ENVIRONMENTAL MANAGEMENT SYSTEM

Unit 1, Abbey Road, Redwither Business Park, Wrexham, LL13 9RF

AST Plastic Containers UK LLP

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Waste, Planning & Environmental Consultants

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Site Information & Key Contacts List

Site Address:	Unit 1, Abbey Road, Redwither Business Park, Wrexham, LL13 9RF		
Site Operator:	AST Plastic Containers UK LLP	**National Grid Ref:**	SJ 38169 50527

CONTACT	DESCRIPTION	OFFICE HOURS	OUT OF HOURS
Matthias Hochholzer	Managing Director	01978 661 590	01978 661 590
Gavin Shepherd	TCM and Site Manager	01978 661 590	07554 661 438
Wrexham Maelor Hospital Croesnewydd Road, Wrexham, LL13 7TD	Local NHS Hospital (Main)	01978 291100	999
	Accident & Emergency (A&E)	999	999
Caia Park Surgery Prince Charles Road, Wrexham, LL13 8TH	Local Doctor Surgery (GP)	01978 291129	999 or 112
North Wales Police Former Oriel Gallery, Rhosddu Road, Wrexham, LL11 1AU	Local Police Non-Emergency	0300 330 0101	999 or 112
North Wales Fire & Rescue Service Chirk Fire Station, 38 Colliery Road, Chirk, Wrexham, LL14 5PS	Fire and Rescue Service (In Emergency Dial 999)	999 or 112	999 or 112
Natural Resources Wales (Nearest Office) Chester Road, Buckley, CH7 3AG	Environmental Regulator	0300 065 3000	0300 065 3000
Wrexham County Borough Council 16 Lord Street, Wrexham, LL11 1LG	Local General Enquires	01978 292000	999 or 112
Dwr Cymru (Welsh) Water	Main's water and sewerage supplier	0800 052 0130	0800 783 4444
Oaktree Environmental Ltd - Lime House, 2 Road 2, Winsford, Cheshire CW7 3QZ	Specialist Advisor (Waste and Planning Issues)	01606 558833	999 or 112 or

1 General considerations

1.1 Site operator/permit information

1.1.1 AST Plastic Containers UK LLP will operate an A16a Hazardous Waste Physical Treatment Facility. The site will allow for the acceptance, storage and treatment of predominantly plastic containers for recovery.

1.1.2 AST Plastic Containers UK LLP are a leading manufacturer of high-quality plastic containers. In addition to the above the site, the operator also has a non-waste plastic container manufacturing facility for hazardous liquids ranging from 200 millilitre - 220 litre containers. The manufacturing is situated at Unit 70 Clywedog Rd E, Wrexham LL13 9XE.

1.1.3 AST Plastic Containers UK LLP are market leaders in the design and manufacture of plastic containers and caps for use in a range of sectors including the food, chemical and pharmaceutical industries. The company manufacturers from six sites across Europe and distributes more than 100 million units a year to customers in more than 15 countries. AST is a manufacturer for plastic containers for., all in various colours, weights and shapes.

1.1.4 This EMS will be subject to a detailed annual review and this review does not preclude periodic updates that may arise from experience of operating the site as it is a living document and may be updated at any time.

1.1.5 Developments in legislation such as the regular increases in the Landfill Tax have increased the need for effectiveness and scope of operations at waste transfer and recycling centres, leading to greater recovery rates for recyclable waste.

1.1.6 This EMS will also incorporate the proposed plastics sorting and treatment plant to be installed which will enable more recyclable materials to be removed from the waste input thus complying with local, regional and national targets. AST Plastic Containers UK LLP prides itself on the quality of material they re-produce aim for 100 % conformity so end customers can be assured of quality materials at all times. AST Plastic Containers UK LLP has

a stringent quality process across its business structure to ensure these standards are achieved.

1.1.7 The site will receive waste from in-house collection operations and a number of other carriers from surrounding areas, delivering pre-selected waste from customers.

1.1.8 The EP will be regulated by the NRW under the Environmental Permitting (England & Wales) Regulations 2016.

1.2 Relevant contacts

1.2.1 Registered office details for the operator are as follows:

AST Plastic Containers UK LLP
Unit 1, Abbey Road
Redwither Business Park
Wrexham
LL13 9RF

Contact: Matthias Hochholzer
Position: Managing Director

1.2.2 Oaktree Environmental Ltd have been engaged to act as consultants for AST Plastic Containers UK LLP to assist in the preparation of this Environmental Management System (EMS). This EMS has been prepared to meet the requirements of The Environmental Permitting (England and Wales) Regulations 2016 and the Natural Resources Wales Guidance: "*how to comply with your environmental permit*".

1.2.3 Contact details for Oaktree Environmental Ltd are as follows:

Oaktree Environmental Ltd
Lime House
2 Road Two
Winsford
Cheshire CW7 3QZ

Contact: Chris Parry
Position: Senior Consultant
Tel: 01606 558833
E-mail: chris@oaktree-environmental.co.uk

1.3 Site location

1.3.1 The site is located at Unit 1, Abbey Road, Redwither Business Park, Wrexham, LL13 9RF as shown on Drawing Nos. ABB/2789/01 & 02. The national grid reference for the site is SJ 38169 50527

1.3.2 The site is predominantly located in an industrial area; immediately surrounding the site is numerous industrial premises.

1.4 Permit area/waste management operations

1.4.1 The permit boundary is outlined in green on Drawing No. ABB/2789/02. All references to 'the site' in this EMS shall mean the area inside the permit boundary and associated infrastructure, plant and equipment.

1.4.2 The Environmental Permit is required for the storage (keeping) prior to removal, and treatment (all types of handling/processing) of waste. Waste treatment processes to be carried out on site may include the following:

- drum/container washing, manual sorting, separation, screening, baling, pelletising, flaking, dehydrating, shredding, granulating, crushing or compaction of waste into different components for disposal, or recovery.

1.4.3 Specified waste management operations include waste disposal and waste recovery operations listed Annex I and II of The Waste Framework Directive 2008/98/EC and are listed in summary below:

- R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)
- R3: Recycling/reclamation of organic substances which are not used as solvents
- R4: Recycling/reclamation of metals and metal compounds
- D14: Repackaging prior to submission to any of the operations numbered D01 to D13

- D15: Storage pending any of the operations numbered D01 to D14 (excluding temporary storage, pending collection, on the site where the waste is produced)
- D9: Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are disposed of by any of the operations numbered D01 to D12

1.5 Hours of operation

1.5.1 The site will operate on a 24/7 basis with approximately two days per month being shutdown to carry out a full housekeeping

1.5.2 In the event that the site is closed or not in operation for any reason, the gates will be locked and secured to prevent unauthorised vehicular and/or pedestrian access and a 24-hour security presence will be maintained to monitor waste and product stocks.

1.6 Waste types and quantities

1.6.1 The waste types handled on site will consist of hazardous and non-hazardous household, commercial and waste arising's as defined in the Controlled Waste (England and Wales) Regulations 2012 and Section 75 of the Environmental Protection Act 1990. Although the permit allows a wide range of wastes to be accepted the majority of inputs will consist of High Density Poly Ethylene (HDPE) plastic comprising 120-220 litre jerry cans.

1.6.2 A detailed breakdown of the waste types accepted at the site will be included in Appendix III of this EMS as part of the EP. No dusty, clinical or sludge wastes will be accepted at the site. Any liquid waste accepted will be minor constituents left in a container. The main waste codes accepted will be:

- 15 01 02 - plastic packaging
- 15 01 10* - packaging containing residues of or contaminated by hazardous substances
- 19 12 04 - Plastic

1.6.3 In terms of EWC code 19 12 04, this material will comprise mechanically sorted plastic arising from other waste management facilities. The material may arrive to the site in baled form or in shrink wrap. The waste prior to being will undergo the procedures shown in the sections below.

1.6.4 **Non-hazardous waste (containers)** - The site would look to accept <5,000 tonnes a year of non-hazardous waste which on average would equate to 15 – 20 tonnes a day. Using the assumption that each empty container weighs a maximum of 0.0010 tonnes, this would equate to approximately 15,000 200 litre plastic containers per day.

1.6.5 **Non-hazardous waste (baled form)** – The site would accept approximately 2 - 3 loads of baled material per week. Each load of baled waste would comprise approximately 22 – 26 tonnes so at most the site would receive 26 tonnes per day of baled waste. It must be noted the predominate source of waste will be containers and the site may only accept 2 – 3 loads a month of baled material. Based on this, the maximum amount of baled material stored would be 26 tonnes.

1.6.6 **Hazardous waste** - The site would look to accept <3,650 tonnes per annum of hazardous plastic containers which would equate to <10 tonnes per day and the site would not store >50 tonnes (50,000 containers) of any hazardous plastic containers at any one time.

1.6.7 Prior to or following collection of any hazardous waste, the site chemist will review the collection request and then assess the proposed collection for compliance with material safety data sheet requirements, hazardous waste regulations and the Duty of Care. Customers will be encouraged to return containers which have been washed to remove residues.

1.6.8 The containers will normally arrive on a wooden pallet which would hold approximately 16 containers 48 containers (4 containers high, 4 containers wide) with each pallet measuring approximately $1m^2$. The pallets could be safely stacked 3 high which would equate to a height of approximately 3m. However, it must be noted that pallets containing smaller containers are likely to have approximately 60 – 100 containers on each pallet. The overall

height, width and length would be similar for each pallet. Based on this, the weight of each pallet would be approximately 0.5 tonne.

1.6.9 In addition to recycling the plastic containers, some of the pallets holding the containers would arrive wrapped in low density polyethylene (LDPE) plastic which the operator would also recycle through the same treatment plant proposed at the site. The site will also accept sorted, baled or wrapped LDPE from other waste management facilities. All waste acceptance into the site will taken to **AREA 1** once passed initial inspections.

