor spillage of either hazardous or non- hazardous material occurring outside any of the bunded areas this will immediately be dealt with by means of absorbent materials (in the form of booms, pads, clay granules, sawdust, sand, etc.) depending on the size and nature of the spill. A wide range of these materials is held on site as a precaution against any such incident. Emergency spillage kits containing specialist chemical or oil absorbents (whichever is appropriate) are stored at the main laboratory, soluble oil treatment area, and designated drum containment areas. Specialised pumping units are available to "suck up" any contained spillage. Any contaminated absorbents or materials will be stored in appropriate containers prior to disposal by a licensed waste contractor.

A major spillage incident would be considered as a spillage of a volume of hazardous material that exceeded the containment capability of both suitable absorbents or manual methods.

In the event of a major spillage of hazardous or non-hazardous material occurring *within* any of the bunded areas this will immediately be dealt with by pumping the material to a suitable storage vessel for treatment in the normal manner.

In the event of a major spillage of hazardous or non-hazardous material occurring *outside or breaching* any of the bunded areas this will be contained as well as possible. The material will be pumped to a suitable storage vessel for treatment in the normal manner, as quickly as possible, probably by means of the company vacuum tanker or other vacuum tankers on site at the time. If there are none on site then appropriate tankers would be brought in under emergency request. Specialist emergency spillage contractors would be called in immediately if necessary.

Where the spillage occurs in the proximity of sensitive drains, they will be physically sealed and protected by use of mechanical drain covers held on site.

Damage occurring to containers or tanks resulting in small leaks or weaknesses may be sealed with the use of `drum plug' or similar products held on site.

All high level vessels have visual gages, all low level vessels are visually checked during filling up to avoid overfilling. All pipework is visually checked, all drains are jetted annually and visual checks are carried out, all site operational staff are trained in how to make correct connections between different parts of the effluent plant process.

Staff will respond to incidents in accordance with both MP37 Spillage Response Procedure and MP33 Incident Management Plan.

Discharge of effluent to river

All effluent discharged to river is analysed twice daily, the plant is discharging 24 hours a day if the effluent is found to unsuitable the effluent is recirculated through the treatment plant.

Fire

All standard precautions are taken to prevent the outbreak of fire within the site. All staff are conversant with the locations of fire fighting equipment and the methods of treating a *minor* fire incident.

A major fire incident would be considered as a fire that was unable to be safely controlled or extinguished by site personnel using site fire fighting and safety

equipment. The appropriate emergency services would be contacted immediately to deal with the incident.

In the unlikely event of fire, fire fighting equipment including fire extinguishers and blankets are located around the site (as appropriate to the fire risks in each location);

1 No. water and 1 No. carbon dioxide extinguisher in the main office
2 No. dry powder extinguishers in the Free Oil Area
2 No. dry powder extinguishers in the High Strength Biodegradable Effluent area.
2 No. dry powder extinguishers in the Soluble Oil Treatment Area
1 No. powder and 1 No. carbon dioxide extinguisher in the main pump house
1 No. carbon dioxide extinguisher in the Centrifuge Area
1 No. powder extinguisher in the far pump house
2 No. water and 2 No. carbon dioxide extinguishers in the laboratory
2 No. dry powder extinguishers in the workshops
2 No. dry powder extinguishers in the Transfer Station
1 No. carbon dioxide extinguisher in the WEEE Facility
2 No dry powder extinguishers in the Company Vehicle

Any firewater generated by firefighting would be directed to the treatment plant where it can be isolated and analysed before being treated and then discharged river.

Failure of main services
There is a back up generator to run the main effluent plant, in the event of a failure of power all incoming loads will be evaluated, there is an oil boiler on site and in the event of a failure of the oil boiler any incoming oil loads will be evaluated

First Aid
First aid equipment is located at the following strategic points throughout the workplace; within the main company office, soluble oil treatment building, workshop, transfer station and in the main biological treatment plant pump house. All first aid equipment stores are clearly marked, include basic first aid information and are easily accessible by all employees during all working hours. Mekatek Limited has a qualified first aider on the staff who has a mobile first aid kit. Eye wash stations are available at appropriate locations.

Operator Error

All operators are trained in spillage response, fire safety, operational training for equipment in their operating area, a record of this training is retained and updated and details when refresher training is required.

Security
The site is a closed site with no public access or public right of way, please see site security procedure MP37,transfer station staff are responsible for locking the man gate, Geoff Matthews (Site Manager)or in his absence Daniel Lewis (Assistant Site Manager) locks the main gate, the main gate has a security camera at the top of the gate, the images generated by the camera can be viewed on an e-mail system by both management and administrative staff. All operating areas are locked when the site is closed.

Reporting Procedure and Records
A **minor incident** only merits internal notification following the incident. Initially, a record will be made in the appropriate Day Book (for spillage, fire or other) or Accident book (for personal injury) and a further full report will be made by the

person(s) involved for inspection by the Site Manager and Health and Safety Co-ordinator (if deemed appropriate).

All **major incidents** will be followed by a full report made by the person(s) involved and investigation by the Site Manager and Health and Safety Co-ordinator. This will be followed by a full risk assessment, to generate recommendations and any necessary alterations in order to prevent the likelihood of such an event re-occurring. Copies of the report will be made available to the necessary operating bodies. It is the policy of Mekatek Limited to comply with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR 95).

All major spillage incidents will be reported to the Environment Agency (Environment Protection Team, Crosshands by Mekatek Limited management.

Accident Management Team

Paul Mellor – Managing Director – Reporting to the Health and Safety Executive (as applicable)
Kate Goodchap – Company Secretary – Reporting to the Health and Safety Executive (as applicable)
Geoff Matthews - Operational responsibility for management of incident
Daniel Lewis – Assistant Site Manager – Operational responsibility for management of incident
Rachel White – Health and Safety Co-ordinator – Immediate first aid provision, log of events and witness statement (where applicable)

Please see attached risk assessment for further details