1.6.10 As outlined in 1.6.5, baled plastic would also be stored in **AREA 1** but only one load of baled waste would be stored at any one time. The area is large enough so containers and baled can be clearly segregated.

1.6.11 If the maximum storage capacity of the site is reached, then no further waste will be accepted until waste can be removed from the site and taken to a suitably permitted or exempt site.

1.6.12 The storage volumes in cubic metres for the purpose of complying with the Fire Prevention and Mitigation Plan guidance are shown on Drawing No. ABB/2789/03 and in the table overleaf.

Table 1.1 – Waste Storage Table

Plan Ref	Description	Storage type	Max width (m)	Max length (m)	Max height (m)	Max area (m)	Max volume (m^3)	Approx. tonnage	Max storage time	Comments
AREA 1	Waste acceptance and inspection area	Mixture of processed and unprocessed plastic packaging and containers / drums including baled form	12	10	3	120	360	50	<24 hours	It must be noted that the containers/drums are likely to be empty so the actual tonnage will be low and the self-combustion risk is extremely low. Baled waste would comprise a maximum of 26 tonnes.
AREA 2	Non-hazardous plastic container storage	As above	12	10	3	120	360	25	<1 week	As above
AREA 3	Hazardous plastic container storage	As above	10	10	2	50	200	5	<11 hours	As above
AREA 4	Rejected / untreatable waste	As above	5	10	2	50	150	5	<48 hours	Area emptied every 48 hours

1.7 Exempt activities

1.7.1 Activities which are outside the scope of the EP for the site (listed in Schedule 3 of The Environmental Permitting (England and Wales) Regulations 2016) may be carried out at the recycling centre and the relevant details would be registered with the NRW prior to commencement.

1.7.2 Registration - Future exemption notifications and register entries are/will be held in the site office. Registered exemptions are valid for a period of 3 years. If the activity is to be carried on after 3 years, a renewal will be submitted to the NRW.

1.7.3 Wastes brought onto site as part of exempt waste activities will be kept clearly segregated and identified from those wastes imported for the specified waste management operations.

1.8 Staffing and management

1.8.1 The site will require 12 staff to be fully operational to ensure the site can operate to its capability. Staff members will include managing directors, site manager, technically competent manager, operational staff and on-site chemist.

1.8.2 All operational staff and contractors must be aware and understand the contents of the Environmental Management System (FPMP) and its location in order to respond and action the proposals set out in this FPMP to ensure the three objectives in Section 1.1.1 are met.

1.9 Health and safety

1.9.1 All operations on site will be carried out in accordance with the relevant requirements of the Health and Safety at Work Act 1974. Conditions of site use for employees, visitors and contractors are shown in Appendix IV. These conditions will be shown to all site users and must be signed prior to using the site. Anyone refusing to comply with the conditions of use will be asked to leave the site.

1.10 Fit and proper persons

1.10.1 The site's Technically Competent Manager (TCM) will be Gareth Shepherd who will provide the required attendance time at the facility as required by guidance periodically issued by the NRW. A copy of TCM's Certificate of Technical Competence (COTC) will always be made available in the site office.

1.10.2 The company, through the TCM, will ensure that a nominated deputy is sufficiently trained and familiar with the EP and this EMS document in addition to all relevant company procedures who, in the absence of the TCM, will act the competent person. If either the TCM or deputy is changed, the NRW will be informed of the change and the relevant details of the replacement as soon as possible.

1.10.3 At the time of this EMS production, none of the relevant people associated with the operator had been convicted of a relevant offence.

2 Site engineering and infrastructure

2.1 Site description

2.1.1 The recycling centre comprises a building measuring approximately 6,400m^2, approximately 1,200m^2 of this is dedicated for offices, staff training and welfare. The remaining part of the building will comprise the proposed plastic container recycling and production facility. The recycling aspect of the operation will take place to the northern part of the building which will house the variety of fixed treatment plants. The southern part of the building will be where the manufacture of plastic containers will take place. The main access/egress into/out of the building for deliveries/removals of waste material will be to the south-west of the building via two roller shutter doors and there is also an additional roller shutter access to the north of the building. Adjacent to the two roller shutter doors is an impermeably surfaced and sealed concrete pad measuring approximately 600m^2, the concrete pad will be used for unloading/loading of plastic containers onto articulated HGVs. Surface water arising from this concrete pad will drain into a sealed sump and not into the surface water drainage system. The remaining areas of the site are comprised of tarmac and hardcore for vehicle/plant manoeuvring and a large grassed/vegetated area which may be used for expanding the site in the future.

2.2 Access and parking

2.2.1 The site is accessed off Abbey Road on Redwither Business Park. The SITEL has dedicated staff and visitor car parks off site (outside of the permit boundary) as shown on Drawing No. ABB/2789/02.

2.3 Site office

2.3.1 The site office is shown on Drawing No. ABB/2789/02 and the list below details the relevant site documentation which will be kept in the site office.

Documents to be retained in site office
The Environmental Permit (original & any subsequent variations)
This Environmental Management System (NRW agreed document)
Fire Prevention & Mitigation Plan (NRW agreed document)
Current site diary (to record all inspections/visitors to the site)
Natural Resources Wales inspection (CAR) forms
In-house inspection sheets/recording forms
Duty of care transfer notes (for 2 years minimum)
Hazardous waste consignment notes (rejected waste, etc., kept for 3 years)
Waste delivery tickets
Accident book (& 1st aid kit)

2.4 Weighbridge

2.4.1 There is no weighbridge ay the site but the weight of each load into and out of the site will also be estimated using the standard EA/WRAP agreed volume-to-weight conversion factors.

2.5 Notice board and signs

2.5.1 A notice board will be erected at the site entrance of both sites displaying the following information:

- The site name and address.
- The name of the permit holder and operator.
- The Environmental Permit number and accompanying statement stating that the site is permitted by the NRW.
- NRW contact details, Emergency No. 0300 065 3000 and
- General Enquires No. 0300 065 3000.
- Operator's "out of hours" emergency contact details (telephone number).
- Operating hours.

2.5.2 Additional signs will be displayed around the site for operational / health & safety purposes. All staff and visitors will be required to comply with the requirements of all signs whilst on site.

2.6 Site security

2.6.1 The site's security measures are shown on Drawing No. ABB/2789/03 and considered suitable to prevent unauthorised vehicular or pedestrian access. It must be noted that operations in the building will be taking place 24/7 so there will always been staff present to prevent any risk of arson occurring.

2.6.2 The site bill benefit from 24-hour security with remotely accessible CCTV fitted with full site coverage and off-site supervision. The CCTV has been installed by ADT Security Services who also maintain and act as the third-party monitoring company CMS Security who will view any footage in the event an alarm and notify the site manager / TCM in any incidents. ADT Security Services UKAS accredited and provide a response time to any incident within 42 seconds which is the fastest in the industry.

2.6.3 The site security measures will be inspected on a daily basis and any defects which impair the effectiveness of the security will be repaired as soon as practicable. If this is not possible, temporary measures will be put in place to ensure no unauthorised access to the site can be gained until the proper repairs can be carried out.

2.6.4 If unauthorised access becomes apparent as a problem at the site the security measures will be reviewed and improvements implemented.

2.7 Fuel storage

2.7.1 Any fuel storage on site will be undertaken by the following measures:

- Tanks are surrounded by a bund capable of containing a minimum of 110% of the volume of fuel stored in the tank.
- All pipework and associated infrastructure will be enclosed within the bund.
- A lock will be fitted to the tank valve to prevent unauthorised operation.
- All valves and gauges on the bund will be constructed to prevent damage caused by frost.
- The tank is stored 6m away from any waste processing equipment.
- The tanks are clearly marked showing the product within and its capacity.

2.8 Rejected / quarantined waste

2.8.1 Clearly labelled enclosed skips/containers will be provided for the deposit of rejected waste which cannot be removed from the site immediately. The location may be varied as operating conditions permit (i.e. to permit the loading of rejected wastes) but clear labelling and management control will ensure its use as specified.

2.9 Drainage

2.9.1 The site drainage is shown on Drawing No. ABB/2789/03 and storage and processing operations which have the potential to create contaminated runoff will be contained within the sealed building.

2.9.2 As detailed in Section 2.1, the unloading of waste which would comprise containers on pallets wrapped in shrink wrap will take place on an external concrete pad. The concrete pad has a sharp fall into a central U-channel drain which drains into a sealed underground tank. There was formerly a connection to a surface water drain but this has been blocked. The contents of the tank will be inspected weekly or daily in the events of heavy rainfall. The tank will be alarmed so when it is near capacity, a notification will be sent to the site

management who will either pump out the contents or contact a suitable tankering company to do so. It is considered that as all waste arrives on pallets in shrink wrapping that there is a low risk of contaminants from any containers spilling on this area.

2.9.3 Clean water from roofs or from areas of the site which do not store and treat waste also discharge to the existing surface water sewer system. Any foul water connections i.e. from toilets or welfare will directly discharge into the existing foul sewer system.

2.9.4 Operational staff will undertake continuous checks of the drainage throughout the working day and in the event of surface water pooling, the operator will contact a reputable drainage contractor as soon as practicable to inspect and clear the drains as necessary.

2.10 Vehicles, plant and equipment

2.10.1 Waste will be handled using mobile plant listed in the table below. Additional plant will be hired to cover any very busy periods. Only trained operators will be permitted to drive/operate the plant listed below. Any changes to the list will be notified to the NRW prior to implementation.

Table 2.1 - Plant & Equipment

Item	Number	Function
Fork lift	5	Loading/unloading/movement/sorting

2.10.2 Fixed plant has not been included but is shown on Drawing No. ABB/2789/03 and further detailed in Section 3 of this EMS.

2.10.3 The plant/equipment on site will vary depending on the amount of waste accepted at the site.

3 Site operations

3.1 Preliminary procedures

3.1.1 Customers will return used plastic containers in accordance with the requirements of the Environmental Protection (Duty of Care) Regulations 1991 [as amended] and/or The Hazardous Waste (England and Wales) Regulations 2005 and Sector Guidance Note S5.06: recovery and disposal of hazardous and non-hazardous waste. All loads must be pre-booked for collection to ensure that they comply with the requirements of the EP. Guidance will be given by the site management to all employees, sub-contractors, other waste carriers and customers regarding the waste types which are acceptable at the site. The site is being set up to receive used plastic containers both loose and baled form which have originally been sold from AST Plastic Containers UK LLP own factories worldwide and used in the UK.

3.1.2 Where waste is brought in under sub-contract or delivered by other hauliers then the carrier registration details will be taken for all new haulage operators bringing waste to the site and the details will be periodically (every 12 months) checked with NRW to ensure that they are still registered. The procedures below are followed prior to the receipt of waste on site.

3.1.3 All drivers employed by or on behalf of AST Plastic Containers UK LLP will be trained to comply with the relevant health and safety regulations with respect to carriage of dangerous goods and receive additional training from AST Plastic Containers UK LLP regarding compliance and waste acceptance procedures.

3.1.4 When a driver arrives at the customers site to pick up a consignment of waste, he/she will inspect the load for conformity with relevant transport regulations, and safety procedures. This will also consist of a visual inspection to check that the waste has been used to store the product stated on the material safety data sheet supplied to AST Plastic Containers UK LLP. The condition of the waste must be acceptable i.e. no visible damage which could cause a leak.

i) If the load of waste s is satisfactory the driver will sign the relevant paperwork and remove the load from the customer's premises. The details of the load will have

already been notified to AST Plastic Containers UK LLP as part of their collection system.

ii) If the waste does not meet the description stated on the ticket or waste transfer note (WTN) or hazardous waste consignment note (HWCN) the customer will be advised that the load or part of the load cannot be collected. In the case of any hazardous waste any amendment may need approval from NRW before the load can be moved i.e. a reduction in the number containers stated on the HWCN.

iii) Once the decision has been made not to collect non-conforming IBCs the customer will have to arrange for a separate collection for disposal or recovery at their own cost.

iv) The driver may also report back to the site manager/COTC holder for instructions, especially where it is suspected that the details given on the transfer note are incorrect.

3.1.5 Whilst it is the duty of the waste producers to correctly identify and describe their waste, AST Plastic Containers UK LLP site management, site chemist and COTC holders will assist them wherever necessary to reduce the risk of rejection of the waste will assist them wherever necessary to reduce the risk of rejection of the waste. Whilst it is the duty of the waste producers to correctly identify and describe their waste AST Plastic Containers UK LLP site chemist and COTC holders will assist them wherever necessary to reduce the risk of rejection of waste.

3.1.6 As the plastic will be recycled into a non-waste product site management i.e. the TCM, site manager or operations manager will have significant responsibilities in respect of incoming material as their role is to select material of the best quality.

3.1.7 Materials are subject to pre-collection inspection by site management. Only our experienced buyers/sellers are authorized to approve quality and any uncertainties are discussed with the senior management team.

3.1.8 Site management will ensure that a purchase order is raised detailing the grades and quantities of material that is being acquired.

3.1.9 If the material is rejected under quality or contamination grounds this will be reported via email detailing the full facts to the senior management team. Photographic evidence will be taken in all instances of material rejection.

3.1.10 Site management will conduct periodic material audits on their suppliers to ensure quality standards are adhered too and on materials arriving at the site to ensure quality standards are adhered too.

3.2 Checking in & inspection of loads (general)

3.2.1 Drivers of all vehicles bringing waste into the site are required to park in the area shown on Drawing No. ABB/2789/03 to await checking and unloading and to report to the person responsible for checking and supervising acceptance of the load.

i) The tickets, WTNs and HWCNs relevant to the load are checked before the load is removed to ensure compliance with the booking procedure.

ii) The details of the load will be recorded and the accompanying paperwork will be further checked by the supervisor/operator to ensure that the load is acceptable at the recycling centre. Any deviation from the reception procedures or other problems with any loads will be reported to the site manager.

iii) Once a load has been accepted by the supervisor/operator the driver will be asked to un-sheet the vehicle (if it is sheeted) and a visual inspection of the contents of each container will be carried out to ensure that the waste types comply with the EP.

iv) During the commissioning phase of site operations this will also involve the input of a qualified industrial chemist (with waste treatment experience) who will inspect incoming loads and ensure that they are as stated on the WTN OR HWCN, that the material safety data sheet has been supplied with the containers (or previously if it is a repeated delivery) and that the containers are stored in batches

in the building. Storage in batches permits batch processing and is the safest and most efficient way to process the containers.

3.2.2 The nature of the waste makes full inspection difficult until the containers are unloaded. If non-conforming waste is discovered before the delivery vehicle has left the premises (i.e. in the unloading area) the containers will be rejected and reloaded for return to the producer or will be stored as a rejected containers (quarantined) prior to being taken off site for disposal or recovery to another permitted site.

3.3 Waste acceptance (plastic containers)

3.3.1 If the load is acceptable the containers will be unloaded using a forklift truck and deposited in AREA 1 inside the building. Containers will be segregated as they are unloaded to ensure that potentially incompatible wastes are stored separately and that the containers are stored together to batch them for rebuilding.

3.3.2 As delivery vehicles are unloaded the containers will be checked to ensure that they are residue free as required or where they contain some residues that the documentation correctly identifies those residues.

3.3.3 A maximum of 100,000 containers could be stored inside the building prior to processing, however, it is extremely unlikely that this number will be stored. It is the operator's intention to keep the space in the storage building as free as possible. The containers will be stacked to a maximum height of 3m, as stated previously.

3.3.4 The containers will be stored in the building by waste stream wherever possible to ensure that they can be batch processed for safety and efficiency reasons. To ensure the site does not mix and containers suitable for processing with those which cannot be, the chemist and/or site management will train staff to ensure wastes containing residues displaying the following hazard properties or hazard statements will not be treated at the site.

- Water reactive including H261, EUH014, EUH029
- HP2 oxidising including H270, H271 and H272]

- HP10 toxic for reproduction
- Heating may cause a fire H242
- Fatal if swallowed H300
- May be fatal if swallowed enters airways: H304
- Fatal in contact with skin H310
- Toxic if inhaled: H331
- Very Toxic to aquatic life: H400
- Very Toxic to aquatic life with long lasting effects: H410
- Flammable solid: H228
- Toxic by eye contact: EUH070
- Respiratory sensitising: H334

3.3.5 The above in summary comprise the following:

i) General non-hazardous chemicals
ii) Adhesives, glues and resins
iii) Food products/ingredients
iv) Paints, dyes, inks and pigments
v) Petrochemicals
vi) Biocides
vii) Isocyanates
viii) Hazardous chemicals (further separated according to risk)

3.3.6 Such segregation will be organised by the site chemist, who will give guidance to other site staff on the safe storage of containers. In summary, the batch segregation will be subject to veto by the site chemist if he/she considers that the wastes are potentially reactive.

3.3.7 A material safety data sheets (MSDS) will be retained for all containers to ensure that sufficient information is available to correctly handle the materials contained within the containers.

3.3.8 The site chemist will also take samples (in a clear glass container) from any loads at random to ensure that the materials in the IBCs match the description on the ticket. Simple field tests will be used i.e.

i) Visual appearance - colour, suspended solids, viscosity
ii) pH (portable meter)
iii) conductivity (portable meter)
iv) Temperature (portable meter)
v) Odour (where permissible - for safety reasons)

3.3.9 Other parameters may be agreed with NRW and samples may be subjected to a more detailed analysis if there is reasonable suspicion that the contents of the containers do not match the description on the WTN or HWCN. It is important to note that if the containers are not drip dry then sampling will only take place to facilitate removal off site, even if the product contained within the container does not present a hazard to the site's operations. This course of action is required to ensure a high standard of operation.

3.3.10 Once IBCs have been accepted and stored, they will be treated in accordance with the section below.

3.4 Waste acceptance (baled [plastics)

3.4.1 The majority of any baled loads will be delivered to the site in curtain sided vehicles. Once the vehicle curtains have been opened yard staff assess the material. If there is a problem with the material a supervisor or manager in charge will be called immediately and unloading will cease until further instructions are received. If the material shows signs of rodent, odours or other pest activity then the vehicle curtains will be closed immediately and a member of the management team will be informed.

3.4.2 If the material is acceptable, staff will take a picture of the vehicle registration number followed by at least four pictures of the material. If the material is unsuitable additional photographs will be taken clearly showing the contamination and the matter will be raised with the senior management team.

3.4.3 The operator's forklift truck drivers will unload the materials carefully to avoid damage to the fork truck or trailer and taking care not to leave bales left out of place or in mixed rows, which wastes time and causes double handling. The material will be unloaded directly into **AREA** 1 inside the building to avoid double handling. Bales will be stacked carefully to avoid them falling and will not be stacked too close to a wall. Bales will not be dragged across the floor.

3.4.4 Yard staff will ensure reduction of litter and debris by adhering to handling procedures and will clear any fallen materials immediately to avoid mixing and will salvage all good materials where possible. Drivers will not be permitted to sweep material onto the floor. When a trailer is empty the driver will be given the drivers a cage or bag to sweep into.

3.4.5 The waste reception bay **(AREA 1**) is shown on Drawing No. ABB/2789/03. If part or the whole load is unacceptable after deposit it will be loaded back onto the delivery vehicle, or stored until it can be taken to an approved facility to be disposed of. Otherwise, NRW will be contacted and the load will be taken to a suitably permitted or exempt site.

3.4.6 Once a load has been deposited into **AREA 1**, it will be subject to the processing procedures in this EMS shown in Section 3.6.

3.4.7 Non-conforming wastes rejected at any stage in the process will be deposited in the skip provided for non-conforming wastes. Where necessary, particularly where the rejected waste discovered would be classed as a difficult, hazardous or clinical waste, NRW will then be contacted to agree a course of action. The contents of the rejected waste skips will be recorded in the site diary.

3.4.8 Incoming loads will be taken to appropriate site areas based on their content and in accordance with the procedures stated below.

3.5 Weighing and categorising loads

3.5.1 The weight of each load into and out of the site will be weighed using the site's weighbridge to obtain accurate data for the purposes of providing waste returns and tracking the annual throughput of waste.

3.5.2 Should the weighbridge be off-line for any reason (fault/maintenance/failure/etc.), the weights of loads will be estimated using the standard NRW and WRAP agreed volume-to-weight conversion factors.

3.6 Waste treatment

3.6.1 The layout of the waste treatment process is shown on Drawing No. ABB/2789/03. A summary of the process is presented below:

- **Waste Reception –** Once accepted, waste will be brought onto site and directed to the tipping area **(AREA 1**) which is the waste acceptance and inspection area. This area will contain plastic containers on pallets within shrink wrapping, loose plastic containers and baled materual. Prior to treatment, the waste will undergo a further check by the site chemist and/or site management to demonstrate:

    i) Whether the waste is non-hazardous or hazardous
    ii) Whether the waste is suitable for treatment

- In terms of drums/containers, these will be segregated into hazardous (**AREA 3**) and non-hazardous container (**AREA 2**) so the operator can adhere to maximum treatment/storage capacities. It is unlikely the baled plastic material will be hazardous as it is unlikely to comprise drum form and would comprise packaging only.
- **Drum cleaning & washing plant –** The drum/container would firstly be cleaned using a hot wash in a full closed look system.
- **H20 water filtration system** – Any residues from the container will enter into the water filtration system which cleans the water at a very high temperature, the 'dirty'

contaminated water will be stored in a tank which is alarmed when capacity reaches >80% to ensure it can be emptied and removed to a suitably permitted site. The system recirculates water back to the washing cycle after treatment and produces a froth type liquid which will be disposed of into containers. The full containers will be disposed of to a suitably permitted site. No final effluent will be disposed of to foul sewer. Fresh water is only added to the process to replace that which leaves the process within the filter cake and sludges.

- **Shredder/wash plant –** Once drums / containers have been washed, cleaned and suitable for re-use, they will be stored to the south of the building i.e. the manufacturing / production area as they will not be waste. Damaged containers would then be fed into the conveyor of the shredder which leads directly into a further wash plant (closed loop system). Baled plastic can be fed directly into the shredding system once they have passed waste acceptance checks.
- **Pelleting plant –** Once the waste has been subject shredding and washing, it will be subject to the pelletising process. The pelleting plant will despatch the plastic pellets into tonne bags which will either be used to claim PRNs or be re-used to manufacturer new containers either on or off site.
- Any residues, dust/fluff or untreatable plastic containers will be stored in **AREA 4** prior to being removed off site.

3.6.2 Approximately every 6 weeks both wash plant and water filtration system will be completely cleaned and emptied then new water will pumped back into the system.

3.7 Waste removal & export

3.7.1 Rejected wastes will be quarantined as discussed in Section 2.8. Waste will be assessed by the site chemist to agree a course of action i.e. whether they should be consigned for disposal or recovery and whether the hazardous waste regulations apply. NRW will then be contacted to agree a course of action where necessary. The details of all rejected waste will be recorded in the site diary or in a clearly marked file in the site office so that the location and number of rejected containers are always known.

3.7.2 When a collection vehicle arrives at the site the driver will be instructed to report to the site supervisor. All relevant documentation will be completed and the vehicle will be passed to pick up the load and take it to the designated recycler/disposal site.

3.8 Sampling and analysis

3.8.1 Incoming wastes may be randomly sampled and submitted for analysis at the discretion of the site manager or chemist to verify the composition of a load. I

3.8.2 Analysis of samples (water/effluent/waste) will be carried out by an accredited laboratory.

3.9 Record keeping

3.9.1 The details below shall be recorded on all waste transfer notes, internal invoices, alternative documentation for all incoming and outgoing loads in line with the Waste Duty of Care: Code of Practice:

- a written description of the which has been agreed and signed by the operator and the next holder. The description is part of the waste information the operator will provide.
- a statement confirming that you have fulfilled your duty to apply the waste hierarchy as required by regulation 12 of the Waste (England and Wales) Regulations 2011 (see Waste Hierarchy Guidance for England and Wales)
- the description of the waste is accurate and contains all the information you are reasonably in a position to provide to ensure the lawful and safe handling, transport, treatment, recovery or disposal by subsequent holders, including classification of the waste by using the appropriate codes (referred to as the List of Wastes (LoW) or European Waste Catalogue (EWC)) - Appendix A of the Waste Classification Technical Guidance provides a list of the codes as well as advice on how to assess and classify waste.
- the quantity and nature and whether it is loose or in a container, if in a container, the type of container
- the time and place of transfer

- the SIC code of the transferor (current holder of the waste)
- the name and address of the transferor and transferee (person receiving the waste) and their signatures (the signature can be electronic as long as an enforcement officer can view it)
- the capacity in which the transferor and transferee are acting (e.g. as a producer, importer or registered waste carrier, broker or dealer) and their relevant authorisation to act in that capacity (e.g. their permit number or registration number)

3.9.2 A waste information note will not be required for non-hazardous waste if the waste holder does not change on the transfer of waste e.g. the waste is moved to other premises belonging to the same business. However, it is best practice that the business understands who has responsibility for that waste and a record is kept of internal transfers for audit purposes.

3.9.3 **Hazardous waste:** The site will be accepting any hazardous waste into the site. and will be done so using a fully completed hazardous waste consignment note. The records of which will be kept for 5 years.

3.9.4 A summary of waste types and quantities deposited at and removed from the site and origin and destination details are then forwarded to the EA using the standard Generic Operator Returns electronic spreadsheet(s), with submission due within one month of the end of each quarter as below:

a) Quarter 1: January to March (due on or before 30th April)
b) Quarter 2: April to June (due on or before 31st July)
c) Quarter 3: July - September (due on or before 31st October)
d) Quarter 4: October - December (due on or before 31st January of the following year)

3.9.5 Outcomes of inspections of waste types, hardstanding areas, transfer/treatment areas, storage areas, drainage channels, etc. are recorded using the site inspection form APC/RF/4 or similar document and detailed comments are entered into the site's diary (including action taken or proposed).

3.9.6 Visitors to the site are made to sign the visitor's book upon arrival and exit stating the purpose of their visit and whom they represent.

3.10 Site closure plan

3.10.1 In the event the site ceases to operate as a waste transfer/treatment facility as set out in the site's EP, the following steps will be followed to achieve site closure:

i) Contact the EA to advise the Environment Officer(s) that the site is planned to cease / have ceased the acceptance of wastes under the EP.
ii) The amount of residual processed and unprocessed waste on site will be assessed by the TCM to set a timetable for the final processing and timely removal of waste from site.
iii) Following removal of all waste, plant and machinery from site a site investigation will be undertaken to ascertain the ground conditions of the land to which the site relates.
iv) A surrender application will then be submitted to the EA for determination.

4 Environmental control, monitoring and reporting

4.1 Breakdowns and spillages

4.1.1 In the event of breakdown of the loading plant, alternative plant will be brought on site until it is repaired. If alternative plant cannot be sourced then waste will be stored securely until the plant is repaired. The repair will be carried out at the most convenient location with absorbents used to clear oil or fuel spillages.

4.1.2 As there is a risk of contamination on the concrete pad from unloading of waste, additional spill kits will be provided in this area in the event pallets are dropped or broke during unloading. Site staff will be trained to identify any spills in this area and use the procedures below to prevent anu contaminants entering adjacent surface water drains.

4.1.3 Any spillages of fuel/oil will be cleared immediately by depositing sand or absorbents on the affected area. The sand or absorbents will be placed in a skip/container to be taken to a suitably permitted site for disposal. All spillages of waste and windblown litter will be cleared by the end of the working day in which they occur. Spillage clearance procedures are detailed in Section 5.3.

4.1.4 All wastes liable to give rise to contamination will be removed from the site if the site is not secure or if operations cease or temporarily suspended.

4.2 Site diary / inspection form

A site diary for the purpose of recording site activities will be maintained in addition to record form APC/RF/4. The diary will also be used to record any other information relevant to the working of the site. The following information will be recorded in the diary/record forms required by the EP:

i) The identity of the signature of the inspection personnel;
ii) The date and time of the inspection (or event);
iii) The inspection details and any actions taken; and,
iv) The name of the nominated deputy in the absence of the site manager.

4.3 Security monitoring

4.3.1 As the site has security infrastructure in terms of gates/fencing, CCTV and alarms; no further monitoring i.e., security guard patrols will be carried out.

4.4 Control of mud and debris

4.4.1 Although unlikely to present a problem, due to the nature of the waste accepted and site surfacing of the site, visual inspections of the site will be carried out daily (see APC/RF/4). However, staff will report any problems with mud or debris at the site immediately to the site manager.

4.5 Control of dust

4.5.1 The containment and nature of waste within the site and all waste treatment plants being inside a building present a very low risk of dust.

4.5.2 If dust were to become a problem at the site, there is a permanent water supply available, and the operator may look to install additional suppression such as bowsers or dust cannons. Any external water pipes will be lagged to prevent frost damage during winter months.

4.6 Odour control

4.6.1 Risk assessment of the waste stream has revealed that the detection of noticeable odour outside the site buildings is unlikely for the following reasons:

i) The operator undertakes the same process in other countries which does not have the same level of containment and no odour is present.
ii) The containment of all waste within the building and the strict waste acceptance criteria presents a very low risk of odour nuisance.
iii) If malodorous waste is detected after deposit it will remain inside the container and marked as rejected and placed in quarantine for removal off site as soon as practicable.
iv) The containment of the recovery process within a purpose-built industrial building will reduce the likelihood of such a hazard occurring. Any incoming containers which are malodorous will be rejected. The operator will know from experience which containers are malodorous from their activities taking place in areas outside of the UK.
v) Containers which have contained product which is known to be odorous will be rejected.

4.6.2 There is, however, the potential for odour generation during the processing of containers i.e. drum cleaning, shredding, washing etc. For this reason, the washing of the plastics takes place after the container has been shredded in an enclosed process to reduce the risk of volatilisation.

4.6.3 Odour checks will be carried out daily and results recorded on the inspection form for the site (i.e. record form APC/RF/4 or the operators own recording form). Any wastes identified as giving rise to odour will be quarantined, where possible, and removed from site immediately, where practicable.

4.6.4 The site will have a complaints procedure similar to the information shown in APC/RF/7 and will be rigorously enforced should a third-party complaint be received from a public or private source.

4.7 Litter control & management

4.7.1 Although unlikely to present a problem, due to the nature of the waste accepted, containment measures and site surfacing of the site, visual inspections of the site will be carried out daily (see APC/RF/4). However, staff will report any problems with litter at the site immediately to the site manager.

4.7.2 When staff carry out inspections for litter on and off site they will collect the litter and place it in a skip for recovery before the end of the working day. Regular checks including four over a 24-hour period of the areas immediately beyond the site boundary will be carried out by site operatives. In the event of high winds, the frequency of checks may increase to reduce the risk of complaints.

4.8 Control of pests, birds and other scavengers

4.8.1 As the site will be accepting plastic waste there is potential for the risk of pests. The site will reduce this by thorough daily inspections for the presence of pests and the results of the inspection noted in the site diary or site inspection form.

4.8.2 If any occurrences of pests are noted, a pest controller will be called to site to eradicate the problem within a suitable timescale agreed with NRW.

4.9 Control and monitoring of noise & vibration

4.9.1 The location of the site in that it is >500m from any sensitive receptors with large industrial properties in between means noise associated with the proposed operations will not greatly increase the existing noise level in the surrounding area. The waste operations are carried out inside an industrial and will be carried out always using the Best Practicable Means.

4.9.2 A site-specific Noise Management Plan has prepared as part of this EMS and is shown on the table overleaf. These measures will ensure the noise levels at the site are managed appropriately by identifying:

- The likely sources of noise arising from the development and,
- The actions to be taken / procedures to be followed / planned to prevent or minimise levels.

Table 4.1 - Noise Management Table

Potential Noise Source	Action to be taken to prevent or minimise noise
HGVs travelling to and from the site for delivery/collection of wastes/products.	- All vehicles are required to be driven onto and off site with due consideration for neighbouring premises. - HGV movements will be spread out evenly throughout the day.
Loading/unloading of waste delivery vehicles	- Vehicles must be well maintained and operated with silencers. Moving parts to be regularly lubricated. All vehicles must be driven slowly around the site (5mph site speed limit). - Engines to be switched off when not in use. - Reversing alarms to be preferentially fitted with white noise alarms to minimise impacts on neighbouring sites. - No shaking of vehicle bodies whilst raised.
Operation of loading plant	- Drop heights to be kept to a minimum, particularly when loading empty tipper wagon/skip/container to minimise noise/vibration. - Engines to be switched off when not in use. - Plant to be well maintained and operated with silencers. Moving parts to be regularly lubricated. All vehicles must be driven slowly around site. - Loading plant/machinery will only be operated at ground level, i.e. never on stockpiles.
Operation of treatment plant (i.e. shredder, wash plant etc.)	- Drop heights to be kept to a minimum, particularly when loading into plant to minimise noise/vibration. - Plant/Engines to be switched off when not in use. - Plant to be well maintained and operated with silencers. Moving parts to be regularly lubricated. All vehicles must be driven slowly around site. - Only operated during operational hours.

4.10 Complaint's procedure

4.10.1 All complaints are recorded using a form like APC/RF/7. The form as a minimum will include a record of the complaint, particulars of the complainant and details of any action taken to alleviate the problem.

5 Emergency procedures and contingencies

5.1 General

5.1.1 In addition to obligations imposed by RIDDOR '13 (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013) the permit holder will notify the NRW of any serious injuries to employees of AST Plastic Containers UK LLP, other site users or members of the public arising as a result of operations on site. Minor injuries such as cuts and grazes etc. will be recorded in the accident book on site. Separate procedures will be used for different types of emergencies. An emergency at the site is defined by the site management as follows:

"Any incident which is likely to result in harm to human health or pollution of the environment or serious breach of permit conditions and serious detriment to the amenities of the locality."

5.1.2 For all emergency situations, the deposit of any further waste will be suspended where necessary to allow action to be taken safely. If necessary, staff and other users of the site will be evacuated to an area which is a safe distance away from the hazards. Staff handling the emergency will be provided with and trained to use the necessary PPE (personal protective equipment) unless the manager instructs them that the hazard is too severe and outside help is needed from the emergency services or specialist waste contractors. A visitor's book will be kept to check who is on site at all times.

5.2 Fire

5.2.1 The site will have an NRW approved FPMP (Document Ref. ABB-2789-B) which all staff are required to be familiar with and know of its location i.e. in the site office.

5.2.2 For quick reference, the following actions will be taken when fire is detected or suspected (Site operatives):

a) DON'T PANIC
b) RAISE THE ALARM (IF NOT DONE SO ALREADY)
c) NOTIFY THE SITE MANAGER (IF SAFE TO DO SO)
d) **DO NOT TRY TO TACKLE THE FIRE YOURSELF UNLESS YOU ARE TRAINED IN DOING SO AND YOU ARE SURE OF THE NATURE OF THE FIRE**
e) LEAVE THE USING THE MAIN ACCESS GATES AS QUICKLY AND AS ORDERLY AS POSSIBLE
f) ASSEMBLE AT THE SPECIFIED FIRE ASSEMBLY POINT WHICH IS LOCATED BY THE SITE ACCESS GATES.
g) THE SITE MANAGER OR DELEGATED OPERATIVE WILL BE IN CHARGE OF CALLING THE EMERGENCY SERVICES ON A999" AND ENSURING THAT ALL PERSONS WHO WERE WORKING ON THE SITE OR WHO SIGNED IN TO THE VISITOR'S BOOK ARE ASSEMBLED SAFELY
h) INFORM ALL NEIGHBOURING PREMISES WHO ARE LIKELY TO BE AFFECTED
i) INFORM THE NATURAL RESOURCES WALES
j) DO NOT RETURN TO THE SITE UNTIL YOU HAVE BEEN GIVEN THE ALL CLEAR BY THE EMERGENCY SERVICES AND THE SITE MANAGER

5.3 Spillages

5.3.1 All fuel stored on site is bunded to contain any fuel leaks. If oil and vehicle maintenance chemicals are kept on site these will be stored securely. If any spills occur a spill containment kit (absorbent pads, booms or granules) will be used to prevent further spillage and the contaminated absorbents placed in a skip for disposal to a suitably permitted landfill. No chemical leaks are expected in the waste handling area but should they occur

the procedures outlined in Section 5.4 will apply. Any wastes which would be classified as having the potential to cause polluting runoff are stored within the concrete area which is a sealed drainage system.

5.4 Adverse reactions

5.4.1 No wastes are accepted which will react to present such a hazard. If unauthorised waste is found in a load and does present such a hazard the same procedures as for the deposit of drums (above) shall apply.

5.5 Staff shortages

5.5.1 In the event of unforeseen staff shortages arising from illness, suspension or no shows, the operator will make a judgement whether to reduce the number of incoming loads and divert material to an alternative site. The operator will then seek further employment within a timely manner to ensure the site can continue to operate at its required capacity.

5.6 Adverse weather conditions

5.6.1 **High winds** - The transfer building provides sufficient containment to prevent light wastes from blowing off site in high winds. Vehicles leaving the site will be sheeted to comply with the requirements of the Duty of Care legislation.

5.6.2 **Poor visibility** - Site operations will not be affected by conditions of poor visibility because all waste handling operations are carried out within the building. Vehicle movements may be reduced in conditions of such as dense fog to reduce the risk of vehicle collision or other accidents.

5.6.3 **Droughts / warm weather** – All waste will be stored inside the building.

5.6.4 **Long periods of rainfall or flood events** – Site operations will not be affected by conditions of wet weather because all waste handling operations are carried out within the building. The external drainage system would be checked to ensure any sewers do not overflow.

5.6.5 **Closure of destination sites** – As the site will be turning waste into a product, there is a very small risk of waste building up at the site.

5.7 Operational failure

5.7.1 The manager will be contacted by staff in the event of any operational failure such as the breakdown of plant, systems or equipment and will decide whether operations are to continue or be suspended prior to corrective action being taken. Serious operational failures, which result in the closure of the site, will be recorded in the site diary.

5.8 Bomb scare

5.8.1 In the unlikely event of a bomb scare, the site will be evacuated and the police contacted. The police will then assume control of the site until the threat has been verified or the device defused and removed. NRW will be kept informed of the events on site.

6 Training for site staff

6.1 Training needs assessment

6.1.1 All new and existing site staff are subject to a specific training regime based on their responsibilities at the site to ensure all operations are carried out without harm to the environment or amenity of the surrounding area. Training in all aspects of the site and waste operations at the site with regard to the individual responsibilities of the site staff will help to prevent incidents occurring which may have an adverse impact on the environment and/or the employees and their co-workers.

6.1.2 An employee training record will be available at the site detailing information similar to APC/RF/6 in Appendix II and shall provide a comprehensive checklist for the training needs of all new site staff and also serves as a training review for existing site staff which will be carried out annually or a period set at the operator's preference.

6.2 Site rules and infrastructure training

6.2.1 This information is provided to all employees, visitors and contractors with a full understanding of the site's conditions of use, which is communicated and documented at induction for all staff with specific induction for visitors and contractors.

6.2.2 Competency should be demonstrated within this field to ensure the employee is fully aware of the site's surroundings and operations to ensure their safety and compliance with specific operating conditions at the site.

6.3 Emergency procedures training

6.3.1 All employees are required to be familiar with the Environmental Controls in Section 4.0 and the Emergency Procedures as detailed in the Section 5.0.

6.3.2 In addition to normal operating conditions as specified in the site rules, employees must also be trained in dealing with eventualities which may occur outside the scope of normal operating conditions, so they are aware of how to deal with these situations in advance of an occurrence.

6.4 Fire safety / firefighting training

6.4.1 Management must provide all employees with appropriate fire safety training with regard to their individual responsibilities.

6.4.2 Emergency procedures detailing what measures employees should adopt should a fire occur at the site are detailed in Section 5.2 and are covered by the 'emergency procedures' training (see Section 6.3).

6.4.3 Regular fire drills are undertaken by site management to ensure proper procedures are followed by employees in the unlikely event that a fire incident occurs**.** These will be unannounced drills and will not form part of the induction or review training as specified in Section 6.1.

6.5 Recognition of waste types training

6.5.1 All employees are given induction training and subsequent regular training to identify those waste types which are permitted for acceptance at the site under the site's EP and those wastes which are not. This will include specific training to identify those common wastes which may be found following deposit and are not permitted at the site and will also include more obscure wastes and how to handle these wastes safely. All employees are advised that they should refer any unrecognisable or unknown wastes to senior management, who should, in turn, follow procedures outlined in the EMS and/or contact the NRW to agree a suitable method for removal.

6.5.2 Training is provided to all site users who handle waste on site and those in charge of administration and reporting. In-depth training will also be provided to drivers responsible

for collecting wastes from the site of production in accordance with Section 3.0. They will be trained to identify any wastes not covered by the EP for the site and inform the producer that an alternative facility must be sought for any non-compliant wastes.

6.6 Storage areas / limits training

6.6.1 Those employees who carry out their responsibilities at the site and those in senior posts must be trained to identify appropriate waste storage areas to ensure that waste storage operations comply with the requirements of the EP for the site.

6.6.2 Employees in these roles must also be trained to recognize storage limits to ensure that they are in accordance with those specified in Section 1.6

6.7 Vehicle / plant preventative maintenance training

6.7.1 This training is provided specifically for the vehicle and plant operators in order to ensure that all plant and machinery is checked regularly to prevent any occurrences which may lead to any adverse impacts on the environment or human health.

6.7.2 Training will be in accordance with Section 3.5 of this document and will be based on the preventative maintenance schedule supplied by the plant/equipment manufacturer.

6.7.3 The same training will be provided to senior management enabling a dual-level maintenance programme.

6.8 Duty of care training

6.8.1 All employees dealing with consignments of waste are trained in the completion of Duty of Care Waste Transfer Notes and the appropriate auditing of destination sites and/or contractors to ensure compliance.

6.9 Plant operation training

6.9.1 Any employees who are required to operate loading or treatment plant for the movement or processing of waste will be required to undertake the necessary qualifications for the operation of the specific item of plant in question. This will be required prior to operating the plant and will be obtained through necessary external certification programmes.

6.9.2 Regardless of general plant operation certification, all operatives will be fully inducted in the operation of the specific make and/or model of plant used on site.

6.10 Permit / management System

6.10.1 All employees will be inducted into the operating conditions as prescribed in the EP for the site. Whilst much of the above training will provide specific guidance on many aspects of these documents, all employees will be made aware of the location of the EP and EMS in the site office. All managerial positions will be made fully aware of the site's operating conditions.

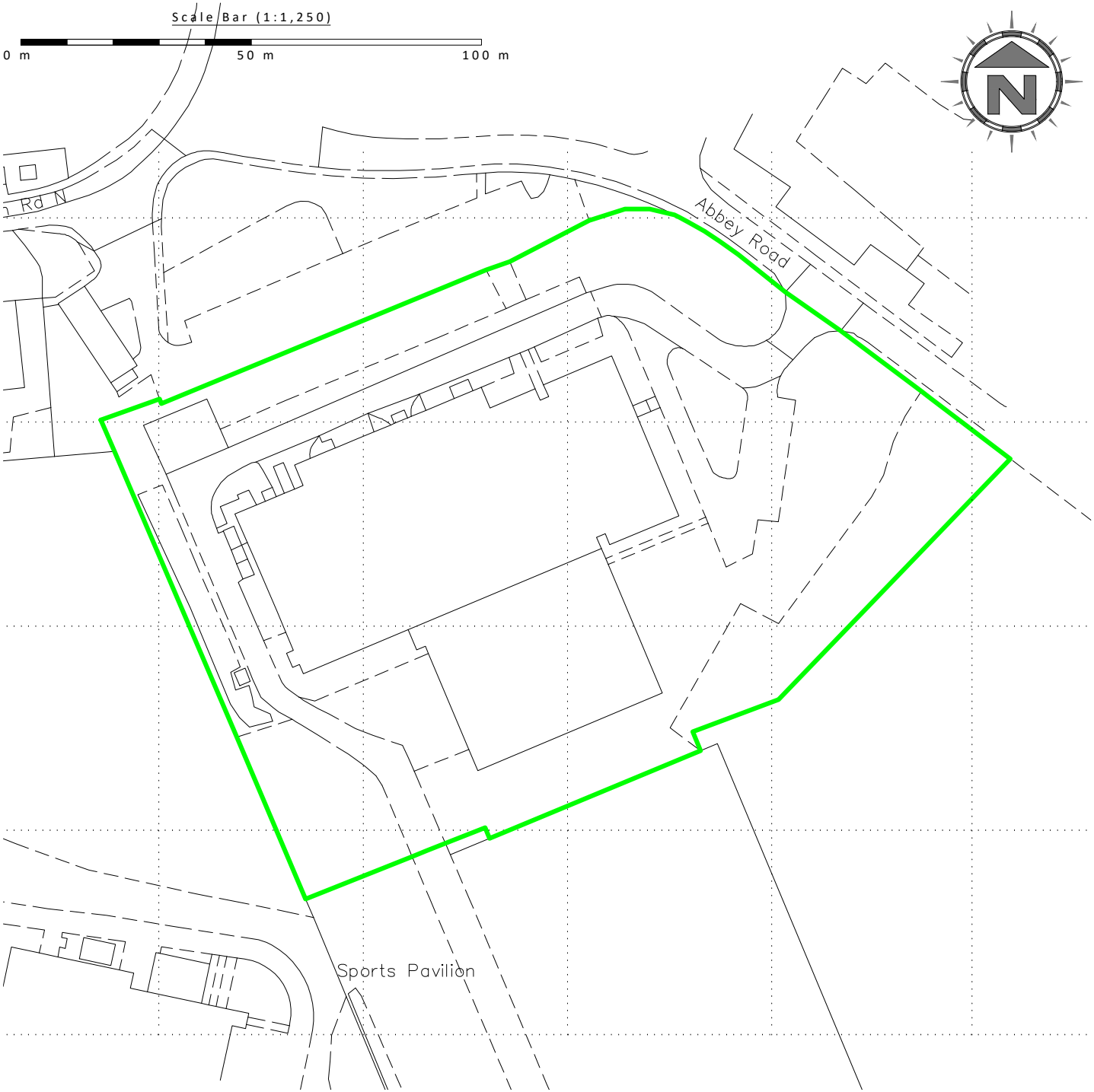
6.11 Training for contractors

6.11.1 General site training will be provided to any contractors who are working on the site on a temporary basis as described in Sections 6.2, 6.3 and 6.4 above.

6.11.2 Additional training will be provided to contractors in their area of expertise. If they are dealing with specific items of plant/equipment/machinery, site operating conditions and a general understanding of the EP conditions will be provided to prevent any adverse impacts on the environment.

Appendix I

Drawings



NOTES

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REVISION HISTORY

Rev:	Date:	Init:	Description:
-	17.06.21	CP	Initial drawing

KEY:

Permit boundary

Oaktree Environmental Ltd

Waste, Planning and Environmental Consultants

DRAWING TITLE

PERMIT BOUNDARY PLAN

CLIENT

AST Plastic Containers UK LLP

PROJECT/SITE

Unit 1, Abbey Road, Redwither Business Park, Wrexham LL13 9RF

SCALE @ A4	CLIENT NO	JOB NO
1:1,250	2789	002

DRAWING NUMBER	REV	STATUS
ABB/2789/02	-	Issued

DRAWN BY	CHECKED	DATE
CP	--	17.06.21

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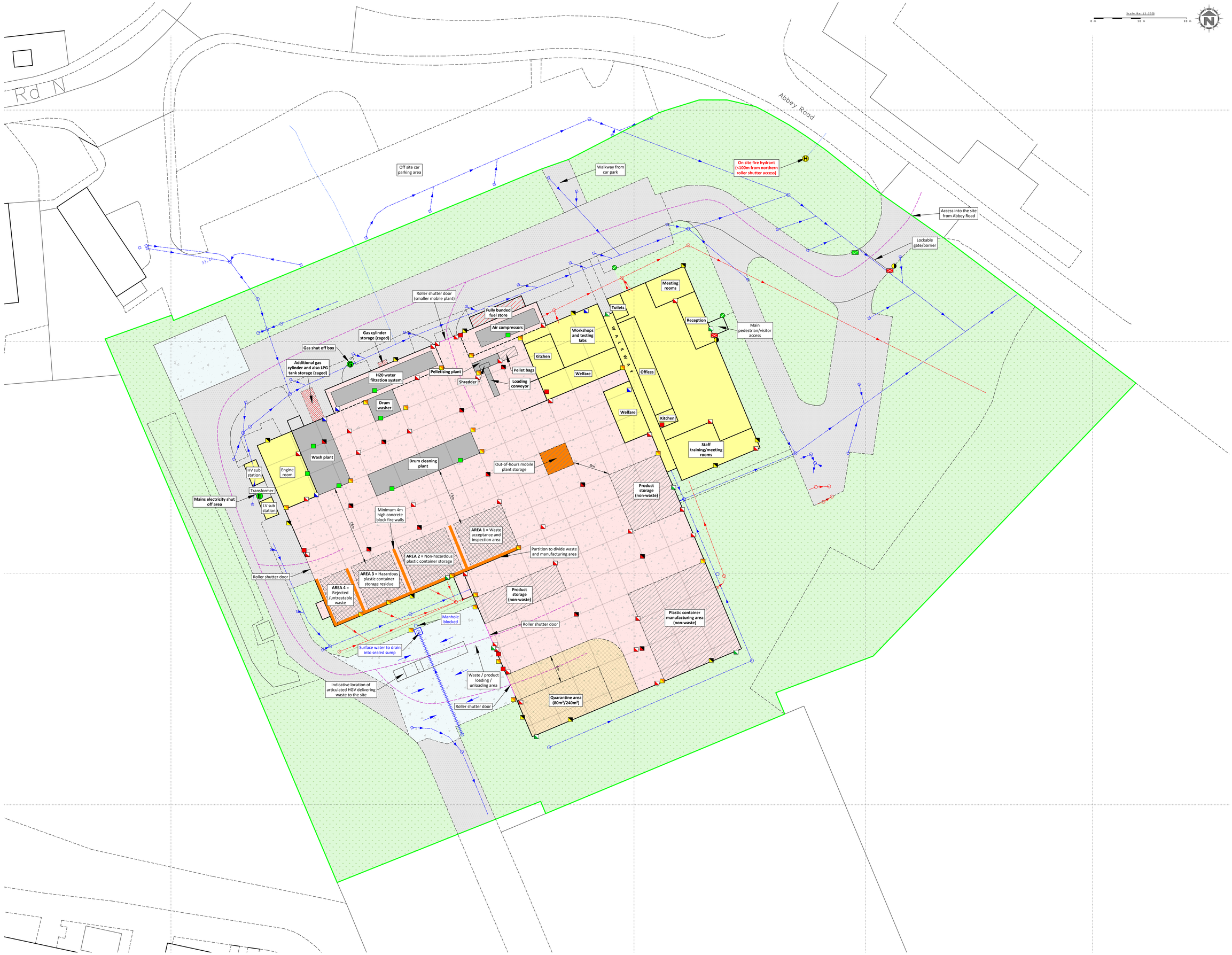

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Scale Bar 1:250

0 m 10 m 20 m

REVISION HISTORY

Rev:	Date:	Init:	Description:
-	14.07.21	CP	Initial drawing
A	24.01.22	CP	NRW comments
B	22.02.22	CP	NRW comments

Key:

- Permit boundary
- Combustible waste storage areas
- Product storage non-waste
- Waste recycling buildings
- Concreted areas
- Other buildings (offices, etc.)
- Stone surface / free draining
- Landscaped/grass areas
- Location of fixed plant (indicative)
- Minimum 0.6m wide, 4m high concrete firewalls
- 0.10m high ramp/seal
- Mains water point
- Spill kit
- Fire fighting equipment (extinguishers, etc.)
- Access routes for emergency vehicles and site plant manouevring areas
- Fire alarm
- Surface water fall direction
- Foul water drainage
- Surface water drainage
- Incoming water supply
- Foul/surface gully's
- Foul/surface manholes
- Plant shut off
- Fire assembly point
- Fire door
- CCTV cameras (indicative)
- CCTV alarms
- Infrared/heat detection cameras
- Emergency services box
- Fire hydrant
- Smoking areas
- Gas shut off box
- Electricity shut off

Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants

DRAWING TITLE
SITE LAYOUT & FIRE PLAN

CLIENT
AST Plastic Containers UK LLP

PROJECT/SITE
Unit 1, Abbey Road, Redwither Business Park, Wrexham LL13 9RF

SCALE @ A0	CLIENT NO	JOB NO
1:250	2789	002

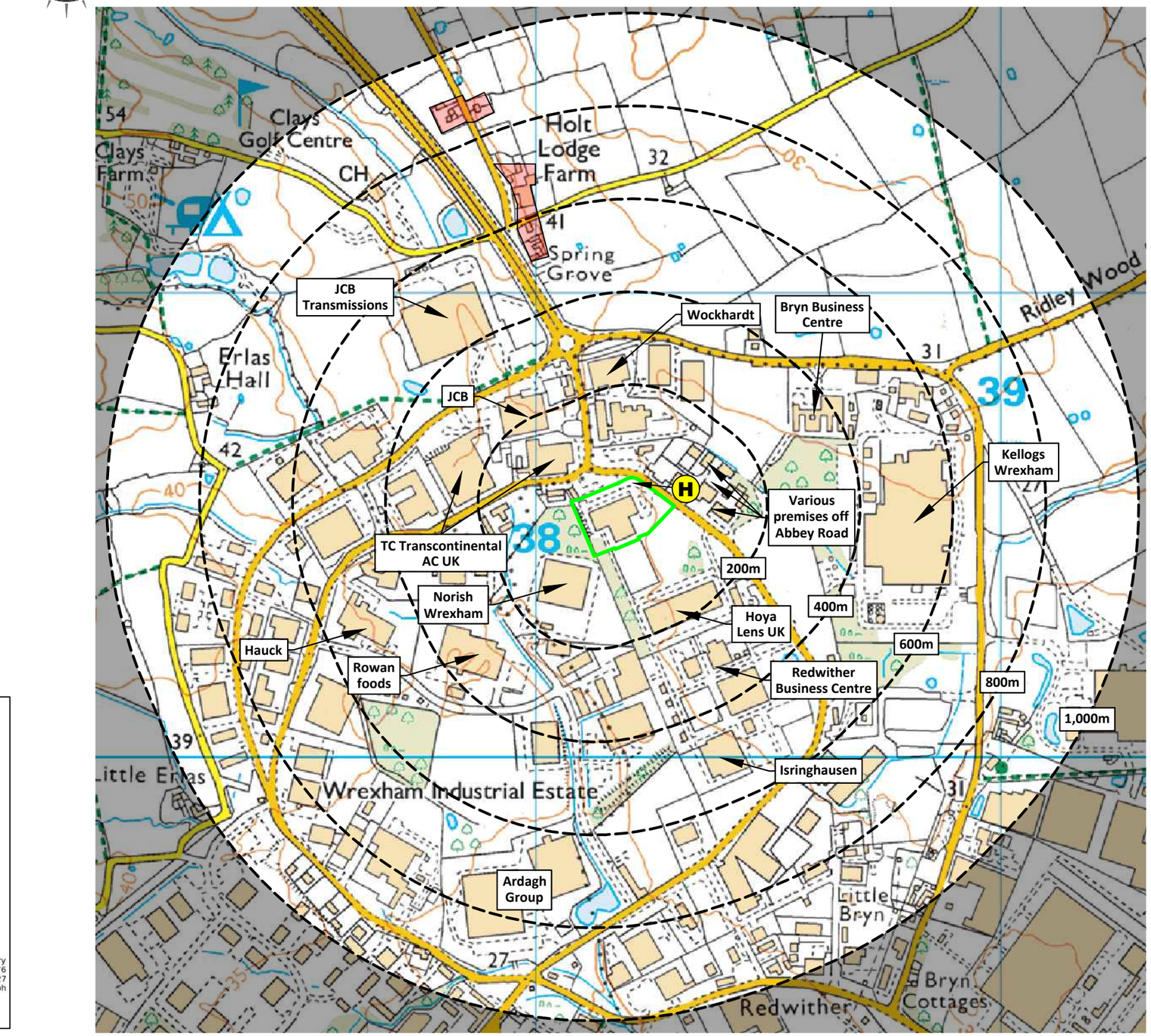
DRAWING NUMBER	REV	STATUS
ABB/2789/03	B	Issued

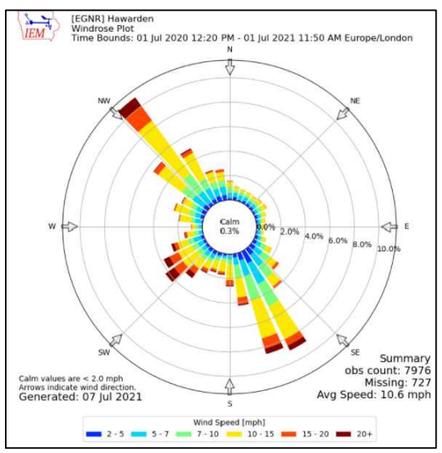
DRAWN BY	CHECKED	DATE
CP	--	22.02.22

Lime House, Road Two, Winsford, Cheshire, CW7 3QZ
t: 01606 558833 | e: sales@oaktree-environmental.co.uk

KEY:

- Permit boundary
- Surface water (river / stream / beck)
- Surface water (estuary / pond / pool / lake / sea)
- Workplaces (includes agriculture industry, commerce and retail)
- Residential blocks
- Class A roads
- Class B roads
- Class C roads
- Nearest fire hydrant
- Railway line
- Woodland areas





Compass Wind Rose for Hawarden (EGNR) Period 2020 - 2021 - *source: Iowa State University*

Scale Bar (1:10,000)

0 m 500 m 1000 m

NOTES

1. Boundaries are shown indicatively.
2. Wind rose data shows the prevailing wind direction to be blowing North-west.

REVISION HISTORY

Rev:	Date:	Init:	Description:
-	07.07.21	CP	Initial drawing

Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants

DRAWING TITLE
RECEPTOR PLAN

CLIENT
AST Plastic Containers UK LLP

PROJECT/SITE
Unit 1, Abbey Road, Redwither Business Park, Wrexham LL13 9RF

SCALE @ A3	CLIENT NO	JOB NO
1:10,000	2789	002

DRAWING NUMBER	REV	STATUS
ABB/2789/04	-	Issued

DRAWN BY	CHECKED	DATE
CP	--	07.07.21

Lime House, Road Two, Winsford, Cheshire, CW7 3QZ
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Appendix II

Record Keeping Forms

AST PLASTIC CONTAINERS UK LLP
REJECTED WASTE - RECORD FORM APC/RF/2

DATE	
TIME	
WASTE DESCRIPTION	
QUANTITY OF WASTE	
PRODUCER/HOLDER'S NAME, ADDRESS & TELEPHONE No.	
NAME OF CARRIER	
VEHICLE REGISTRATION	
CARRIER REG. No.	
REASON FOR REJECTION OF WASTE	
ACTION TAKEN	

	AST PLASTIC CONTAINERS UK LLP **SITE INSPECTION FORM – APC/RF/4**

WEEK STARTING									
TYPE OF INSPECTION		**FREQ**	**DAY**						
			M	**T**	**W**	**T**	**F**	**S**	**S**
SITE ENTRANCE/NOTICE BOARD		**WEEKLY**							
SECURITY - GATES		**WEEKLY**							
SECURITY - FENCING		**WEEKLY**							
SITE ROADS (CLEAR FROM HAZARDS)		**DAILY**							
IMPERMEABLE CONCRETE AREAS		**DAILY**							
BUND AROUND CONCRETE PAD (INTEGRITY)		**DAILY**							
DRAIN (FUNCTIONING)		**DAILY**							
HOLDING TANK / SUMP / INTERCEPTOR		**WEEKLY**							
WASTE CONTAINERS		**DAILY**							
WASTE STORAGE LIMITS	PLASTICS	**WEEKLY**							
WASTE STORAGE LIMITS	TYRES	**WEEKLY**							
WASTE STORAGE LIMITS	OTHER	**WEEKLY**							
REJECTED WASTE TYPES / STORAGE		**WEEKLY**							
NOISE LEVELS		**DAILY**							
FIRES (ANY INCIDENTS REPORTED)		**DAILY**							
NO SMOKING SIGNS IN PLACE		**MONTHLY**							
SPILLAGES & ABSORBENTS		**DAILY**							
FUEL TANK/BUND INTEGRITY		**WEEKLY**							
LITTER		**DAILY**							
DUST		**DAILY**							
ODOUR		**DAILY**							
VERMIN		**DAILY**							
RECORDS		**WEEKLY**							
COMPLAINTS RECEIVED		**AS REQUIRED**							
OTHER (SEE NOTES BELOW)		**AS REQUIRED**							
INSPECTION CARRIED OUT BY									

	NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):

CHECKED BY			**SIGNATURE**	
POSITION			**DATE**	
Sheet			***of***	

AST PLASTIC CONTAINERS UK LLP - EMPLOYEE TRAINING NEEDS ASSESSMENT / REVIEW

EMPLOYEE NAME		**DATE COMPLETED**	
POSITION		**REVIEW DUE**	
TRAINER		**OUTCOME**	**PASSED**
POSITION			**FURTHER TRAINING REQUIRED**

CARRIED OUT /SIGN OFF >	**Y/N**	**SIGNED BY EMPLOYEE**	**SIGNED BY TRAINER**		**Y/N**	**SIGNED BY EMPLOYEE**	**SIGNED BY TRAINER**
ENVIRONMENTAL PERMIT				**FIRE PREVENTION & MITIGATION PLAN**			
MANAGEMENT SYSTEM				**FIRE SAFETY**			
SITE RULES				**EMERGENCY PROCEDURES**			
RECORD KEEPING / TRANSFER NOTES				**STORAGE /PILE SIZE LIMITS**			
RECOGNITION OF WASTE TYPES				**STORAGE DURATION**			
SECURITY				**FIRE DETECTION**			
VEHICLE CHECKS				**FIRE ALARMS**			
PLANT OPERATION				**FIRE FIGHTING EQUIPMENT**			
PLANT CHECKS				**FIRE WATER CONTAINMENT MEASURES**			
AMENITY - LITTER, ODOUR, PESTS etc.				**SPILL CLEARANCE**			

NOTES AND ACTIONS:

AST PLASTIC CONTAINERS UK LLP
COMPLAINTS REPORT FORM (APC/RF/6)

Date Recorded:	**Reference Number:**
Name and address of caller	
Telephone number of caller	
Time and Date of call	
Nature of complaint (noise, odour, dust, other) (date, time, duration)	
Weather at the time of complaint (rain, snow, fog, etc.)	
Wind (strength, direction)	
Any other complaints relating to this report	
Any other relevant information	
Potential reasons for complaint	
The operations being carried out on site at the time of the complaint	
Follow Up	
Actions taken	
Date of call back to complainant	
Summary of call back conversation	
Recommendations	
Change in procedures	
Changes to Environmental Management System (EMS)	
Date changes implemented	
Form completed by	
Signed	
Date completed	

COMPLAINT RECORDING PROCEDURE:

Any complaints received will be recorded on form APC/RF/7. This form will normally be completed, signed and dated by the Site Manager; if they are not available the Office Manager will complete the form.

1) The name, address and telephone number of the caller will be requested.

2) Each complaint will be given a reference number.

3) The caller will be asked to give details of:

    a) the nature of the complaint;
    b) the time;
    c) how long it lasted;
    d) how often it occurs;
    e) Is this the first time the problem has been noticed; and
    f) what prompted them to complain.

4) The person completing the form will then, if possible, make a note of:

    a) the weather conditions at the time of the problem (rain, snow, fog etc.);
    b) strength and direction of the wind; and
    c) the activity or activities taken place on the site at the time the noise was detected, particularly anything unusual.

5) The reason for the complaint will be investigated and a note of the findings added to the report.

6) The caller will then be contacted with an explanation of the source of the complaint if identified and the action taken to prevent a recurrence of the problem in future.

7) If the caller is unhappy about the outcome or unwilling to identify themselves the caller will be invited to contact the NRW and or the Local Authority.

Note: Following any complaint the relevant management plan(s) will be reviewed to ensure appropriate actions are in place to counter any problems.

Appendix III

Copy of Issued Environmental Permit

Appendix IV

Health & Safety – Conditions of Site Use

HEALTH AND SAFETY - CONDITIONS OF SITE USE

The following guidelines apply to all site personnel, contractors and visitors using the site (where applicable).

1) The site is covered by the Health and Safety at Work Act 1974 and its associated regulations and all users must abide by any relevant provisions. Any person found to be in contravention of the requirements of this Health and Safety Statement will be asked to leave the site.

2) All visitors and contractors must sign the visitor's book upon entry to and exit from the site. All vehicle drivers must report to the office and await instruction from the site manager/deputy before proceeding to deposit waste at the site.

3) All accidents, diseases, injuries or dangerous occurrences shall be reported to the site manager. All instructions issued by the site manager in respect of health and safety at the site must be followed by all site users.

4) A first aid box (including eye-wash bottles) is kept in the site office. If you are injured on site please alert a member of staff/trained first-aider for assistance.

5) All persons must wear the appropriate PPE on site including high visibility jackets and hard hat.

6) Safety boots must be worn by all persons in the waste sorting/storage areas.

7) Protective gloves must be worn for any operations which present a hazard of puncture to or laceration of the skin or for any manual handling work carried out on site.

8) Ear defenders, safety helmets (hard hats) and eye protection will be issued when deemed necessary and must be worn by all employees and contractors where required by the site manager or other site representatives.

9) Fire extinguishers are kept on site to deal with any fires - fires shall only be dealt with by employees of AST Plastic Containers UK LLP unless alternative instructions are given by the site manager. Access to fire exits and firefighting equipment must be kept clear at all times. When the fire alarm sounds please follow instructions and leave the site in an orderly fashion.

10) Persons who are suspected to be under the influence of drugs or alcohol will be removed from the site.

11) Smoking is not permitted on the site.

12) Observe and follow all traffic directions and traffic/safety signs.

13) Drivers must comply with all safety instructions given by the site manager or appointed deputy.

14) All drivers are responsible for ensuring that their vehicle is safely loaded. Unsafe loads will not be accepted at the site and will not be allowed to leave the site until they have been made safe.

15) Drivers waiting to tip at the recycling centre shall follow the instructions of the operator and shall only tip in the designated area, unless advised otherwise. No tipping shall take place over sorted stockpiles.

16) Drivers must remain in the cab or stand well clear of the vehicle during loading or tipping. Once the vehicle has been loaded it must be securely sheeted (if necessary) before leaving the site. When sheeting and unsheeting the vehicle ensure that the engine is switched off, the ignition key removed and the parking brake is on. Do not gain access using the mudguards and wheels. Ensure that your ropes, hooks and sheets are in good condition.

17) Never travel with the vehicle body raised. Ensure you know the maximum height of the raised body of your vehicle.

Declaration: To be completed by site users

I have read and understand the conditions of use for this site and agree to comply with them at all times. I accept that neither AST Plastic Containers UK LLP nor their employees shall be liable for any loss or injury arising from my non-compliance with the above conditions.

Signed..... Print name.....

Company/Organisation..... Date.....

Note: these conditions are included in the EMS for information only and may be revised regularly as part of the site health and safety policy.